

Appendix K

Final

Environmental Impact Statement for

Implementation of

2005 Base Realignment and Closure (BRAC)

Recommendations and Related Army Actions at

Fort Belvoir, Virginia



prepared by

U.S. Army Corps of Engineers, Mobile District

with Technical Assistance from

Tetra Tech, Inc.
Fairfax, Virginia 22030

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Appendix K

Comments Received on the Draft EIS and Responses

K.1 – Comment Methodology and Summary

K.2 – Comments

K.3 – Comment Response Matrix

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Appendix K.1
Comment Methodology and Summary

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Comment Response Methodology

The Army received 88 sets of comments on the draft EIS. This included transcripts of oral testimony from 7 elected officials and 19 citizens at the DEIS public meeting and 62 written comments (via letters, electronic mail, and the belvoirbrac-eis.net website).

Comments were assigned to one of four categories based on the organization that submitted them as follows. The lettered designation is part of the comment number assigned to the comment:

- Federal agencies and elected officials (F) (6 comments)
- Local agencies and organizations (L) (18 comments)
- Public citizens and other citizen organizations (P) (58 comments)
- State agencies (S) (6 comments)

Within each category, each comment was assigned a number. The text of the comments were then divided into specific issues pertaining to the same resource area or the same topic within a single resource area. Each of the issues were labeled with a comment number. For example, comment F1 contains 4 issues numbered F1.1, F1.2, F1.3, and F1.4. There were 886 specific issues identified within the 88 comments submitted. The Army prepared responses to each issue. The comments were entered into an Access database, which contains such information as commenter name, organization, and address, resource area the comment pertains to, and the delivery format in which the comment was received.

The first half of this appendix contains all the sets of comments in the format they were originally received (letters, electronic mail, etc). The second half of this appendix contains a matrix of the comment blocks as well as the responses to those comments. The comment numbers on the original comments match the comment numbers in the matrix containing the responses. In both the original comments and the matrix, they are in alpha-numeric order by organization category (F, L, P, S).

The breakdown of the 886 issues by resource area is as follows. A listing of general themes of the comments within each resource area is also provided. The Army's responses for the themes are provided in the matrix in the second half of this appendix.

- **Transportation** (269 issues)
 - Commitment to fund transportation mitigation projects
 - Identification of responsible (lead) agencies and timelines for mitigating actions
 - Adoption of transportation mitigation projects and completing designs/studies
 - Trails and non-motorized transportation
 - Requests for further details examining long-term elements of the transportation network
 - Study needs to consider rail to Fort Belvoir
 - Transportation modeling and analyses assumptions
 - Army Museum traffic impacts
- **General (Proposed Action, DOPAA, Other, Land Use, Cumulative Impacts)** (263 issues)
 - Changes to land use plan, particularly removal of environmentally sensitive category
 - Consideration of GSA Parcel as part of the preferred alternative
 - Ability to meet Congressionally-mandated 2011 BRAC deadline

- Need for meetings with all stakeholders involved with BRAC action
- Impacts of support contractors that would follow DoD agencies coming to Fort Belvoir (“contractor tail”)
- **Air Quality** (69 issues)
 - General Conformity Determination and compliance with air quality regulations
 - Transportation congestion and impacts on air quality
 - Regional mobile emissions
- **Natural Resources (Geology and Soils, Water Resources, Biological Resources)** (118 issues)
 - Impacts on surface water runoff
 - Chesapeake Bay resource protection areas encroachment
 - Impacts on wildlife, threatened and endangered species, and wetlands
 - Protection of Environmental Quality Corridors
- **Cultural Resources and Aesthetics and Visual Resources** (84 issues)
 - Impacts on both on- and off-post historic resources
 - Compliance with Section 106 of the National Historic Preservation Act
- **Socioeconomics** (37 issues)
 - Impacts of projected changes in the number of school-age children on the school systems
 - Projected population and housing changes
 - Changes in availability of recreational facilities
- **Other (Noise, Utilities, Hazardous Materials and Hazardous Substances)** (46 issues)
 - Noise impacts from construction and operation activities
 - Compliance with energy efficiency regulations and guidelines
 - Corrective action activities to clean up sites proposed for BRAC development

Table K-1 provides a list and agencies and citizens of those who provided comments on the Draft EIS.

Table K-1
Commenters on the Draft EIS

Comment Number	Name and Title	Organization
F1	Jim Webb, Senator	U.S. Senate
F2	Jim Moran, Congressman	U.S. House of Representatives
F3	Tom Davis, Congressman	U.S. House of Representatives
F4	Roberto Fonsera Martinez, Division Administrator	Federal Highway Administration
F5	Michael Chezik, Regional Environmental Officer	U.S. Department of Interior
F6	William Arguto, NEPA Team Leader	EPA Region 3
L1	Gerald Connolly, Chairman (Written Comments)	Fairfax County Board of Supervisors
L2	Gerald Connolly, Chairman (Oral Testimony)	Fairfax County Board of Supervisors
L3	Gerry Hyland, Mount Vernon District Supervisor	Fairfax County Board of Supervisors
L4	Dana Kauffman, Lee District Supervisor	Fairfax County Board of Supervisors

**Table K-1
Commenters on the Draft EIS**

Comment Number	Name and Title	Organization
L5	Gerald Connolly, Chairman (Written Comments)	Fairfax County – Multiagency Letter
L6	Jack D. Dale, Superintendent	Fairfax County Public Schools
L7	John A. Magarelli, Senior Civil Engineer	WMATA
L8	John Pellegrin, member (Written Comments)	The South County Project Steering Committee
L9	John Pellegrin, member (Oral Testimony)	The South County Project Steering Committee
L10	Rich Baier, Director	Alexandria Transportation & Environmental Services
L11	Pat Thomas, Potomac Communities Planner	Prince William County Planning Office
L12	Gerald Lyons	Mason Neck Citizens Association
L13	Judy Riggan, Clerk, Community Developments Committee	Woodlawn Friends Meeting
L14	Glenda Booth, Vice President (Written Comments)	Audubon Society of Northern Virginia
L15	Glenda Booth, Vice President (Oral Testimony)	Audubon Society of Northern Virginia
L16	C. Flint Webb, P.E. (Oral Testimony)	Fairfax County Citizens Associations Environmental Committee
L17	Frank Cohn, Chair, Transportation Committee	Mount Vernon Council of Citizens Association
L18	Patricia Gallagher, Executive Director	National Capital Planning Commission (NCPC)
P1	Eileen Hurley	Private Citizen
P2	John Hurley	Private Citizen
P3	Gerald Lyons (Written Comments)	Mason Neck Citizens Association (MNCA)
P4	Gary Kitchen	Private Citizen
P5	Yolanda Nicholson	Private Citizen
P6	No Name Available	Private Citizen
P7	No Name Available	Private Citizen
P8	David Kerner	Private Citizen
P9	Colonel Michael Brownell	Private Citizen
P10	Dianne Kelly	Private Citizen
P11	Lee Schroeder, Marine Safety Data Analyst	Private Citizen
P12	Frank Cohn, Chairman, Transportation Committee	Mount Vernon council of Citizens
P13	Robert McLaren (Written Comments)	Private Citizen
P14	Dale Dendra	Private Citizen
P15	David and Jo-Anne Clark	Private Citizen
P16	Gerald Lyons, Community Representative (Written Comments)	Communities of Mason Neck
P17	Martha Catlin	Private Citizen
P18	Joseph Chudzik	Private Citizen
P19	John Sperling (Written Comments)	Private Citizen
P20	Nancy James	Religious Society of Friends (Quakers)

**Table K-1
Commenters on the Draft EIS**

Comment Number	Name and Title	Organization
P21	Phillip Latasa	Friends of Accotink Creek
P22	Tracey Paddock	Private Citizen
P23	Lee Schroeder	Private Citizen
P24	Gail Gillespie, MGSgt	USMC
P25	Roger Diedrich	Great Falls Group, Sierra Club
P26	C. Flint Webb, P.E. (Written Comments)	Private Citizen
P27	Sallie Lyons (Written Comments)	Private Citizen
P28	David Hilde	Clark Realty Capital, L.L.C.
P29	Pam Cressey	Private Citizen
P30	Dale Zehner, Chief Executive Officer	Virginia Railway Express
P31	Robert McLaren (Oral Testimony)	Private Citizen
P32	Larry Zaragoza	Private Citizen
P33	Neal McBride	Private Citizen
P34	Gerald Musarra	Private Citizen
P35	Patricia Tyson	Private Citizen
P36	Norm Starler	Private Citizen
P37	John Hurley	Private Citizen
P38	Sallie Lyons (Oral Testimony)	Private Citizen
P39	John Sperling (Oral Testimony)	Private Citizen
P40	Mark Gionet	Private Citizen
P41	Monica Thompson	Private Citizen
P42	Yolanda Nicholson	Private Citizen
P43	Earl Flanagan	Private Citizen
P44	Newman Howard	Private Citizen
P45	Joseph Bury	Towns at Manchester Woods Homeowners Association
P46	Dennis Steiner	NGA
P47	Linda Stone	Private Citizen
P48	John Sperling (Written Comments)	Private Citizen
P49	John Cooley, President	Civic Association of West Springfield Village
P50	Jodi Lasky	Private Citizen
P51	Arlene Dukanauskas	Private Citizen
P52	Catherin Rubino	Private Citizen
P53	Terry Bowers	Private Citizen
P54	Thomas Kays	Private Citizen
P55	Jerrold Allen	Alexandria Friends Meeting at Woodlawn
P56	Maggie Heninger	Private Citizen
P57	E.L. Tennyson	Private Citizen
P58	Sylvia Seegrist	Private Citizen
S1	Vivian Watts, Delegate 39 th District	Virginia House of Delegates

Table K-1
Commenters on the Draft EIS

Comment Number	Name and Title	Organization
S2	Ellie Irons, Program Manager	Virginia Department of Environmental Quality
S3	Marc Holma, Agricultural Historian	Virginia Department of Historic Resources
S4	Pierce Homer, Secretary of Transportation (Written Comments)	Virginia Department of Transportation (VDOT)
S5	Pierce Homer, Secretary of Transportation (Oral Testimony)	VDOT
S6	R.N. Harrington, Manager, Planning and Environmental Section	Department of Aviation (Virginia)

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Appendix K.2
Comments Received on the Draft EIS

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F1

MR. REAGAN: Thank you. My name is Paul Reagan and I serve as Senator Jim Webb's Chief of Staff. I want to thank you, Colonel Lauritson, for holding this public hearing on Fort Belvoir's draft EIS. As a member of the Senate Armed Services Committee, Senator Webb has asked me to convey to the members of this community that he shares their very serious concerns about the realignment of Fort Belvoir, and particularly, its traffic impacts. This was all mandated as by Congress in 2005.

Senator Webb has already begun working closely with Senator Warner, as well as Congressman Moran and Congressman Davis to lessen the harmful impacts of BRAC 2005 on Fairfax County, Prince William County, and surrounding communities.

As it's been pointed out repeatedly since the enactment of BRAC in 2005, without significant new resources for transportation by 2011, the road system in and around Fort Belvoir will fail. This will leave current residents and incoming employees at Fort Belvoir marred in traffic. To this end, Senator Warner stands ready to work closely with the Army, the Department of Defense, and state and local officials to direct additional resources to transportation improvements for Fort Belvoir and the surrounding community.

F1.1

There is the second aspect of the draft EIS that the Senators asked me to briefly comment on, and this pertains to the GSA Warehouse facility in Springfield. Senator Webb understands that this has been a particular priority for Congressman Moran and for Congressman Davis. He shares their assessment that the GSA Warehouse site holds enormous promise as a partial solution for the transportation challenges inherent in Fort Belvoir's realignment.

F1.2

To have some 70 acres of federal property at the endpoint of the blue line, gives us a unique opportunity to place more of the incoming jobs in a location that is convenient to one of the regions best transportation facilities; transit oriented development works.

Finally, while it is perhaps beyond the scope of the draft EIS, Senator Webb holds deep concerns about the time table for completion of this massive project. A realistic and dependable planning and construction schedule is essential to maintaining the public's confidence and the community's confidence in the realignment of Fort Belvoir.

F1.3

Again, thank you for holding this hearing and the Senator looks forward to working with all of you on the realignment of this facility. Thank you.

Ladies and gentlemen, our next speaker has arrived and whose district we meet tonight, I'd like to introduce Congressman Jim Moran; sir.

CONGRESSMAN MORAN: Thank you, Don. Tom and I have been voting and we just completed our votes, but we had a conflict so we decided we would split our time. There was a memorial service at Fairfax County Government Center. Tom represents three of the families who had children who were tragically killed at Virginia Tech, and so he's going out to the Government Center and I'm coming here.

His staff person, Bill Womack, is going to read his statement, but we had talked before coming out here and I want you to know that we are in agreement on this and we have been working together very closely on this issue, and we also voted against the BRAC recommendations. So as far as I can see, our positions are virtually identical.

So to some extent, I'm speaking for him, but Bill will give his actual statement, and I guess I should start by thanking you for hosting this, Gerry Hyland at Mount Vernon High School. I know that this is the Army's -- the Army is bringing it together, but the Mount Vernon area has been so well represented by you and by your colleague here, Supervisor Dana Kaufman.

We really do regret the fact that you will be leaving us, Dana, and specifically, you'll be leaving before the BRAC realignment is complete. I hope that's not the reason you're leaving, although, it would have been a fortuitous move if it is, but I know that you're retiring, but I also know we'll be able to work closely with your successor, but the fact is that we will miss you a great deal. You've brought wisdom and foresight to this debate. So I thank you and I thank your colleague.

Mr. Hyland, you represent the local government extraordinarily well, and I want to take a moment to thank Colonel Lauritson for his dedicated service and your outreach to the community, Colonel. There are many people here who are skeptical that the BRAC realignment can succeed, and in fact, I am one of them.

But you have put forth an honest effort to keep the community well informed of the challenges we face and I want you to know we do appreciate that, and I don't even blame you for any of it. In fact, I don't particularly blame the Army for a lot of it, I do blame the Defense Department, but I'll get into that in a moment.

The 2005 BRAC recommendations impact Northern Virginia like no other place in the world. I say the world, it sounds grandiose but there are a lot of changes that were occurring overseas. But none of them are as intensive, as massive, as what is happening at Fort Belvoir. My congressional district lost the equivalent of four major military bases. Nobody came close to that, and I know that Senator Warner is very much aware of that and Senator Webb, and I want to say that they have been very supportive of us, as well, particularly Senator Warner. Senator Webb, as you know, was just elected, but Senator Warner has been tremendous on this.

We are very much distinguished because this is the greatest displacement of jobs from least space, predominantly in Arlington, and the largest growth in relocated jobs at Fort Belvoir. I don't see the rationality in moving more than 9,000, well in Arlington, it was over 20,000 people, but 9,000 of them are coming here to Fort Belvoir.

Why you would move people that are working at a Metro station, using public transit in buildings that are functioning well, and even those that are not at a Metro station, you've got a brand new building in Reston that was just built for the National GI Spatial Agency with all of the security precautions that the military asked for, brand new building, and you're going to move hundreds of those people to Fort Belvoir. It doesn't make a lot of sense, but in fact, that's pretty much consistent with a lot of policy from DOD in the last few years. But I really take great objection to this and that's why both Mr. Davis and I voted against the BRAC recommendations. The idea that 23,000 defense personnel are scheduled to relocate here by 2011, and on top of that, we're going to have thousands of supporting contractors that follow them to this region.

It should be clear to everyone here that our biggest challenge in the BRAC realignment is the impact it will have on our already congested transportation system. As we all know, we have at least the second worst congestion in the entire nation, and it doesn't discriminate -- place, you know, what road are you traveling on or if you're in a hurry, there's no discrimination, everybody suffers from this congestion, don't they, Pierce, and we're working on it at the state level, but it's not going to be fixed any time soon, certainly not in time to alleviate this.

The average commuter in Northern Virginia loses hours every year to congestion, and that traffic threatens the variability of the federal government to function as well as the economy of this region. Without significant investment and an aggressive time table, it will be impossible to meet the requirements of BRAC without causing a state of chaotic congestion.

As part of the draft EIS, the Army Corps of Engineers identified 13 necessary transportation mitigation measures. You may have already discussed this, but I'm going to say it again because it needs to keep being emphasized, and in the Corps of Engineers words and I quote, "to maintain the transportation system's operational performance at an acceptable level of service and delay." What they consider to be acceptable is probably conservative, but these 13 measures are just necessary to maintain an acceptable level of delay.

Now, this credible analysis of the Corps, I guess we should be pleased that it justifies what we have been stating since the recommendations came down. We absolutely need major road improvements to make BRAC work, and without those improvements, the Army's own Engineering Corps says that, number one, in the areas immediately surrounding the EPG, severe congestion will last three to four hours every peak hour period. Access points to EPG will only be able to process between 40 to 50 percent of the projected peak hour demand for both the morning and evening commutes.

F2.1

Queuing of traffic from the access point to the EPG will back up onto I-95, we know that, and that queuing will extend the morning congested period between one and two hours. You're going to have a back up of as much as two hours on Interstate 95. In the evening peak period, this congestion will spread over several additional hours.

F 2.1
continued

If the main access point to the EPG is not completed, there will be only one road entrance point for all vehicular traffic, and thus, work arrivals will be spread out over an 11 to 12 hour period due to limited capacity. Think about that now. You could have as much as an 11 hour period of people trying to get to work. This is from the Army's own Corps of Engineers, bottlenecks resulting from BRAC traffic will negate the improvements made to regional congestion by the major transportation projects such as the Springfield interchange, Mixing Bowl, the I-95 fourth lane project, and the Wilson Bridge project.

We spent over half a billion dollars for the Mixing Bowl, we spent more than 2.6 billion for the Wilson Bridge, and we're going to spend more on the beltway and on what we call 395 -- the I-95 north and south road, and yet all of it is (off mike), it's negated if we can't fix this. Without proper action military readiness will also suffer after the BRAC realignment, there will be nearly 100 tenant organizations at Fort Belvoir, quoting Missile Defense Agency, the Defense DITRA, the Defense Threat Reduction, Nea National GeoSpatial Intelligence, Defense Logistics Agency -- are you able to keep up with me on -- holy smokes; the DLE and the Intelligence and Security Command, Edscha.

Now, that's one of the reasons why I can't blame the Army for not being able to, are prepared, or willing to fix this, because a lot of this is not Army, in fact, most of it. Most of the new people coming in are not Army, it's an Army base, but they're not Army, they are Department of Defense. Now, the agencies coming in are some of the most sensitive, operational, demanding, and technologically advanced activities in DOD. However, they are as vulnerable to the issue of traffic as any other employer, and these agencies cannot function if their employees can't get to work, and that's what the draft EIS tells us.

These agencies cannot function because their employees will not get to work unless very substantial infrastructure improvements are made. Now, the Environmental Impact Statement draft has taken the first step by identifying the necessary transportation improvements, but DOD has never indicated how these improvements will be paid for. In fact, in their next two fiscal year budgets, DOD has allocated zero funding for any of these off post transportation improvements.

The Commonwealth of Virginia and Fairfax County have expressed their willingness to contribute funding for the necessary transportation projects. However, DOD has the full and sole responsibility for creating this additional transportation burden in our region, and they are the ones who should shoulder their fair share of the costs. This was not a situation created by the state or the county, but by DOD, and that's why we think DOD should share the brunt of the costs.

I'm working with my colleagues on appropriations and the authorizing committees to force the Department of Defense to meet some of its funding responsibilities. The Armed

Services Committee personnel, their Chair, has told me he's receptive to doing this, and of course, we're talking with the appropriations people.

If the necessary roads are not significantly completed, I plan, and I think Tom does this well, to do whatever we possibly can to prevent the relocation of any employees to these new facilities, including reopening the BRAC statute or preventing the expenditure funds to relocating any workers.

We opened up BRAC for the first time, set the precedent with regard to Walter Reed, because it's unfair when you've got the brunt of returning veterans coming to that hospital for that hospital to be treated as though it's going to be closing down. When you're getting the most seriously injured veterans coming right now, you need a first class facility. So it made sense for us to put language in and we're going to insist on this language that Walter Reed stay open while the Iraq war is going on, and of course, what we said was that it'll stay open permanently. But it certainly will stay open as long as we're having this influx of wounded veterans in need of first class care.

So BRAC's opened anyway, and I don't think that we can possibly bring this number of people in, accommodate them by 2011, and so as far as I'm concerned, we're going to do everything we can to delay the implementation of BRAC until after 2011, until after DOD has fulfilled its responsibility.

Now, I've got one other issue I want to raise. One primary concern with this draft EIS, and this is a criticism of it, is the absence of the GSA Warehouse site. Congressman Davis and I have worked very hard, as my colleagues on the Fairfax County Board know, to incorporate this into the planning for the BRAC relocation because it's located right next to the Springfield Franconia Metro Station with VRE access. It makes so much sense to build at that Metro and VRE station. It provides the only opportunity to conclude public transportation planning in the Fort Belvoir realignment, and when transportation is the number one concern, and the Army certainly recognizes that, you do, Colonel, and Don, you're fully in agreement here, it's the number one concern.

F2.2

Well, then it only makes sense to try to alleviate traffic as best we can by getting those cars off of the road and onto public transit. The GSA Warehouse site needs to be included in this planning, and the inclusion of that site would split the relocation of employees between the EPG and the GSA, and doing so would ease the local traffic problems on secondary roads, roads that are going to be the most clogged in rush hour.

It's a common sense measure, and so I think it really has to be included in our planning. But despite repeated meetings in our Capital Hill offices, we've met in my office, we've met at Tom's office, we -- Senator Warner has hosted a number of meetings, we brought GSA and Army officials to the same table, but yet we can't make it a reality. DOD could administratively transfer that land today by helping the GSA move their tenants to other locations and include the site in the final Environmental Impact Statement. But these long discussed plans haven't come for wishing.

As I have to say, I think DOD's position has been somewhat intractable and that, unfortunately, is symptomatic of much of DOD's approach, which hasn't made a whole lot of sense with regard to this aspect of the BRAC policy, and I find it frustrating, disappointing, and I think most appropriate to be changed in legislation.

F2.2
continued

That's not on this, but they – I'm going to conclude by saying despite the best efforts of Colonel Lauritson and his team of planners and developers, I do not believe that the BRAC realignment will be completed by the 2011 deadline, and since that is the case, I think we have to insist that the Department of Defense reconsider its approach to rushing this effort through.

F2.3

The future vitality of this region, its high quality of life standard and its relationship with the Army, is dependent on a thoughtful approach to BRAC that is supported by adequate resources. I hope the Army takes this sentiment and that of the public sentiment that is offered here tonight back to the Pentagon to ensure that the Fort Belvoir realignment is done right, just done by deadline. Thank you.

MR. CARR: Representing Congressman Tom Davis will be Bill Womack, Bill.

MR. WOMACK: Good evening, ladies and gentlemen. Like Congressman Moran said, Congressman Davis is attending a candlelight vigil for the victims from Virginia Tech. He asked me to come and read his statement in his place. I will do so and I will keep it in the first person because I'm not quite smart enough to change these pronouns on the fly.

If he were here, I think that he would say that everything has been said; just not everyone has said it yet. So I'll do my best to be succinct, but if you'll indulge me one thing here, as a staffer, I'd just like to point out another staffer, that our office has always appreciated working with, and that's Don Carr. He's a great civil servant and represents all of the government employees in our district quite well, and Tom also did specifically direct me to point out the close working relationship that we have with Mr. Moran, and I think that this will manifest itself in the fact that you might hear some of the same phrases in our statements.

I'll begin by noting that I argued against the Department of Defense's recommendations to the base realignment and closure commission. I also voted against the legislation approving these recommendations when it came before the House of Representatives. I did so for a number of reasons, not the least of which was my belief that DOD had not adequately considered the ramifications of transferring 22,000 new personnel to Fort Belvoir within a six year time frame.

Along with Governor Kaine, Senator John Warner, Senator Jim Webb, and representative Moran, I've worked closely with the Army to make BRAC implementation as smooth as possible; that is my responsibility as a representative. But let me be clear, I have many obligations with respect to BRAC.

First, my constituency resides in the Fort Belvoir vicinity are understandably worried about the changes BRAC will bring to their communities. Given the sheer size of the pending realignment, there is no menu of options that will prevent all adverse effects. My charge is to therefore ensure the federal government does everything it can to mitigate the effects of BRAC, thereby preserving the quality of life of those directly impacted.

I must also look after the interest of those men and women destined to work on a post BRAC Fort Belvoir. Well, they might not currently reside in the area; they are faced with the prospect of dealing with the outcomes of our efforts. Some scenarios depict commutes stretching for hours in the morning and evening. This would represent an unacceptable burden on these military and civilian employees dedicated to protecting our country.

My final responsibility is to the American people at large. The DOD agency slighted to relocate to Fort Belvoir are some of the most sensitive, operationally, demanding, and technologically advanced in the Armed Forces. The work they do is vital to the defense of our nation. It is not inconceivable that these agencies would experience significant

difficulties in accomplishing their missions if BRAC is not implemented with care. Agencies cannot function if their employees cannot get to work.

In reviewing the draft EIS, I've identified a number of flaws. The draft is based on the assumption that the 2011 deadline will be met and that a number of significant transportation improvements will have been constructed.

During the hearing I chaired last August at Rolling Valley Elementary School, I expressed my belief that the Army's five year timeline was impractical, a view I maintain. As a former county supervisor, chair of the county board, and in my current position as a member of Congress, I have significant experience dealing with major transportation projects.

F3.1

The 13 recommended in the draft DIS can normally be expected to take over 10 years, from conception to ribbon cutting. We have less than five until the 2011 deadline passes. Reinforcing my skepticism is the fact no one has stepped forward to identify funding sources for these projects. The one for which substantial funding has been identified, the completion of the Fairfax County Parkway, is still stalled despite assurances that disagreements over environmental issues would finally be resolved. It is wrong for the Army to limit itself to those options that could theoretically be in place by September 2011, since it is unlikely that deadline will be met.

It is also disingenuous for DOD to seek shelter behind the BRAC statute since they originally requested all of these realignments. In effect, DOD got what it asked for. All options must remain on the table, in the interest of good planning and the long term health of the region. The draft EIS also relies too heavily on the engineering proving ground as the future location of DOD activities.

F3.2

If BRAC is an exercise of getting ten pounds of stuff in a five pound wrapper, EPG is like getting the camel through the proverbial eye of the needle. EPG currently has no supporting infrastructure. How can it accommodate 18,000 personnel and the associated commutes in less than five years? Under the preferred alternative, commuters to EPG will experience unacceptable delays getting to and from their work places. As the draft says, these delays will likely extend onto I-95, thereby degrading traffic flow on that vital artery.

Since I learned of the Army's plans for EPG, my colleagues and I have sought to make the GSA Warehouse facility in Franconia available for BRAC related purposes. This property is located next to existing Metro and VRE stations, thereby maximizing existing transit options. Moreover, it could reduce the number of personnel on EPG, which should be a primary goal given the limited entrance and egress options.

F3.3

As part of this effort, my colleagues and I included a provision in the FY07 DOD Authorization Bill requiring the Army to study the feasibility of using the GSA property. Last night, I received this report. The crocks of which is that up to 9,000 personnel could

be located on the property, but it would require additional transportation improvements and it would not be complete until after 2011.

F 3.3
continued

I do not view the 13 transportation projects listed in the draft as a complete list. It is likely additional measures will be needed in order to accommodate BRAC. As I have said above, the deadline should not disqualify the GSA property from consideration. The draft DEIS lists a number of steps that could be taken in order to mitigate the effects of BRAC. These include road projects mentioned above, expanded transit options, a transportation management coordinator, and other congestion management tactics. These could indeed provide mitigation, but only if somebody pays for them.

I expect DOD to do its part in paying for the infrastructure needs created by BRAC. With Fort Belvoir in mind, I have passed legislation clarifying DOD has the ability to share the cost of transit projects, not just road projects, as part of the Defense Act Sets Roads Program. Unfortunately, I have yet to receive assurances from the Army that it will dedicate resources in a meaningful way.

F 3.4

My final comment regarding transportation will be this. The personnel should move to Fort Belvoir only once the necessary infrastructure is in place. Absent this approach, the effects on the road system in Northern Virginia and the harm to surrounding neighborhoods will be unacceptable. The future of the Northern Virginia region depends on the successful implementation of BRAC at Fort Belvoir. The Army must be willing to dedicate the resources needed to build the necessary infrastructure. It must also conduct sound planning, focusing on the long term health of the fort and the region, rather than affixed on attainable deadline. I look forward to continuing to work with the Army to achieve these goals. Thank you.



U.S. Department
of Transportation
**Federal Highway
Administration**

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(804)775-3320

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Richmond, Virginia 23240

May 1, 2007

Mr. Patrick McLaughlin
Fort Belvoir Directorate of Public Works
Environmental and Natural Resources Division
Building 1442
9430 Jackson Loop
Fort Belvoir, Virginia 22060

Subject: **BRAC DEIS for Ft. Belvoir**

Dear Mr. McLaughlin:

The Federal Highway Administration (FHWA) appreciates the opportunity to review the Draft Environmental Impact Statement (DEIS) for the Implementation of 2005 BRAC Recommendation and Related Army Actions at Fort Belvoir, Virginia. The DEIS recognizes the significance of the proposed action on transportation but does not include an environmental analysis of the transportation improvements identified as potential mitigation measures. Based on numerous statements in the DEIS which are noted below, it is clear to FHWA that improvements to the transportation system will likely need to occur to address existing traffic congestion in the area and the increased traffic resulting from the Belvoir BRAC. As you are aware FHWA cannot adopt the EIS as the basis for any subsequent NEPA approvals for modifications to the highway system requiring our approval because the NEPA analysis for those actions was not included in the EIS. Future transportation improvement identified as mitigation may require their own NEPA analysis in addition to the planning, programming, design, and construction steps that need to be considered for any proposed transportation improvement.

F4.1

F4.2

FHWA would like to offer the following comments that relate to transportation issues in the BRAC DEIS for Ft. Belvoir with emphasis on the identified preferred alternative.

General

The DEIS recognizes the significance of the action on transportation. In Section ES.6.2 Transportation, "The BRAC action would be expected to have significant effects on the transportation system, regardless of the land use alternative selected." The document states, "Any significant traffic effects as a result of the BRAC action *should* be mitigated with transportation improvements, such that the negative effects become minor or negligible." The DEIS identifies a series of improvements that "would be *needed* to maintain the transportation system's operational performance at an acceptable level of service and delay." The Army's "order-of-magnitude" costs for the 13 mitigation actions are estimated to be \$458 million for the Preferred Alternative. **Comment:** The EIS should address a potential plan of action regarding project development, design, additional NEPA, if required, and implementation of the identified transportation improvements.

F4.3

The DEIS recognizes impacts on the transportation network as a cumulative effect that "would be mitigated through roadway improvements by the developers" (P. ES-16) without identifying the developers. **Comment:** The EIS should define who are the "developers" and describe how they will implement the "mitigation."

F4.4

Road infrastructure description/quantities (P. 2-20) appear to include only work within the base: 92 acres clear/grub, pavement demolition (18.6 acres), road surfaces (80 acres), 1 bridge (Accotink Creek), 2 bridge replacements (Dogue Creek, Accotink Creek). **Comment:** The EIS should clarify whether or not these numbers include any off-base work.

F4.5

In reference to needed transportation improvements, the DEIS indicates (P 4-30) "Detailed operational analyses of any proposed mitigating actions will be conducted as design development permits to support studies required by VDOT and FHWA. Typically, these studies are completed following the completion of an EIS..." **Comment:** However, in the case of a large complex project where the selected alternative is not clear a framework or roadmap of additional studies and potential NEPA requirements should be included.

F4.6

Affected Environment

Transportation is given substantial attention in about 110 pages in this chapter of the document and in Appendix B. In the Conference Report on the National Defense Authorization Act for Fiscal Year 2007, the conferees noted the significant impact on the transportation infrastructure and the NHS for both the Belvoir and Quantico sites, and they identified transportation "Items of Special Interest" and provided specific instructions on factors to address in the DEIS. A listing of projects "assumed to be complete" by 2011 is also included, referencing VDOT's 6-year plan (which lists a 4-lane FCP from Rolling to Fullerton), the Fairfax County's CIP which contains several spot improvements and EFLHD's Telegraph connector road.

Comment: FHWA appreciates the high level of attention given to transportation in the "affected environment" section of the document.

Environmental Consequences (Regional)

In this DEIS, increases in traffic congestion are treated as impacts of the BRAC move. In some sections, the traffic impacts are downplayed, on the regional level:

"In lay terms, what is happening is that when the people stop reporting to Crystal City, Reston, Bethesda, and so on, those offices are filled by other jobs and different people (productions) who report to work in those locations (attractions), and this occurrence draws trips away from the areas surrounding Fort Belvoir. The trips are rebalanced and the effect is **not as great as might be perceived by some**. This phenomenon is often described as the "bean bag effect." Adding more trips in the areas surrounding Fort Belvoir pushes trips out of the other areas; this effect is similar to sitting on a bean bag chair and changing its shape. The total volume of the bean bag (total regional trips) does not change, but the shape does..." (P. 4-37)

F4.7

"From the regional perspective, implementation would produce a **combination of minor (negligible) adverse and beneficial effects.**" (P. 4-72)

"The total number of trips within the region **remains fixed** as the regional employment total is held constant; it is the redistribution of employment that causes a shift in travel patterns." (P.4-75)

For air quality: "Implementing the Preferred Alternative and the realignment of Fort Belvoir would decrease both the number of vehicles and the total VMT within the region. In turn, regional motor vehicle emissions would decrease." (4-155)

Comment: Based upon the information provided, we cannot confirm the above conclusions. These assumptions may ultimately need to be verified through an update to the MWCOG long range transportation plan and air quality analysis which would include the new land use assumptions and the necessary roadway improvements.

Environmental Consequences (Local)

The document does recognize and thoroughly discloses the more serious adverse effects on the local level, for example:

"Long-term significant adverse effects would be expected. Implementing the Preferred Alternative, when compared to the No Action Alternative ... would worsen traffic conditions in the immediate vicinity of Fort Belvoir." (P. 4-72)

Regarding the shifting of travel patterns to the South to mimic the current distribution at the Fort: "The consequence of the shifting travel patterns to the south is that traffic to Fort Belvoir (including EPG) northbound on I-95 would represent a larger portion of the overall traffic flow. **Current highway facilities to the south would constrain the traffic flows if adequate roadway capacity is not provided.**" (P. 4-75)

For the Preferred Alternative: "The analyses assumed completion of the I-95 Fourth Lane Project. Even with the completion of the widening project, **the hours of congestion on I-95 are expected to increase by 30 to 45 minutes.** The duration of congestion along U.S. Route 1 would increase by approximately 30 minutes over the No Action Alternative conditions under the Preferred Alternative if there is no widening of U.S. Route 1. **Along the Fairfax County Parkway east of I-95, the duration of congestion would likely increase by an hour.**" (P. 4-82)

"In the areas immediately surrounding EPG, **severe congestion lasting 3 to 4 hours** would occur if mitigating actions, including transportation improvements, are not taken... **Queuing of traffic from the access point off the Fairfax County Parkway adjacent to EPG can be expected to back up onto the I-95 corridor.** This queuing would translate into an extension of the AM congested period by over an hour, **up to 2 hours**... If the Fairfax County Parkway segment through EPG is not constructed as per the currently funded improvements, then the sole access to EPG will be via Backlick Road. Providing only this single access point would require that work arrivals be spread out over an **11 to 12-hour period**, due to limited capacity on Backlick Road." (P. 4-83)

"The current approved plan for the Fairfax County Parkway through EPG would yield an access capacity of approximately 2,000 to 3,000 vph, well below the forecasted demand of 5,600-6,200 vph to the EPG site. **This demand, if left unserved, would cause severe congestion on roadways surrounding EPG, including I-95, which would affect the regional traffic through the study area.** Additional capacity and access points would be **required** to mitigate this effect." (P. 4-83)
Under **Mitigation:** "Implementing the Preferred Alternative would result in significant adverse effects to the transportation system with respect to congestion and increased travel time. These effects would lead to reduced employee productivity, higher commuting costs, and degradation of quality of life. These effects would not be limited to personnel at Fort Belvoir. Through commuters and the local

F48

community would also be affected." (P. 4-84) The DEIS describes 13 proposed projects to "mitigate" the adverse effects of the BRAC action. No environmental analysis of these projects is provided.

Comment: As noted above, based on our review of the DEIS, the NEPA coverage of the roadway improvements identified as potential mitigation is lacking. If your plan is to proceed with additional or follow-on NEPA documents for transportation improvements, an overview of known environmental issues should be included in your plan for subsequent studies.

Conclusion

FHWA is committed to working with the Army to address our concerns. We recognize the substantial attention paid to transportation issues in the document. The 110-page Transportation section in the Affected Environment does a thorough job of analyzing the existing conditions and considers appropriate plans and programs for currently proposed improvements. As noted above, additional consideration needs to be given to the environmental impacts of the needed transportation improvements to ensure that they are in place to serve the staff being relocated to Fort Belvoir. We urge you to include a framework for and commitment to additional studies and NEPA documentation that will be required to implement the necessary transportation improvements. We look forward to working with you on this important project.

F49

Sincerely yours,

Kenneth R. Myers
for Roberto Fonseca-Martinez
Division Administrator



IN REPLY REFER TO:

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Custom House, Room 244
200 Chestnut Street
Philadelphia, Pennsylvania 19106-2904



April 18, 2007

ER 07/184

Mr. Patrick McLaughlin, Chief
Fort Belvoir Directorate of Public Works
Environmental and Natural Resources Division
9430 Jackson Loop, Building 1442
Fort Belvoir, Virginia 22060-5116

RE: Draft Environmental Impact Statement: Implementation of Base Closure and
Realignment (BRAC) Recommendations and Related Army Actions at Fort Belvoir,
Virginia

Dear Mr. McLaughlin:

The Department of the Interior (Department) has reviewed the above-referenced DEIS and offers the following comments.

As partial mitigation for this project, the Department recommends completion of pedestrian, bicycling and water trail networks as segments of the Potomac Heritage Scenic Trail between Mount Vernon and the Occoquan National Wildlife Refuge. Our recommendation includes construction of a segment of the Potomac Heritage National Scenic Trail similar in function to the plan completed by the U.S. Army Corp of Engineers in 1996. (See, e.g., Eglin AFB and Avon Park AFR along the Florida National Scenic Trail.) Completion of the network will help to address the increased demand for recreational opportunities resulting from implementation of the BRAC recommendations, as well as providing transportation alternatives in the vicinity of the post. In particular, the network should include a non-motorized connection to and including the planned U.S. Army Museum, contributing to the network of nationally-significant sites in the Trail corridor.

F5.1

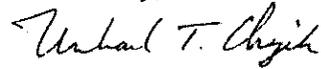
Because some employees at the post and surroundings areas might utilize walking, jogging or biking as a form of transportation, the Department proposes the addition of a section titled "Non-Motorized Transportation" on page ES-20 within the section heading "ES 8.1 Transportation" and in relevant chapters thereafter. Mitigation would require coordination and planning with Fairfax County agencies, the Metropolitan Washington Council of Governments, and other agencies followed by construction of additional pedestrian and bicycling facilities in the region.

F5.2

The Department has a continuing interest in working with the Army to ensure that impacts to resources of concern to the Department are adequately addressed. Thank you for the opportunity

to review the DEIS. If you have any questions, please contact Susan Hinton, National Park Service, National Capital Region, at 202-619-7106.

Sincerely,



Michael T. Chezik
Regional Environmental Officer

References

Federal Highway Administration, *Potomac Heritage National Scenic Trail Alignment Study: Fairfax County, Virginia: Final Report*, (Sterling, Vir.: Federal Highways Administration Eastern Lands Highway Division, 2004)

Metropolitan Washington Council of Governments, *Priorities 2000: Metropolitan Washington Greenways* (Washington, D.C.: National Capital Region Transportation Planning Board, MWCOG, 2001)

Northern Virginia Regional Commission, *Implementation Plan for the Potomac Heritage National Scenic Trail in Fairfax County* (Annandale, Vir.: Northern Virginia Regional Commission, 2002)

cc:

S. Hinton, NPS, Washington, D.C

E. Davis, FWS, Philadelphia, PA

L. Chapman, NPS, Philadelphia, PA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

May 1, 2007

Mr. Patrick McLaughlin
Fort Belvoir Directorate of Public Works
Environmental and Natural Resources Division
Building 1442
9430 Jackson Loop
Fort Belvoir, Virginia 22060

Re: Draft Environmental Impact Statement for Implementation of 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia (CEQ# 20070071)

Dear Mr. McLaughlin:

In accordance with the National Environmental Policy Act of 1969 and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement for Implementation of 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia. As a result of this review, EPA has assigned this Draft Environmental Impact Statement (DEIS) a rating of EC-2 (Environmental Concerns/Insufficient Information), which indicates that we have environmental concerns regarding the proposal and that there is insufficient information in the document to fully assess the environmental impacts of the project. A copy of EPA's ranking system is enclosed for your information.

FG.1

The BRAC realignment at Fort Belvoir involves two important considerations. First, the post's current master plan does not encompass the Environmental Proving Ground (EPG) because of past intentions to dispose of that 807-acre area for other development. Second, the proposed increase in personnel represents the largest relocation of personnel in the BRAC 2005 round. Approximately 7 million square feet of new and renovated facilities and approximately 7 million square feet of parking must be ready for use by September 15, 2011. Thus, the DEIS serves the dual purpose of evaluating the potential environmental impacts of two proposals at Fort Belvoir—the update of the land use plan of the post's real property master plan (RPMP) and implementation of the base realignment.

The Department of the Army (Army) considers the Preferred Alternative which emerged as a hybrid of three conceptual development strategies. The DEIS evaluates four land use plan alternatives and four alternatives for implementation of the BRAC realignment. EPA's comments focus on the Preferred Land Use Alternative/Preferred Alternative for BRAC



Implementation. Specific concerns pertain to eliminating the Environmentally Sensitive land use category and impacts to natural resources, vegetation, endangered/threatened/sensitive species, water resources, and soils.

Land Use Plan Update

The Preferred Alternative land use plan would aggregate land use categories in a way that reflects and supports the evolution in Fort Belvoir's mission. The proposed land use designations simplify and consolidate the existing 1983 land use categories into other broadly defined categories providing greater flexibility for future development without having to confront compatibility. These designations are Airfields, Community, Industrial, Residential, Training, Professional/Institutional, and Troup.

The Community category includes safety clearance, security areas, water areas, wetlands, conservation areas, resource protection areas (RPAs), forest stands, and former training areas. As stated on page 4-19, "At both EPG and South Post, new development and renovations would, with minor exception (e.g. minor wetlands), take into consideration areas currently identified for environmental preservation and conservation." Page 4-267 states that "Areas designated Outdoor Recreation or Environmentally Sensitive under the 1983 land use plan (except for the SNAs), if changed to Community, might remain as outdoor recreation areas or environmentally protected buffer areas but could be used for purposes less protective of natural vegetation." Page 4-268 also states that land redesignated as Range/Training could be less protective of natural vegetation than a specific Environmentally Sensitive land use designation. In addition, land use designations of Professional/Institutional or Residential support development which could have adverse consequences on vegetation in an environmental sensitive area.

Since the Environmental Sensitive land use category from the 1983 plan would not be carried forth to the revised land use plan, there is concern that this change runs the risk of undermining environmentally sensitive areas that are not necessarily labeled a "high-value resource" but are nonetheless environmentally sensitive. The fear is that the revised land use plan will not allow for sound use of physical and natural resources at the post with respect to future land use requirements. This land use change can only secure protection to the three Special Needs Areas: the Jackson Miles Abbott Wetland Refuge (JMBWR), Accotink Bay Wildlife Refuge (ABWR), and the Forest and Wildlife Corridor. Therefore, environmentally sensitive areas are not protected by the proposed land use plan.

F6.2

Natural Resources

Page 4-271 states that "Approximate acreages of natural resources that could be directly affected under the proposed action are 21 acres of the Environmental Quality Corridor (EQC), 2 acres of wetlands, 6 acres of riparian buffers, and 14 acres of RPAs.

The FEIS should identify the location of the proposed projects and the natural resources that they impact. The specific resource impacted should be identified. A map depicting the proposed projects in relation to the impacted natural resources should also be provided. The

F6.3



impacted wetlands should be identified and the functional value provided. Impacts to wetlands should be avoided or minimized whenever possible. The FEIS should also discuss how the impact to these natural resources will affect the water resources in the impacted areas.

Section 4.8.1.3 identifies Rare Plant Communities that are either very rare or extremely rare ecological communities that exist on Fort Belvoir's Main Post. The FEIS should discuss the potential impacts (if any) to these communities and specify the size of these ecological communities.

One area mentioned in this section is a tidal hardwood swamp. It is important to note that forested wetland systems act as natural filters and sediment traps and absorb flood waters. They provide vital ecological functions that are critical to several wetland dependent animal and plant species. This type of wetland system is vulnerable to a variety of human practices, such as agriculture, urbanization, and forestry. Therefore, wetland impacts from human activities should be avoided to the maximum extent practicable and be properly protected. EPA's mandates include the preservation of these environmentally significant resources.

FL.4

Vegetation

The DEIS states that the large amount of development associated with the Preferred Alternative would require the conversion of much vegetated areas on the Main Post and EPG to developed areas. Development would have long-term moderate adverse effects because it could increase habitat fragmentation and reduce habitat connectivity, increase the occurrence of invasive species in fragmented habitats, and could reduce the overall ecological integrity of the installation's natural habitat. Table 4.8-4 lists the vegetative community types and the total approximate acres of projects proposed in the area of the post. However, it is not clear if the approximate acres of projects proposed in the area is equivalent to the approximate acreage of vegetative community impacted. The FEIS should specify where the forest removal is to take place in the designated area of the post, provide the acreage and kind of vegetative community impacted, and discuss if habitat loss has been accounted for with particular attention to impact on sensitive species.

FL.5

Endangered, Threatened, and Sensitive Species

As stated on page 4-270, "A total of 179 acres of Partners in Flight (PIF) habitat, 8 acres of sensitive flora habitat, and 6 acres of sensitive fauna habitat would be lost under the alternative." Projects proposed on EPG could reduce the quantity of habitat for the following PIF species: field sparrow, prairie warbler, wood thrush, and worm-eating warbler. The small whorled pogonia has been found on the western portion of EPG and it is the only known location of the species in Fairfax County.

A project for the South Post, a family travel camp, is proposed for areas identified as occasional-use foraging areas for bald eagles. The family travel camp area is also an area where seeps of the type that support the northern Virginia well amphipod occur, and indirect impacts on that species could occur from development. Road improvement projects pass through wood turtle habitat.



The Endangered Species Act (ESA) provides for the listing of endangered and threatened species of plants and animals as well as the designation of critical habitat for listed species. The ESA prohibits the taking of any listed species without (for federal agencies) an "Incidental Take Statement." The definition of "taking" includes injury and harassment. The ESA also requires federal agencies to exercise their authorities, in consultation with designated agencies (in effect, the U.S. Fish and Wildlife Service and National Marine Fisheries Services as appropriate), to conserve endangered species. It further requires federal agencies to consult with these agencies on any action that may jeopardize the continued existence of any threatened or endangered species, which has been interpreted by regulation to require consultation for any action that "may affect" such species. For actions that may adversely affect species, the regulatory agencies may recommend mitigation. Such mitigation is required if an agency action would otherwise jeopardize the species existence, and it may be required if agency action will result in a take and, therefore, require an incidental take authorization.

F6.6

The FEIS should indicate where the impacted species are in relation to the proposed projects. The most recent state and federal threatened and endangered species coordination letters should be included in the FEIS.

Water Resources

As noted on page 4-190, "...the placement of fill in association with stream crossings could result in an increase in the topography in the vicinity of the Accotink Creek drainage and its tributaries." The FEIS should discuss what impacts this change in topography may have on drainage (if any). It is requested that the number, size and use of the stream crossings proposed be provided. It is noted on page 4-193 that one new bridge over the Accotink Creek is proposed which would also result in direct impacts to soils associated with the construction of piers and footings. The FEIS should assess the potential impacts to the water quality of the stream and the potential impacts that could result from the stream crossings and bridge. Impacts to biological resources should also be noted. Page 4-191 states that, "Crossings of Accotink Creek ... could require drilling or small amounts of blasting to manipulate the bedrock features adjacent to the creek." Potential impacts from this activity should be addressed in the FEIS.

F6.7

Soils

Page 4-191 states, "Soil types that could support prime farmlands occur within the project area. However, since the lands within Fort Belvoir are in urban use or otherwise irreversibly committed to other uses, the prime farmland designation does not apply." If there is any farmland in the study area, it should be evaluated and classified. Prime and unique farmland impacted by the project should be delineated regardless of the current state of cultivation. These efforts should be coordinated with the National Resources Conservation Service. Impacts to prime and unique farmland should be avoided. However, if this is not possible the FEIS should explain the implications of developing the prime and unique agricultural land with respect to the Farmland Protection Policy Act as well as describe the mitigation measures for those impacts.

F6.8



Page 4-193 states that, "Infrastructure would also include installation of approximately 25,000 linear feet of perimeter fencing, which would require clearing and grubbing of an area approximately 40 feet wide throughout the length of the fence." The FEIS should specify what is being cleared, identifying soils and vegetation.

F6.9

Energy Efficiency

This project presents an excellent opportunity to implement the President's Executive Order 13423: Strengthening Federal Environment, Energy and Transportation Management by incorporating energy efficiency into the renovation and construction efforts for this project. Enclosed with this letter is information that EPA recommends the Army consider when planning the renovation/construction phase of this project.

F6.10

Thank you for providing EPA with the opportunity to review this project. If you have questions regarding these comments, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765.

Sincerely,

/S/

William Arguto
NEPA Team Leader

Enclosures (2)



Environmental Impact Statement (EIS) Rating System Criteria

RATING THE ENVIRONMENTAL IMPACT OF THE ACTION

LO (Lack of Objections) - The review has not identified any potential environmental impacts requiring substantive changes to the preferred alternative. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposed action.

EC (Environmental Concerns) - The review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact.

EO (Environmental Objections) - The review has identified significant environmental impacts that should be avoided in order to adequately protect the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). The basis for environmental Objections can include situations:

1. Where an action might violate or be inconsistent with achievement or maintenance of a national environmental standard;
2. Where the Federal agency violates its own substantive environmental requirements that relate to EPA's areas of jurisdiction or expertise;
3. Where there is a violation of an EPA policy declaration;
4. Where there are no applicable standards or where applicable standards will not be violated but there is potential for significant environmental degradation that could be corrected by project modification or other feasible alternatives; or
5. Where proceeding with the proposed action would set a precedent for future actions that collectively could result in significant environmental impacts.

EU (Environmentally Unsatisfactory) - The review has identified adverse environmental impacts that are of sufficient magnitude that EPA believes the proposed action must not proceed as proposed. The basis for an environmentally unsatisfactory determination consists of identification of environmentally objectionable impacts as defined above and one or more of the following conditions:

1. The potential violation of or inconsistency with a national environmental standard is substantive and/or will occur on a long-term basis;
2. There are no applicable standards but the severity, duration, or geographical scope of the impacts associated with the proposed action warrant special attention; or
3. The potential environmental impacts resulting from the proposed action are of national importance because of the threat to national environmental resources or to environmental policies.

RATING THE ADEQUACY OF THE ENVIRONMENTAL IMPACT STATEMENT (EIS)

1 (Adequate) - The draft EIS adequately sets forth the environmental impacts(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

2 (Insufficient Information) - The draft EIS does not contain sufficient information to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the proposal. The identified additional information, data, analyses, or discussion should be included in the final EIS.

3 (Inadequate) - The draft EIS does not adequately assess the potentially significant environmental impacts of the proposal, or the reviewer has identified new, reasonably available, alternatives, that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. The identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. This rating indicates EPA's belief that the draft EIS does not meet the purposes of NEPA and/or the Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS.

ENERGY EFFICIENCY

The Federal government has made significant progress in improving environmental and energy performance through a series of executive orders, Memoranda of Understanding, and other guidance. Executive Order (EO) 13423: Strengthening Federal Environmental, Energy, and Transportation Management, intends to build on that body of work and success by integrating and updating prior practices and requirements into a cohesive, strategic approach to further ensure enhanced performance and compliance with statutory and other legal requirements. Section 2 of the EO directs Federal agencies to implement sustainable practices for:

- Energy efficiency and reductions in greenhouse gas emissions.
- Use of renewable energy.
- Reduction in water consumption intensity.
- Acquisition of green products and services.
- Pollution prevention, including reduction or elimination of the use of toxic and hazardous chemicals and materials.
- Cost-effective waste prevention and recycling programs.
- Increased diversion of solid waste.
- Sustainable design/high performance buildings.
- Vehicle fleet management, including the use of alternative fuel vehicles and alternative fuels and the further reduction of petroleum consumption.
- Electronics stewardship.

Each agency shall use a variety of energy and water management strategies and tools to meet the goals of EO 13423. These strategies and tools include, but are not limited to, the following:

Distributed Generation

Where life-cycle cost effective, each agency shall implement distributed generation systems in new construction or retrofit projects, including renewable systems such as solar electric, solar lighting, geo (or ground-coupled) thermal, small wind turbines, as well as other generation systems such as fuel cell, cogeneration, or highly efficient alternatives. In addition, agencies are encouraged to use distributed generation systems when a substantial contribution is made toward enhancing energy reliability or security.

Metering

To the maximum extent practicable, agencies should install metering devices that measure consumption of potable water, electricity, and thermal energy in Federal buildings and other facilities and grounds. Data collected shall be incorporated into Federal tracking systems and be made available to Federal facility managers. Agencies should consider inclusion of metering requirements in all Energy Savings Performance Contracts (ESPC) and Utility Energy Services Contracts (UESC), as appropriate.



Auditing

Agencies should conduct energy and water audits of at least 10 percent of facility square footage annually and conduct new audits at least every 10 years, thereafter. This audit requirement can be met by audits done in conjunction with ESPC or UESC projects.

Energy Star® Tools

For applicable facilities, agencies should meet Energy Star® Building criteria, and score the energy performance of buildings using the Energy Star® Portfolio Manager rating tool as part of comprehensive facility audits. Agencies may use the Energy Star Portfolio Manager rating tool to track energy and water use in all facilities.

Energy Purchasing

Agencies should purchase electricity and thermal energy from sources that use high efficiency and low-carbon generating technologies in order to reduce greenhouse gas intensity to the extent possible.

Water Efficient Products

Where applicable, agencies should purchase WaterSense (SM) labeled products and choose irrigation contractors who are certified through a WaterSense labeled program. EPA's WaterSense program is a voluntary public-private partnership that identifies and promotes high performance products and programs that help preserve the nation's water supply.

Procurement

Each agency shall give preference in their procurement and acquisition programs to the purchase of:

- Recycled content products designated in EPA's Comprehensive Procurement Guidelines.
- Energy Star® products identified by DOE and EPA, as well as Federal Energy Management Program (FEMP) designated energy-efficient products.
- Water-efficient products, including those meeting EPA's WaterSense standards.
- Energy from renewable sources.
- Biobased products designated by the U.S. Department of Agriculture in the BioPreferred Program.
- Environmentally preferable products and services, including Electronic Product Environmental Assessment Tool (EPEAT) registered electronic products.
- Alternative fuel vehicles and alternative fuels required by Energy Policy Act (EPAct).
- Products with low or no toxic or hazardous constituents, consistent with Section 7(a) of the EO.
- Non-ozone depleting substances, as identified in EPA's Significant New Alternatives Program.



Energy Efficient Standby Power Devices

When purchasing commercially available, off-the-shelf energy-consuming products, agencies shall purchase products that use no more than one watt of standby power as defined and measured by International Electrotechnical Commission (IEC) code 62301, or otherwise meet FEMP specifications for low standby power consumption. If FEMP has not specified a standby power level for a product category, agencies shall purchase products with the lowest standby power consumption available. Agencies shall adhere to these requirements, when life-cycle cost effective and practicable, and where the relevant product's utility and performance are not compromised as a result.

Recycling Programs

Each agency shall maintain waste prevention and recycling programs in all of its facilities in the most cost-effective manner possible, and where appropriate, leased facilities and facilities managed by the General Services Administration (GSA). In GSA managed facilities, GSA shall manage the recycling program, but agencies shall work with GSA to ensure that there is a recycling program that meets the agencies' needs.

Sustainability

Building construction and operation have an enormous direct and indirect impact on the environment. Buildings not only use resources such as energy and raw materials, they also generate waste and potentially harmful atmospheric emissions. As economy and population continue to expand, designers and builders face a unique challenge to meet demands for new and renovated facilities that are accessible, secure, healthy, and productive while minimizing their impact on the environment.

The main objectives of sustainable design are to avoid resource depletion of energy, water, and raw materials; prevent environmental degradation caused by facilities and infrastructure throughout their life cycle; and create built environments that are livable, comfortable, safe, and productive.

While the definition of what constitutes sustainable *building* design is constantly changing, there are six fundamental principles generally agreed on.

- **Optimize Site Potential**

Creating sustainable buildings starts with proper site selection, including consideration of the reuse or rehabilitation of existing buildings. The location, orientation, and landscaping of a building affect the local ecosystems, transportation methods, and energy use. Siting for physical security has become a critical issue in optimizing site design. The location of access roads, parking, vehicle barriers, and perimeter lighting must be integrated into the design along with sustainable site considerations. Site design for security cannot be an afterthought. Along with site design for sustainability, it must be addressed in the preliminary design phase to achieve a successful project. See WBDG Balancing Security/Safety and Sustainability Objectives.



- **Optimize Energy Use**
With America's supply of fossil fuel dwindling, concerns for energy security increasing, and the impact of greenhouse gases on world climate rising, it is essential to find ways to reduce load, increase efficiency, and utilize renewable energy resources in federal facilities.
- **Protect and Conserve Water**
In many parts of the country, fresh water is an increasingly scarce resource. A sustainable building should reduce, control, or treat site-runoff, use water efficiently, and reuse or recycle water for on-site use when feasible.
- **Use Environmentally Preferable Products**
A sustainable building should be constructed of materials that minimize life-cycle environmental impacts such as global warming, resource depletion, and human toxicity. These environmentally preferable materials are defined by Executive Order 13101 to be "products or services that have a lesser or reduced effect on human health and the environment when compared with competing products or services that serve the same purpose." As such, they contribute to improved worker safety and health, reduced liabilities, reduced disposal costs, and achievement of environmental goals.
- **Enhance Indoor Environmental Quality (IEQ)**
The indoor environmental quality (IEQ) of a building has a significant impact on occupant health, comfort, and productivity. Among other attributes, a sustainable building should maximize daylighting; have appropriate ventilation and moisture control; and avoid the use of materials with high-VOC emissions. Additional consideration must now be given to ventilation and filtration to mitigate chemical, biological, and radiological attack.
- **Optimize Operational and Maintenance Practices**
Incorporate operating and maintenance considerations into the design of a facility will greatly contribute to improved working environments, higher productivity, and reduced energy and resource costs. Designers are encouraged to specify materials and systems that simplify and reduce maintenance requirements; require less water, energy, and toxic chemicals and cleaners to maintain; and are cost-effective and reduce life-cycle costs.

We realize that all of the recommendations listed above may not be applicable to this specific project but please consider these issues as you proceed through project design



Comments of Chairman Connolly for April 17th BRAC EIS public meeting

Lack of commitment to mitigation measures and best management practices

The DEIS provides little commitment to the best management practices and mitigation measures that will be pursued. This concern is not limited to transportation but extends to a number of issues.

L1.1

Transportation is, though, the critical concern, and we would note that the DEIS discusses transportation mitigation measures in terms of efforts that could be pursued rather than efforts that will be pursued. Full funding of the transportation mitigation measures identified in the DEIS prior to occupancy is absolutely critical. An execution plan and timeline for the transportation projects identified should be developed, and funding commitments for transportation mitigation should be demonstrated in the Record of Decision. In addition, the Record of Decision should commit to the development and implementation of a Transportation Demand Management (TDM) plan; this plan should include a strategic plan that details specific actions and trip reductions. The Army should seek funding for a full time position at Fort Belvoir to manage a Transportation Demand Management program.

L1.2

The proximity of EPG and Fort Belvoir to the Franconia-Springfield Metro and VRE station and access to public transportation along the Route 1 corridor could afford opportunities to optimize transit. This DEIS does not commit or address in sufficient detail how the Army would try to optimize the use of transit. This level of development should strive to maximize transit-oriented trips through increased use of bus, rail, and Metro. This could also include a Department of the Army run shuttle service to VRE, Metro station, and retail and commercial establishments in the vicinity of EPG and Main Post.

L1.3

Proposed reclassification of land use categories for the land use plan

The proposal to pursue a comprehensive reclassification of land use categories for the land use plan is being considered outside the context of a more comprehensive Real Property Master Planning process, and the redesignation of land use categories may have potential implications that extend well beyond anything that needs to be considered in support of the BRAC relocations. Of particular note is the proposal to eliminate the "Environmentally Sensitive" land use category, which would appear to have the effect of removing from protection any environmentally sensitive area on the Post that is not afforded regulatory protection. It is also impossible to understand, much less assess the impacts of, the proposed land use redesignations as they relate to potential future development on the Post (e.g., what would be the potential buildout levels of population and employment under the proposed land use designations?) We do not understand why a comprehensive redesignation of land use categories is needed to support the BRAC relocations; we feel that these relocations could be accommodated using the existing land use plan categories, recognizing that these categories would need to be mapped on the Engineer Proving Ground (EPG) site and that some

L1.4

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Continued

changes in the mapping of these categories on the Main Post may also be needed. We recommend that the land use plan changes that are made through this process be limited to the minimum necessary to accommodate the BRAC relocations. These land use plan changes should apply the existing land use categories, and broader changes to the Plan should only be considered through separate master planning and NEPA processes.

L1.4
(Continued)

Scope of the proposed action

The scope of the proposed action, in our view, does not seem to be consistent in all cases with what is needed to accommodate the required BRAC transfers. As noted above, we feel that the proposed revisions to the land use plan exceed what would be needed to accommodate the BRAC actions, and it is our view that any changes to the land use plan that go beyond the minimum changes needed to accommodate BRAC would be best dealt with through a more comprehensive Real Property Master Plan review process (and related review under NEPA).

L1.5

In addition, two of the proposed construction and renovation projects (the modernization of barracks and the provision of a family travel camp) seem to bear little, if any, relationship to the recommendations of the BRAC Commission. Regardless of whether or not these are desirable proposals, we question why these proposals are included for consideration within this DEIS instead of separate NEPA processes. Conversely, two projects that would appear to be closely linked to the BRAC-related growth (a shoppette and a physical fitness center at EPG) are not identified as part of the BRAC action but are instead identified as separate projects in the cumulative effects section of the DEIS. We are also concerned that other support services that would be needed to serve the BRAC-related growth do not appear to have been addressed.

L1.6

Graphical information relating to the options

The information that has been provided regarding the physical layout of facilities and impacts to natural and cultural resources is insufficient to provide a full understanding of the reasons for and implications of these impacts. Information regarding acreages of impacts does not present enough guidance for us to draw clear distinctions among alternatives in terms of natural resource implications. We have asked project consultants for more detailed graphical information and understand that information pertaining to development parcels as they relate to natural resources is forthcoming (and may be provided prior to the April 17 public hearing).

L1.7

Scope of alternatives

Of the four build alternatives presented, we feel that, from a transportation standpoint, the preferred and City Center alternatives would be preferable to the two options that would concentrate development on the Main Post. Limitations on the ability to improve the Fairfax County Parkway in the vicinity of I-95 and

L1.8

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continued

Terminal Road, along with limitations associated with traffic signal spacing along both the same stretch of the Fairfax County Parkway and Richmond Highway, would make any alternative that would concentrate new development on the Main Post problematic. That being said, we do not feel that the scope of the alternatives that has been identified is sufficient. All four of the build alternatives would concentrate development in certain areas. There has been no analysis of an alternative that provides for a more dispersed pattern of development, and all of the alternatives assume that all 9,263 staff and contractors associated with the Washington Headquarters Service relocation must be located in the same place. A hybrid alternative that disperses Washington Headquarters Services (WHS) activities on both the EPG and General Services Administration (GSA) sites but that retains the hospital and other uses on the Main Post should be evaluated. In addition, the EIS should provide guidance as to why the GSA site has not been considered for the location of the hospital, particularly in light of the proximity of this site to the consortia health care university campus.

L1.8
Continued

Finally, the DEIS does not consider the impact of air pollution resulting from congestion. It should consider these impacts.

L1.9

SUPERVISOR HYLAND: Thank you, Don and Brian. It's a pleasure to be here. For 20 years I've had my town meeting in this wonderful facility and you have joined me since you have come to Fort Belvoir and have been a very important participant, in terms of informing citizens of Mount Vernon, particularly now with BRAC, what the impact would be on Mount Vernon.

Chairman Jerry Connolly was to be here this evening. He's in Reston and he -- at 6:30, I received an e-mail saying would you mind bringing my statement to the meeting, and that was about two blocks from the school. I went back, got the attachment, and so what I would like to do is quickly read the Chairman's statement, which is a statement on behalf of Fairfax County, and there are several subjects that the Chairman, if he were here, would have addressed.

The first is the lack of commitment and mitigation measures and best management practices. The DIS provides little commitment to the best management and mitigation measures that will be pursued. This concern is not limited to transportation, but extends to a number of issues.

L2.1
(like L1.1)

Transportation is, though, the critical concern and we would note that the draft EIS discusses transportation mitigation members, in terms of efforts that could be pursued, rather than efforts that will be pursued.

L2.2

Full funding of the transportation mitigation measures identified in the draft EIS, prior to occupancy, is absolutely critical. An execution plan and timeline for transportation projects identified should be developed, and funding commitments for transportation mitigation should be demonstrated in the record of decision.

In addition, the record of decision should commit to the development and implementation of a transportation demand management plan. This plan should include a strategic plan that details specific actions and trip productions, and the Army should seek funding for a full time position for a person to manage the traffic demand management program.

The proximity of EPG and Fort Belvoir to the Franconia Springfield Metro and VRE station and access to public transportation along Route 1 (off mike) could afford opportunities to optimize transit. The draft EIS does not commit or address in sufficient detail how the Army would try to optimize the use of transit. This level of development should strive to maximize transit oriented trips through increased use of bus, rail, and metro. This could also include a Department of Army run shuttle service to VRE, Metro station, and retailing commercial establishments in the vicinity of EPG and main post.

L2.3

The proposal to pursue a comprehensively reclassification of land use categories for the land use plan is being considered outside the context of being a more comprehensive real property master planning process, and the re-designation of land use categories may have potential implications that extend well beyond anything that needs to be considered, in support of the BRAC decisions, our relocations.

L2.4

A particular note is the proposal to eliminate the "environmentally sensitive" land use category, which would appear to have the effect of removing from protection any

environmentally sensitive area on the post that is not afforded regulatory protection. It is also impossible to understand, much less assess the impacts of the proposed land use re-designations as they relate to potential future development on the post, for example, what would be the potential build out levels of population and employment under the proposed land use designations.

L 2.4
continued

We do not understand why a comprehensive re- designation of land use categories is needed to support the BRAC relocation. We feel that these relocations could be accommodated using the existing land use categories, recognizing that these categories would need to be mapped on the engineering approving ground site, and that some changes in the mapping of these categories on the main post may also be needed.

We recommend that the land use plan changes that are made through this process be limited to the minimum necessary to accommodate the BRAC relocations. These land use changes should apply the existing land use categories and broader changes to the plan should only be considered through separate master planning and NEPA processes scope of the proposed action. The scope of the proposed action, in our view, does not seem to be consistent in all cases with what is needed to accommodate the required BRAC transfers.

L 2.5

As noted above, we feel that the proposed revisions to the land use plan exceed what would be needed to accommodate the BRAC actions, and it is our view that any changes to the land use plan, that go beyond the minimum changes to accommodate BRAC, would be best dealt with through a more comprehensive real property master plan review process, and related review under NEPA.

In addition, two of the proposed construction and renovations projects, the modernization of barracks, and the provision of a family travel camp seem to bare little, if any, relationship to the recommendations through the BRAC commission.

L 2.6

Regardless of whether or not these are desirable proposals, we question why these proposals are included for consideration within this draft EIS, instead of separate NEPA processes. Conversely, two projects that would appear to be closely linked to the black related growth, a shop at and a physical fitness center in EPG are not identified as part of the BRAC action, but instead, identified as separate projects in the cumulative effects section of the draft EIS. We're also concerned that other support services that would be needed to serve the BRAC related growth do not appear to have been addressed.

Graphical information relating to the options, this information, the information that has been provided regarding the physical layout of facilities and impacts to natural and cultural resources is insufficient to provide a full understanding of the reasons for and implications of these impacts.

L 2.7

Information regarding acreages of impacts does not present enough guidance for us to draw clear distinctions among alternatives in terms of natural resource implications. We have asked the project consultants for more detailed graphical information and understand that this information may be forth coming.

Scope of the alternatives of the four bill alternatives presented, we feel that from a transportation standpoint, the preferred and city center alternatives would be preferable to the two options that would concentrate development on the main post. Limitations on the ability to improve the Fairfax County Parkway and the vicinity of I095 and Terminal Road, along with the limitations associated with traffic signal spacing, along both the same stretch of the Fairfax County Parkway and Richmond Highway, would make any alternative that would concentrate new development on the main post problematic.

L 2.8

That being said, we do not feel that the scope of the alternatives that has been identified is sufficient. All four of the bill alternatives would concentrate development in certain areas. There has been no analysis of an alternative that provides for a more disperse pattern of development, and all of the alternatives assume that all 9,263 staff and contractors associated with Washington Headquarters Service relocation; must be located in the same place.

A hybrid alternative that disperses the Washington Headquarters Services, activities, and both EPG and the GSA sites, but that retains the hospital and other uses on the main post should be evaluated. In addition, the EIS should provide guidance as to why the GSA site has not been considered for the location of the hospital, particularly in light of the proximity of the site, the Consorsure Health Care University campus.

Finally, the DIS does not consider the impact of air pollution, resulting from congestion, it should consider these impacts, and that is the Chairman's statement.

L 2.9

And very quickly, let me get to mine, and first, Brian, thank you for having us and the opportunity to speak and I will certainly concur with everything that has been said by others as far as your willingness to reach out to our community and to engage the community in solicit input on a subject that in my short 20 years representing the citizens of Mount Vernon, there is nothing that is being proposed here that is going to have a more dramatic impact on the citizens.

Last week just a stone's throw from here down the road, Hollywood filmed scenes from National Treasure 2 near the Mount Vernon Estate, George Washington's beloved home, and I'm here to represent the concerns of the Mount Vernon district and to ensure that we preserve my district's treasure, it's quality of life from the impact of the 22,500 people that the Department of Defense has decided will come here.

Transportation infrastructure obviously is the county's and my major concern. The minimum BRAC related transportation improvements you have listed would cost over 458 million. Fairfax County's estimates required improvements are closer to one billion, a small difference. Currently, only three of these projects have funding which are inadequate due to Fort Belvoir's proposed BRAC expansion.

L 3.1

There is a \$50 million short fall to widen the Fairfax County Parkway through the EPG, and an \$11 million short fall to widen Woodlawn Road replacement to four lanes. However, funding and road construction will not alleviate BRAC transportation problems. The draft EIS discusses transportation mitigation measures as a possibility rather than a reality.

The EIS needs to include an investment and implementation plan for transportation improvements and a strategic traffic demand management plan that outlines trip reductions. Part of this plan should necessarily include mass transit, especially Metro Rail and Virginia Railway, express facilities to the EPG and south posts, and the final EIS should include details on shuttle service from the Lorton and Franconia Springfield VRE stations.

L 3.2

Another way to mitigate the transportation impacts is to move the National GeoSpatial Intelligence Agency and Washington Headquarters Service to the GSA Warehouse site, and I support Supervisor Kaufman's effort to remove the preponderance of BRAC employees over 18,000, within walking distance of Metro and VRE.

L 3.3

This is a cost effective smart growth initiative in line with Fairfax County's goals to reduce vehicular traffic and create pedestrian friendly urban communities near mass transit.

I am concerned, as the Chairman has also indicated, about the reclassification of land use categories in the draft EIS, especially the proposal to eliminate the environmentally sensitive land use category. Running through the center of the EPG is Accotink Creek. The area around Accotink Creek is environmentally sensitive and protected by the Chesapeake Bay Preservation Act and other Fairfax County ordinances.

L 3.4

Removal of this land use category could circumvent regulatory protections and open up land areas for future development. Future backgrounds may send more agencies and commands to Fort Belvoir, and Fairfax County representatives and staff need to understand how development could occur in environmentally sensitive lands like the southwest area.

L 3.4
continued

Schools, BRAC's impact on the school system will not be fully realized (off mike) years after implementation. Over time, as DOD employees transfer to other commands or retire, many new and younger generations of employees will move closer to Fort Belvoir and enroll their children in Fairfax County schools, many of whom will make the Lorton, Laurel Hill area the fastest growing part of Fairfax County their home.

L 3.5

Many schools in this area are already overcrowded, including the south county secondary school which is 500 students over capacity when it opened its doors. Fort Belvoir and a congressional delegation need to help to solve this problem by considering a PPEA to build a south county middle school sooner rather than later.

And finally, a little bit aside from the draft EIS, I want to put in a personal request that we look at the replacement of the DeWitt Hospital in South Post, and that we should coordinate and consider and leverage existing services at the Inova Mount Vernon Hospital, which I believe creates an opportunity to partner government with the private sector, which gives us an opportunity to improve health care services to service members by utilizing Inova's rehabilitation joint replacement and wound healing centers, and possibly to locate obstructive services at Mount Vernon Hospital.

L 3.6

These two facilities, along with the upcoming construction of the Inova Lorton Health clinics, can create a continuum -- a unify continuum of medical provider training and service member care in the Mount Vernon district

and finally I saw General Abramson in the audience, who is our Executive Director of the Army Historical Foundation. The National Museum for the United States Army, I am happy that we are finally, I think finally deciding on a location. I am very happy, personally, that it is not going to be, I think at the engineering approving grounds site, and alone -- my optimum location, and I'm not alone, would have been to the left of Penscate.

L 3.7

I think the location, "proposed location," I put that in quotes, of the museum of Camen Road, I think is a major step forward, and I breathe a sigh of relief that finally and maybe it will happen, and again, I hold my breathe, but I think that at least brings it closer to Mount Vernon, and Woodlawn, and Gunston, and other areas of significant historical -- historically significant Mount Vernon.

Again, I thank you for the chance to speak and as one member of the Fairfax County Board, and I think that I can speak in this respect for all members of the Board, we will do whatever we can to try to accommodate and work with Fort Belvoir and the Army to

make the BRAC decision work and to try our best to accommodate the 22,500 people who we will welcome into our community, but we want to make sure that they can come to and fro conveniently and in a fashion that their quality of life is not adversely effected. Thank you very much.

L4

MR. CARR: Ladies and gentlemen, we will now hear from our Lead District Supervisor, Supervisor Dana Kaufman.

SUPERVISOR KAUFMAN: Well, good evening ladies and gentlemen. As Don said, for at least the next nine months, I am Dana Kaufman. After that, I look forward, very much, to being first and foremost known as Ethan's dad. I would also note that at 8:30, I am the last politician who will be speaking. Can I hear an amen?

I go back with Fort Belvoir north of 25 years, and I have had occasion to know every Garrison commander going back, including to when there were flag commands in place, and of all of those different commanders, they certainly each had their own unique strengths.

But I can tell you as a local politician Brian is the first one to actually get it, in terms of working with the community and having a grasp of what the community needs. Now, we just need to ensure that DOD gives them the stuff to do it. BRAC, as I say, is indeed a challenge for those charged with making it work. I would liken it to trying to put together a puzzle while the pieces change their shape in your hands. I would also says it's a great challenge to those of us, particularly to Gerry Hyland and I, are working to make certain this is a net positive change for the Richmond Highway and for the Springfield home and business owners.

When all is said and done, I do believe that the importance and long term benefit of having the National GeoSpatial Intelligence Agency, call Springfield Home, is probably going to be the best and most lasting legacy of this whole BRAC effort, and what it will bring to the county.

It's a generator of high level jobs, it attracts great contractor support, and it is a command with a proven record of working for and with the surrounding residents. Decades from now, I believe the parallel of Springfield to the MGA will be the same as what we know today as Langley to the CIA and Arlington to the Pentagon. But for all of the focus on the DOD community, I also believe that the biggest hurdles we have yet to clear are simply getting different parts and levels of government to work together to realize two common sense improvements.

First and foremost, the missing leg of the Fairfax County Parkway must be built and must be built now. The project is funded, has been fully funded for a decade. The two mile facilities integral to the ultimate success or failure of the entire BRAC program; it creates a front door for the EPG, while opening up the Richmond Highway corridor to the Springfield area commands, and finally completes what has become Fairfax County's Main Street.

L4.1

continued

Our state and federal partners have, frankly, taken turns being at fault for far too long. The bottom line is that Richmond and the Pentagon must get on with laying the asphalt or we'll all be left stranded.

L4.1
continued

The second intergovernmental challenge is getting DOD and the GSA to lower their bureaucracy defense shields and once and for all do away with the half century old wooden relic known as the GSA Warehouses or the Franconia Depot. However one chooses to define the county's future or chooses to promote smart growth in general, preserving low ceiling warehouses next to a regional transportation center is just plain stupid and a waste of tax payer dollars. The Washington Headquarters Service commands coming from Metro accessible locations can remain Metro accessible if the GSA's leaking monuments to inefficiency are leveled and quality offices erected -- I like that gesture, leveled, do that again, beautiful. I like that - are leveled and quality offices brought in their place.

L4.2

For its parts, the DOD community must find a way to make this work with the GSA and the private sector to expedite it, and the reason I feel so strongly, folks, my first exposure to this end of Fairfax is when I was a management intern with the Federal Supply Service. In the late 70's, I recommended getting rid of that pig, and it's still squealing. I don't ask to work marker put there, Brian. I wanted to get to meet and know personally a bulldozer.

We also need a firm understanding of where Fort Belvoir is ultimately heading. At the purest level, this entire BRAC process is being undertaken completely BRAC- words. I made up that word, BRAC-words, as there is no up to date future plan for the entirety of Belvoir. We're focusing on the immediate, but we have yet to lay out what will happen and adopt it over time.

L4.3

Sooner rather than later, we need a new master plan approved and in place for the sake of both the Army and the county. Now, since I wrote these prepared remarks, I also have received a copy of the letter from the head of Federal Highway Administration to Chairman Connolly, and he talks about the letter from FHWA, addresses the Richmond Highway and Telegraph Road connector through Belvoir.

L4.4

What most of us know is the Woodlawn replacement road, and I quote from the letter, "the availability of funding for the four lane connector road is critical if a four lane facility is to be completed and open to the public in 2010."

Ladies and gentlemen, we are currently \$34 million short of building a four lane. We have the dollars to do it as a two, but we've got to get those remaining dollars or else we'll have a ribbon cutting in 2010, stopping the traffic and we'll come back a couple of days later and that same traffic will still be there. So it needs to be four lanes from the start,

continued

and a section of Telegraph Road from Beulah to Old Telegraph has to be widened at the same time as an integral component.

L4,4
continued

So in closing, thank you, Colonel Lauritson, for all of your work, and I want folks to know that he re-upped to continue to be here, and that deserves a round of applause in and of itself. He has been fully attuned to the community interest, and also, I think at this point, Don Carr is down to his last two lives. So with that gentlemen, thank you very much for giving me a chance to speak.



GERALD E. CONNOLLY
CHAIRMAN

COMMONWEALTH OF VIRGINIA
COUNTY OF FAIRFAX

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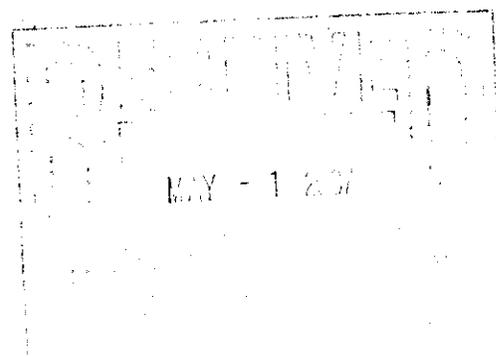
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April 30, 2007

Colonel Brian W. Lauritzen, Commander
U.S. Army Garrison Fort Belvoir
c/o Mr. Patrick McLaughlin
Fort Belvoir Directorate of Public Works
Environmental and Natural Resources Division
Building 1442
9430 Jackson Loop
Fort Belvoir, VA 22060



Dear Colonel Lauritzen:

Through this letter, I am transmitting comments from the Fairfax County Board of Supervisors and our staff regarding the Draft Environmental Impact Statement (DEIS) for Implementation of 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia. These comments were reviewed and endorsed by the Fairfax County Board of Supervisors at its April 30, 2007 meeting.

The proposed action would result in significant modifications to the land use plan of the Long Range Component of Fort Belvoir's Real Property Master Plan as well as base realignment activities that would result in substantial employment increases at Fort Belvoir. The proposed BRAC relocations would have a profound impact on southern Fairfax County; while some of these impacts may be positive ones, we have a number of concerns in a variety of areas about potential adverse impacts and the extent to which these impacts are addressed sufficiently in the DEIS.

The concerns we have about the proposed action and the extent to which the DEIS addresses these concerns are numerous, and we have attached a three-part set of comments. Attachment A identifies key concerns we have in a variety of subject areas. Attachment B identifies additional concerns. Finally, we have identified a number of factual corrections that need to be made and items for which clarification and/or elaboration are needed in the Final Environmental Impact Statement; these are included as Attachment C.

We recognize that the Defense Base Realignment and Closure Commission recommendations are binding and that the Army is obligated to complete the relocations identified for Fort Belvoir by September 15, 2011. We would prefer to see a reduced scope of the proposed action as well as a greater amount of time to: (1) link the BRAC actions more comprehensively to master planning efforts for the post; (2) evaluate how the BRAC relocation mandates can best be accommodated; and (3) ensure that appropriate best management practices and mitigation

LS.1

measures will be funded and programmed so that there is no question that impacts will be mitigated to the extent practicable in advance of employee relocations. The BRAC relocations will be one of the most significant land use actions in the history of Fairfax County, and the time frame that has been imposed on you to implement this action is not sufficient to address in a comprehensive, thorough, collaborative manner the large number of issues that need to be resolved. Please be assured that we recognize this and that the extent and nature of our comments are not intended to denigrate the considerable efforts of Fort Belvoir and its consultants but are instead indicative of the shortcomings of the BRAC process and the complexity of the Army's mandate. We present our concerns, comments, and suggestions with hopes that we can work together during the remainder of the National Environmental Policy Act (NEPA) process and after this process to identify mutually agreeable solutions to the many issues that this action raises. I offer the assistance of County staff to work collaboratively with the Army and its consultants in order to address our concerns.

While we feel that all of our comments merit responses, we wish to highlight the following major concerns:

- A. The DEIS provides little commitment to the best management practices and mitigation measures that will be pursued. As outlined in our detailed comments, this concern is not limited to transportation but extends to a number of issues. **Transportation is, though, the most critical concern, and we would note that the DEIS discusses transportation mitigation measures in terms of efforts that could be pursued and not efforts that will be pursued. Full funding of the transportation mitigation measures identified in the DEIS prior to occupancy is critical. **An execution plan and timeline for the transportation projects identified must be developed, and funding commitments for transportation mitigation must be demonstrated in the Record of Decision.** In addition, the Record of Decision should commit to the development and implementation of a Transportation Demand Management (TDM) plan; this plan should include a strategic plan that details specific actions and trip reductions. The Army should seek funding for a full time position at Fort Belvoir to manage a **Transportation Demand Management program.** The proximity of EPG and Fort Belvoir to the Franconia-Springfield Metro and VRE station and access to public transportation along the Route 1 corridor could afford opportunities to optimize transit. This DEIS does not commit or address in sufficient detail how the Army would try to optimize the use of transit. This level of development should strive to maximize transit oriented trips through increased use of bus, rail, and Metro. This could also include a Department of the Army run shuttle service to VRE, Metro station, and retail and commercial establishments in the vicinity of EPG and Main Post.**

LS.2

LS.3

LS.4

Please note that the first section of the attached comments provides a more comprehensive list of mitigation measures for which we feel that commitments are needed.

- B. The proposal to pursue a comprehensive reclassification of land use categories for the land use plan is being considered outside the context of a more comprehensive Real Property Master Planning process, and the redesignation of land use categories may have potential implications that extend well beyond anything that needs to be considered in support of the BRAC relocations. Of particular note is the proposal to eliminate the "Environmentally Sensitive" land use category, which would appear to have the effect of removing from protection any environmentally sensitive area on the Post that is not afforded regulatory protection. It is also impossible to understand, much less assess the impacts of, the proposed land use redesignations as they relate to potential future development on the Post and the implications of this potential development (e.g., What would be the potential buildout levels of population and employment

LS.5

under the proposed land use designations? What would be the implications to roads, schools, other public facilities and utilities?) We do not understand why a comprehensive redesignation of land use categories is needed to support the BRAC relocations; we feel that these relocations could be accommodated using the existing land use plan categories, recognizing that these categories would need to be mapped on the Engineer Proving Ground (EPG) site and that some changes in the mapping of these categories on the Main Post may also be needed. **Since the update of the Real Property Master Plan for Fort Belvoir will not be completed until 2008 at the earliest, it is imperative that the land use plan changes that are made through this process be limited to the minimum necessary to accommodate the BRAC relocations.** These land use plan changes should apply the existing land use categories, and broader changes to the Real Property Master Plan should only be considered through separate master planning and NEPA processes.

C. The scope of the proposed action, in our view, does not seem to be consistent in all cases with what is needed to accommodate the required BRAC transfers. For example, two of the proposed construction and renovation projects (the modernization of barracks and the provision of a family travel camp) seem to bear little, if any, relationship to the recommendations of the BRAC Commission. Regardless of whether or not these are desirable proposals, we question why these proposals are included for consideration within this EIS instead of separate NEPA processes. Conversely, two projects that would appear to be closely linked to the BRAC-related growth (a shoppette and a physical fitness center at EPG) are not identified as part of the BRAC action but are instead identified as separate projects in the cumulative effects section of the DEIS. As noted in our detailed comments, we are also concerned that other support services that would be needed to serve the BRAC-related growth do not appear to have been addressed as part of this EIS.

LS.6

D. The information that has been provided regarding the physical layout of facilities and impacts to natural and cultural resources is insufficient to provide a full understanding of the reasons for and implications of these impacts. Information regarding acreages of impacts does not present enough guidance for us to draw clear distinctions among alternatives in terms of natural resource implications. We would be interested in reviewing more detailed graphical information pertaining to development envelopes and natural resources than what has been provided in the DEIS.

LS.7

E. Of the four build alternatives presented, we feel that, from a transportation standpoint, the preferred and City Center alternatives would be preferable to the two options that would concentrate development on the Main Post. Limitations on the ability to improve the Fairfax County Parkway in the vicinity of I-95 and Terminal Road, along with limitations associated with traffic signal spacing along both the same stretch of the Fairfax County Parkway and Richmond Highway, would make any alternative that would concentrate new development on the Main Post problematic. That being said, we do not feel that the scope of the alternatives that has been identified is sufficient. All four of the build alternatives would concentrate development in certain areas. There has been no analysis of an alternative that provides for a more dispersed pattern of development, and all of the alternatives assume that all 9,263 staff and contractors associated with the Washington Headquarters Service relocation must be located in the same place. **A hybrid alternative that disperses Washington Headquarters Services (WHS) activities on both the EPG and General Services Administration (GSA) sites but that retains the hospital and other uses on the Main Post is our preferred alternative—we wish to stress the importance of this approach to accommodating the BRAC relocations and feel that the Army should strive to incorporate the GSA site into its preferred**

LS.8

alternative. At a minimum, this approach should be evaluated in the EIS. In addition, the EIS should provide guidance as to why the GSA site has not been considered for the location of the hospital, particularly in light of the proximity of this site to the consortia health care university campus, and the potential opportunities that INOVA Mount Vernon Hospital may provide in supporting the post and the relocation of medical care functions from the Walter Reed Medical Center.

- F. The DEIS suggests that regional vehicle miles traveled (VMT) will be reduced due to a net reduction of 1,700 employees from the region as a result of the BRAC actions, and that this reduction in VMT will, in turn, result in an air quality benefit (in terms of motor vehicle emissions). We take issue with this conclusion and feel that it is unsubstantiated. Even if VMT was to decrease as a result of BRAC (a conclusion that we do not support), VMT is not the sole determinant of air pollutant emissions from motor vehicles; traffic congestion plays a key role as well. The EIS does not take into consideration and include an analysis of the increased production of O₃ (ozone/smog) or PM_{2.5} (fine particulate matter/soot) that will likely result from the significant increase in local traffic on already congested roadways and in congested intersections (in addition to emissions from construction equipment and any new air pollutant sources relating to the BRAC actions). Such an analysis is critical for any final conformity determination to ensure that the BRAC action does not degrade air quality; the region's air quality currently is in nonattainment of O₃ and PM_{2.5} standards. In addition, an O₃ and PM_{2.5} hot spot analysis may be required and should be included as part of the EIS to determine what impacts, if any, each alternative would have on local O₃ and PM_{2.5} concentrations. The analysis should consider various levels of implementation of transportation mitigation measures.

LS.9

The EIS should clarify whether additional emissions from mobile sources (emissions from motor vehicle trips associated with the new employees as well as emissions from construction activity) are accounted for under the General Conformity Rule. The proposed alternative BRAC actions should also be included in the 8-hour O₃ and PM_{2.5} State Air Quality Implementation Plans (SIP) that are currently under development.

- G. The DEIS does not adequately examine impacts to existing public park and recreation levels of service; local-serving public parks in the Mount Vernon and Lee Districts are already deficient in their ability to provide athletic facilities, playgrounds and courts, and this shortfall will be aggravated by the BRAC relocations. The 2003 Defense Authorization Act committed to the dedication of a 135-acre portion of the western EPG area to the Fairfax County Park Authority. The proposed concentration of new development at the EPG site heightens the need for this dedication, as recreational facilities on this site would provide benefits to both the federal employees who would be relocated to the area and the public at large.

LS.10

- H. The DEIS identifies a projected increase of 4,340 children in Fairfax County as a result of BRAC, with an increase in school age children of 3,258. The Fairfax County Public School system has identified an impact of \$77.1 million to address the anticipated facility costs to accommodate the additional enrollment beyond what the school system already has the capacity to address (see an April 27, 2007 letter from Jack D. Dale, Superintendent of Schools, and details within Section H of Attachment A within these comments). This is a significant impact that needs to be addressed. Funding is needed to offset the cost of additional school facilities that would be required as a result of the BRAC relocations.

LS.11

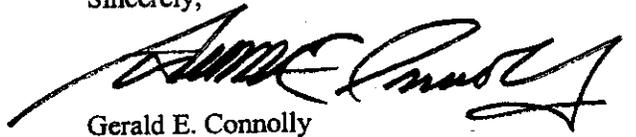
- I. We thank Fort Belvoir for its sensitivity to biological resources in its planning efforts to date and note the discussions within the DEIS of wildlife and wetland refuges, the Forest and Wildlife corridor, and rare, threatened and endangered species. We commend Fort Belvoir for sensitivity to the discovery of the small whorled pogonia on the EPG property and for efforts to protect this species. However, the DEIS identifies a loss of tree canopy that has the potential to significantly impact overall tree canopy levels in Fairfax County and to disrupt the delivery of ecological, environmental and socio-economic benefits that the tree cover is delivering to the community at large, and it is not clear from the DEIS what Fort Belvoir's policy is regarding restoration of this resource and how this policy will be applied to the BRAC actions. The tree canopy that would be removed to accommodate new development (even where in an early/mid successional stage) should be restored via reforestation and landscape tree planting, and a commitment should be made to the preparation and implementation of a tree restoration plan. Fort Belvoir has long had a tree replacement policy (we understand that replacements have been pursued at a 3:1 ratio) and we feel that there is a need for the EIS to confirm and perhaps strengthen this policy as it is applied to the BRAC actions, particularly in light of air quality concerns noted above. Tree replacement efforts should be pursued for all clearing, even of trees that are less than four inches in diameter at breast height.

LS.12

Again, a more comprehensive set of comments is attached. I recommend coordination between the project consultants and county staff on resolution of our issues. Our points of contact are Fred Selden and Noel Kaplan with the Department of Planning and Zoning (703-324-1380) and Mark Canale with the Department of Transportation (703-324-1100).

Thank you for your attention and for your consideration of our comments.

Sincerely,



Gerald E. Connolly
Chairman, Fairfax County Board of Supervisors

GEC/NHK

Attachments: As Stated

- cc: Members, Fairfax County Board of Supervisors
The Honorable John Warner, United States Senate
The Honorable Jim Webb, United States Senate
The Honorable James P. Moran, United States House of Representatives
The Honorable Frank R. Wolf, United States House of Representatives
The Honorable Thomas M. Davis III, United States House of Representatives
The Honorable Timothy M. Kaine, Governor of Virginia
Members, Fairfax County Delegation to the Virginia General Assembly
The Honorable Pierce R. Homer, Secretary of Transportation
Fairfax County Planning Commission
Fairfax County School Board
Fairfax County Park Authority Board
Fairfax County Environmental Quality Advisory Council

Colonel Brian W. Lauritzen

April 30, 2007

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Fairfax County Transportation Advisory Commission

Anthony H. Griffin, County Executive

Robert A. Stalzer, Deputy County Executive

Susan Mittereder, Legislative Director

Katharine D. Ichter, Director, Department of Transportation

James P. Zook, Director, Department of Planning and Zoning

Jimmie D. Jenkins, Director, Department of Public Works and Environmental Services

Gloria Addo-Ayensu, Director, Department of Health

Timothy K. White, Acting Director, Fairfax County Park Authority

Paula C. Sampson, Director, Department of Housing and Community Development

Jack D. Dale, Superintendent, Fairfax County Public Schools

Fairfax County Chamber of Commerce

Mount Vernon-Lee Chamber of Commerce

Greater Springfield Chamber of Commerce

Southeast Fairfax Development Corporation

Central Springfield Area Revitalization Council

**Draft Environmental Impact Statement (DEIS) for Implementation of 2005 Base
Realignment and Closure (BRAC) Recommendations and Related Army Actions
at Fort Belvoir, Virginia
Comments from Fairfax County, Virginia**

Major Issues

This attachment presents a compilation of comments identifying major issues as identified through a multi-agency review of the Draft Environmental Impact Statement. The following agencies participated in this review:

County Executive's Office (Fairfax County Environmental Coordinator)
Fairfax County Department of Housing and Community Development
Fairfax County Department of Planning and Zoning
Fairfax County Department of Public Works and Environmental Services
Fairfax County Department of Transportation
Fairfax County Health Department
Fairfax County Fire and Rescue Department
Fairfax County Park Authority
Fairfax County Police Department
Fairfax County Public Schools
Fairfax Water

In addition, the National Park Service provided comments that have been incorporated.

Draft Environmental Impact Statement (DEIS) for Implementation of 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia
Comments from Fairfax County, Virginia—Major Issues

A. COMMITMENTS TO BEST MANAGEMENT PRACTICES AND MITIGATION MEASURES

The DEIS presents a series of best management practices and/or mitigation measures for many of the theme areas but often does not present these ideas as firm commitments; rather, many of these ideas are presented as “potential” actions or actions that “can be considered” to reduce impacts. The EIS should clearly identify commitments that will be made to minimize and mitigate for adverse impacts. We are particularly concerned about the lack of clarity regarding transportation mitigation measures that will be pursued (the DEIS identifies these projects but does not identify who will be responsible for implementation), but firm commitments are needed in a variety of other areas as well. We recommend that commitments be made in a variety of areas as follows:

L5.13

Transportation--General

- Full funding of the transportation mitigation measures identified in the DEIS prior to occupancy. This should include a strategy, plan, schedule, and financial commitments for implementation of the transportation mitigations measures.
 - Transportation improvements should be provided and appropriately phased in order to correct transportation deficiencies associated with current development at Fort Belvoir and to achieve an acceptable level of service on the transportation network in support of existing and new development.
 - At a minimum, the Army should fund and construct the improvements listed under section 4.3.3.2 (page 4-63)--Fort Belvoir Main Post Roadway Network. Under this section a new access control point to serve North Post is mentioned on Route 1. This new control point and access to Fort Belvoir (to both South and North Post) should be provided with a grade separated interchange.
 - As more detailed operational analysis studies are conducted, additional transportation mitigation measures may be needed. These additional improvements developed with more detailed analysis should be included in the overall transportation mitigation plan.
 - The Army should develop a plan for undertaking Environmental Assessments or Environmental Impact Statements for transportation mitigation projects.
 - Of particular note, the section of the Fairfax County Parkway through the Engineer Proving Ground (EPG) should be constructed to its ultimate section (six lanes) as shown on the Comprehensive Plan.

L5.14

Transportation--Roads

- Development of a connection between I-95 northbound general purpose lanes to the westbound Fairfax County Parkway. The DEIS (page 4-85) indicates a mitigation measure to reconstruct the I-95/Fairfax County Interchange. This measure only

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addresses improved access for the HOV movement. (It should also be noted that this interchange will also need to accommodate the HOT lane project.)

- Funding and construction of an additional grade-separated connection between the North and South Post areas over Richmond Highway to improve traffic flow and reduce backups at the existing entrance gates.
- Installation of Uninterruptible Power Supplies (UPS) to select traffic signals in the area as described in section L of this attachment.

L5.16

Transportation--Transit

- Optimization of transit-oriented trips through measures such as:
 - Provision of shuttle service from the Franconia-Springfield Metrorail station and the Lorton VRE station to EPG and the Main Post.
 - Provision of shuttle service to retail/commercial areas that are proximate to the EPG site and the Main Post.
 - Provision of an on-base circulator.
 - Provision of shuttle service to the Hospital and/or Pentagon.
 - Provision of pedestrian connections to connect EPG and Main Post with facilities (for example bus shelters) that would encourage transit use.
- Provision of increased transit service to the EPG from the I-95 corridor via the planned HOT lanes.

L5.17

Nonmotorized Transportation

- Provision of trails consistent with the county's adopted Trails Plan, including the construction of a stream valley trail along Accotink Creek.
- Provision of trails to link the EPG site to the Cross County Trail
- Development of a non-motorized transportation plan to mitigate the adverse impacts on the transportation infrastructure.
- Completion, between Mount Vernon and the Occoquan National Wildlife Refuge, of a pedestrian, bicycling and water trail network as segments of the Potomac Heritage National Scenic Trail.
- Provision of pedestrian and bicycle connections between on-post and/or near-post housing and on-site employment areas.
- Design of new buildings to accommodate bicycle commuting (e.g., secure parking facilities, locker and shower facilities).
- Identification of mechanisms through which new trails will be funded and constructed.

L5.18

Transportation Demand Management

- Development and implementation of an effective Transportation Demand Management (TDM) program. Goals should be established for specific percentage reductions in single-occupant vehicle usage. Ridesharing, carpooling, van pooling, bus, VRE, Metro, establishment of park and ride/transit facilities, and limiting available parking are just some of the methods that can be incorporated into an effective TDM program. To ensure the

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success of this program and maintain a firm commitment for implementation, Fort Belvoir should seek a full time position to manage a comprehensive and aggressive TDM program.

Emergency Services

L5.19

- Establishment of a coordination process with Fairfax County emergency services personnel through which population increases in the Fort Belvoir area will be monitored over time so that necessary adaptations can be made to ensure that emergency service delivery will be maintained within appropriate coverage and response times.

Schools

L5.20

- Funding to offset the cost of the additional school facilities required as a result of the BRAC relocations. Specifically, to address the total impact of 3,258 school aged children (if all of these children attend public schools) will require the equivalent of 1.95 elementary schools (900 capacity), 0.4 new middle school (1,250 capacity) and 0.4 new high school (2,500 capacity) for a projected facilities cost of \$131.25 million. Adjusting this need against the existing capacity available in the area eliminates the high school need and reduces the middle school need to 0.32 new middle school buildings. The adjusted cost for additional middle and elementary school facilities after using all available capacity is \$77.1 million.

Land Use

L5.21

- The retention of a vegetated buffer at least 100 feet in width along the northern boundary of EPG, to be supplemented with additional landscaping as needed, is important to provide an effective transition to the low density residential areas to the north of the EPG site.

Biological Resources

L5.22

- Protection of all environmentally sensitive areas on the Main Post and EPG site, including minimization of encroachments into Environmental Quality Corridors (EQCs)—this would include a commitment to designing road and utility crossings of EQCs in a manner that will minimize disturbance associated with these crossings.
- Dedication of the Accotink Creek EQC to the Fairfax County Park Authority.
- Minimization of clearing of trees through sensitive design and construction efforts
- Reforestation and landscape tree planting efforts that will be sufficient to restore the tree canopy that will be removed (including early successional areas) to support the proposed development and associated infrastructure. Ideally, a tree canopy restoration plan would be developed that displays graphically the areas within which tree canopy would be restored. Clear references to tree replacement commitments should be made—Fort Belvoir's tree replacement policy should be confirmed and perhaps strengthened as it is applied to the BRAC actions.
- Wetland mitigation efforts that will occur as close to the source of impacts as possible and, if possible, within the same watersheds as the impacts.

Water Resources

L5.23

- Stormwater management measures that will, at a minimum, be consistent with county requirements regarding stormwater management, Chesapeake Bay Preservation Areas, Floodplain Regulations, Erosion and Sediment Control requirements and adequate outfall. Floodplain elevations should not be raised as a result of the proposed development. If stormwater management concepts are not presented in the Final EIS, a commitment is needed to ensure that stormwater management facilities will not create significant additional environmental impacts beyond what is described in the DEIS (particularly in terms of vegetative communities, RPAs, EQCs and wetlands). We request Fort Belvoir to share stormwater management plans with the county once these plans are developed and to pursue best management practices that exceed state and local requirements as identified on page 4-233 of the DEIS.
- Mitigation of RPA impacts through the establishment of vegetated buffer areas elsewhere on the post (or on nearby sites if there is insufficient restoration capacity on-post) at least equal to the areas of encroachment.

Cultural Resources

L5.24

- Provision of an archaeological survey of the GSA site.
- Development, as required by Section 106 of the National Historic Preservation Act, of a Programmatic Agreement with consulting parties to include representatives of all identified cultural resources and by-right consulting parties (e.g. Fairfax County Park Authority and Fairfax County Government staff).
- Interpretation of any cultural resources including brochures, signage, exhibits, Web sites, etc.

Parks and Recreation

L5.25

- Dedication of the 135-acre portion of the western EPG area to the Fairfax County Park Authority consistent with the 2003 Defense Authorization Act. In light of the fact that the DEIS does not identify this as an area needed to support the BRAC actions, this prior federal commitment to Fairfax County should be honored.
- Construction of recreational facilities on the western EPG area to help offset demand created by the new development associated with the BRAC action.

Air Quality

L5.26

- Provision of necessary analyses to demonstrate conformance with general conformity air quality requirements (we do not feel that this has been done yet).
- Identification of air quality control measures that will be funded and implemented (these can be the transportation mitigation measures noted earlier).
- Monitoring of intersections before and after implementation of BRAC actions to identify potential hot spots for ozone and PM_{2.5} related to the BRAC actions, and identification of contingency measures that can be taken if impacts of air quality concern are identified as a result of the monitoring.

Hazardous Materials

- Development of Health and Safety Plans for each site affected by contamination in order to confirm that each site will have had the appropriate remediation before any new land uses and any construction activities that may result in exposures to hazardous materials.
- Provision of copies of Health and Safety Plans to county staff for review and approval and provision to county staff of certification at the conclusion of any site remediation with a Health and Safety Plan.

L5.27

B. REDESIGNATION OF LAND USE CATEGORIES

The proposal to pursue a comprehensive reclassification of land use categories for the land use plan is being considered outside the context of a more comprehensive Real Property Master Planning process, which, according to the DEIS, will not be completed until 2008. It is unclear to us how the land use plan will actually be amended--would the issuance of a Record of Decision constitute an official plan change or would there be a separate process pursued? The redesignation of land use categories may have potential implications that extend well beyond anything that needs to be considered in support of the BRAC relocations, and it is not possible to understand these implications without better definition (e.g., the "community" category would include a wide range of uses) and guidance pertaining to densities/intensities and design/form.

L5.28

Page 4-18 of the DEIS expresses concern about compatibility issues associated with the existing Plan designations, but it is not clear to us that the proposed BRAC uses could not be compatible with the current designations, recognizing that these categories would need to be mapped on the Engineer Proving Ground (EPG) site and that some changes in the mapping of these categories on the Main Post may also be needed. The proposed land use category redesignations raise a number of questions that would be best addressed through a comprehensive RPMP process—we are not necessarily opposed to a streamlined set of land use designations but feel that a more comprehensive master planning process is the appropriate mechanism through which such an action should be considered; we therefore recommend that RPMP changes be limited at this time to those that must be made to accommodate the BRAC relocations and that these changes occur within the context of the existing land use designations.

L5.29

Our specific concerns relating to the proposed redesignation of land use categories are as follows:

1. The proposed action would subsume the existing "Environmentally Sensitive" land use category into other land use categories, particularly the "Community" category. Page 2-7 of the DEIS states that "environmentally constrained land areas would continue to have all regulatory protections in place," and similar statements are made elsewhere in the

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DEIS, yet significant areas that have been identified as having environmental constraints are not afforded regulatory protection.

There are significant areas of environmental sensitivity outside of the designated (and protected) "Special Natural Areas" on the post (the Accotink Bay Wildlife Refuge, the Jackson Miles Abbott Wetland Refuge, and the Forest and Wildlife Corridor), and significant portions of these areas would not be protected through Resource Protection Area designation. A table within the text of the 1993 Real Property Master Plan clearly indicated that no development was intended for any area designated as "Environmentally Sensitive," and the removal of this designation creates concern about the potential for encroachment into these areas. The following statement, taken from page 4-267 of the DEIS, highlights this concern:

"While changes in land use designation alone would not have consequences for vegetation, areas previously designated as Environmentally Sensitive or Outdoor Recreation could potentially be used for purposes incompatible with natural resources management goals under the new land use designations."

Similar statements are made elsewhere in Section 4 of the DEIS.

The EIS should better identify the relationship between environmentally sensitive areas and the extent to which these areas would truly be protected by regulation. We recommend the retention of the "Environmentally Sensitive" designation and the application of this category to environmentally sensitive areas of the EPG site. Ideally, this designation would be expanded on the Main Post to incorporate additional areas (e.g., much of the southwest post area). Absent the restoration of this designation, Plan text is needed that would clearly establish an expectation for protection of all environmentally sensitive areas on the post. Significant restrictions should be placed on land disturbing activities and active uses (e.g., recreation, military training) within environmentally sensitive areas, and such areas should be managed for the long-term protection of the natural communities and ecosystems and protection/recovery of species or communities of concern (e.g., small whorled pogonia).

(L5.31)

2. It is not clear exactly what within the Real Property Master Plan would be revised and what would remain, as specific amendments to the text of the RPMP are not specified within the DEIS. What would appear to remain would be a land use plan map that is inconsistent with the land use categories that are discussed and defined in the text of the Real Property Master Plan. How will the redesignation of land use categories relate to a table in the text of the 1993 plan that identifies land use acreage, developable acreage, potential number of people, and building square footage for each land use category within

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each planning district (recognizing that revisions were made in 2002 to the Regional Community Support Center Subarea of the North Post)?

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3. We also do not understand, and therefore cannot assess the impacts of, the proposed land use redesignations as they relate to potential future development on the post. The redesignation would seem to allow for significantly more residential and nonresidential development, and a number of statements in the DEIS seem to confirm this concern. Further, the “community” designation is vague and it is unclear what the implications of this designation would be (for example, within the preferred alternative, the Woodlawn Village residential area would be redesignated for a community use. What is the specific use anticipated for this area?) What would be the potential buildout levels of population and employment under the proposed land use designations, and what would be the implications of these potential development levels compared with what could occur under the existing RPMP (e.g., what would be the implications to roads, schools, other public facilities and utilities?) What are the permitted uses allowed under the new land use designations?

L5.32

4. We have a particular concern regarding the proposal to designate the entirety of the EPG site as “Professional/Institutional.” The DEIS does not identify the proposed uses for much of the EPG site, and we therefore have no information with which to assess the implications of this land use designation. What uses are anticipated in the western half of the EPG site?

L5.33

We also note that significant areas of the EPG site are environmentally sensitive, and the incorporation of these areas within the “Professional/Institutional” category would appear to provide these areas with even less protection than would be the case under the “Community” designation. Ideally, the “Environmentally Sensitive” designation would be retained and all environmentally sensitive areas on the EPG site would be identified as such on the plan map. Fairfax County has mapped what we believe is the Accotink Creek Environmental Quality Corridor (EQC) on the EPG and we have provided this information to the Army’s planning team.

Additionally, the 2003 Defense Authorization included dedication of a 135-acre portion of the western EPG area to the Fairfax County Park Authority, and the proposed land use designations are inconsistent with this action. Page 4-18 of the DEIS states:

“Designation of the northwest corner of EPG as Professional/Institutional would mean that the Army intends to retain this parcel in lieu of transferring it to Fairfax County.” However, the DEIS does not identify this area as a site needed to accommodate BRAC relocations. Therefore, this provision of the 2003 Defense Authorization should be implemented and the 135-acre area of the EPG should be designated as a future dedication to the Fairfax County Park Authority. Dedication of this area for recreational purposes would provide needed recreational opportunities for the federal employees who would be relocated to the area as well as for the public at large.

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The county's Comprehensive Plan recommends dedication of the entire Accotink Creek Environmental Quality Corridor and other environmentally sensitive lands to the Fairfax County Park Authority. The county's Trails Plan also identifies trail facilities on the EPG property, most notably a stream valley trail along Accotink Creek. The proposed land use plan designation for the EPG site would be inconsistent with this guidance, and the DEIS is silent regarding dedication of the EQC to the Park Authority and regarding construction of a publicly-accessible stream valley trail along Accotink Creek. We are concerned that the proposed land use designation would set the stage for access restrictions to the entirety of the EPG site, including the Environmental Quality Corridor. Such restrictions would create a large gap in access in what is planned to be a continuous stream valley park within the Accotink Creek stream valley. The EIS should commit to dedication of the EQC to FCPA, the construction of a trail consistent with the Trails Plan, and, if possible in light of security considerations, trail connections between the stream valley trail and the EPG employment areas.

L5.35

5. Clarification is needed regarding the "Troop" area designation as it relates to the "Residential" designation and the relationship between the proposed land use map changes and the proposed barracks modernization project on the North Post. The previous land use plan categories drew a distinction between "Family Housing" and "Troop Housing" but the current categories appear to be more ambiguous even though the intent behind the separation of housing areas into these two categories seems to remain the same. The proposed land use plan map would imply that the "Troop" use is not a residential use. Are we correct in assuming that the intent is to provide for troop housing in the "Troop" area? Also, one of the proposed projects (#19) would be the modernization of the barracks in the McRee Barracks Complex, located on North Post -- this area will be designated for Professional/Institutional use -- will troops still live there? If so, why is this area not being planned for a Troop or Residential use?

L5.36

C. SCOPE OF THE PROPOSED ACTION

The scope of the proposed action, in our view, does not seem to be consistent in all cases with what is needed to accommodate the required BRAC transfers. As noted above, we do not feel that the proposed land use plan category changes are needed to support the BRAC relocations and question why this particular NEPA action is the vehicle through which these category changes are being considered.

In addition, two of the proposed construction and renovation projects (the modernization of barracks and the provision of a family travel camp) seem to bear little, if any, relationship to the recommendations of the BRAC Commission. We further note that the proposed modernization of barracks on the North Post would seem to be at odds with the proposal to designate this area for "Professional/ Institutional" uses and the proposal to move the area identified for "Troop" uses to the South Post. We also note that potentially significant impacts to biological resources are identified for the proposed family travel camp use on the South Post (see pages 4-270 and 4-271). Regardless of whether or not these are

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desirable proposals, we question why these proposals are included for consideration within this DEIS instead of separate NEPA processes. Conversely, two projects that would appear to be closely linked to the BRAC-related growth (a shoppette and a physical fitness center at EPG) are not identified as part of the BRAC action but are instead identified as separate projects in the cumulative effects section of the DEIS. As noted later in these comments, we are also concerned that other support services that would be needed to serve the BRAC-related growth do not appear to have been addressed.

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D. NEED FOR BETTER GRAPHICAL REPRESENTATIONS OF EXISTING CONDITIONS, THE PROPOSAL AND ALTERNATIVES

The Draft Environmental Impact Statement only provides general descriptions concerning the areas that will be cleared to facilitate the proposed development and associated infrastructure and does not provide graphical depictions of proposed facilities, roads, utilities, transit facilities, parking areas, stormwater management facilities and associated limits of clearing and grading. While it is our understanding from conversations with the NEPA Support Team that detailed design information is not yet available, overall potential development envelopes, or parcels, have been identified. It would be helpful to have, for each alternative, relatively large scale information regarding the locations of these parcels as they relate to locations of vegetative communities (particularly forest and woodland communities), areas of planted tree cover, RPAs, EQCs, existing impervious cover, sensitive wildlife habitats, wetlands, and other environmental parameters. It is difficult to gauge the need for or significance of the impacts to vegetative communities and other environmental resources (or impacts to the residential areas north of the EPG site) absent this information. For example, the DEIS clearly indicates that the Satellite Campuses alternative would have more than twice the acreage of RPA effects than the other alternatives, but it does not provide any information that would indicate how much of the RPA impact for this alternative would occur within areas that have already been developed. This distinction makes a difference, but the information that is provided in the DEIS does not discuss or display the nature of the RPA impacts. The DEIS should separately identify environmentally sensitive areas that have already been altered by previous development and those that may be altered during construction.

L5.38

E. SCOPE OF ALTERNATIVES

We do not feel that the scope of alternatives identified is sufficient. At the time of preparation of the county's scoping comments (July 2006), we understood that one of the alternatives being considered for analysis would have dispersed development on the Main Post (including Davison Army Airfield), the EPG site, and the GSA site. However, all four of the build alternatives that were incorporated within the DEIS would concentrate development in certain areas, and the alternative that comes closest to a "dispersal" option (the Satellite Campuses alternative) would not place any of the development at either the EPG or GSA sites. There has, therefore, been no analysis of an alternative that provides for a more dispersed pattern of

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development, and all of the alternatives assume that all 9,263 staff and contractors associated with the Washington Headquarters Service relocation must be located in the same place. We recognize that there are significant transportation problems that would be created through an increased emphasis on development at the Main Post, even if development was to be dispersed on the Main Post. We therefore recommend a dispersed development approach that would more evenly divide development among the three areas being considered (the EPG site, the GSA site, and the Main Post) as opposed to the Satellite Campuses alternative. A new, hybrid alternative that disperses Washington Headquarters Services (WHS) activities on both the EPG and GSA sites but that retains the hospital on the Main Post and the National Geospatial-Intelligence Agency (NGA) relocation on the EPG site is our preferred alternative and should, at a minimum, be evaluated in the EIS.

The EIS should provide guidance as to why the GSA site has not been considered for the location of the hospital, particularly in light of the proximity of this site to the consortia health care university campus. In addition, the EIS should address opportunities that INOVA Mount Vernon Hospital may provide in supporting the post and the relocation of medical care functions from the Walter Reed Medical Center.

The GSA site affords opportunities in the Springfield area to accommodate some of the BRAC growth. A detailed analysis should be conducted to determine the feasibility of using this location, to include a study of site access and a Metro station connection. The analysis should include a determination of the level of development that this site could reasonably accommodate. Again, it would be our preference to disperse development in a manner that takes advantage of the opportunities that the GSA site provides.

We also recommend that a related hybrid alternative be considered if the proposed transportation mitigation measures cannot be fully implemented. This hybrid alternative should consider dispersal of BRAC actions to the North Post, the South Post, Davison Army Airfield, EPG, and the GSA site. Additional transportation analysis would be needed for consideration of such an alternative.

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F. AIR QUALITY

As noted on page 4-139 of the DEIS, Fairfax County is located within a nonattainment area for the federal 8-hour ozone (O₃) and fine particulate (PM_{2.5}) standards. We are concerned that increases in local traffic, traffic congestion, construction activities and new area sources that will be associated with the BRAC actions (particularly if the full extent of identified transportation mitigation measures is not pursued) could result in increased ozone and fine particulate concentration levels within the southeastern portion of the county and feel that the DEIS does not address this concern adequately.

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Page 4-140 of the DEIS notes that the proposed BRAC action is a nontransportation project within a nonattainment area. The DEIS states: "Therefore, a general conformity analysis is

required with respect to the 8-hour O₃ and PM_{2.5} NAAQS [National Ambient Air Quality Standards]. Under the general conformity rule, a project conforms if such activities DO NOT

- Cause or contribute to any new violations of an NAAQS in an area
- Increase the frequency or severity of any existing violation of any NAAQS in an area
- Delay timely attainment of any NAAQS or any required interim emission reductions or other milestones in an area.”

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It is our contention that the EIS should address all of the above considerations with specific analyses in order to make a final conformity determination.

At a minimum, the EIS should take into consideration and include an analysis of the increased production of O₃ and fine particulate matter (PM_{2.5}) that will likely result from the significant increase in concentrated traffic on already congested roadways and intersections in the area. The analysis should account for increased congestion and its associated impact on speeds and associated emissions for the speeds and roadway/intersection types for peak conditions during peak travel times.

If the above analysis shows an impact (air quality concern due to congested roadways and intersections involving significant traffic), then an O₃ and PM_{2.5} hot spot analysis (qualitative or otherwise) should be included as part of the EIS to determine what impacts, if any, each alternative would have on local O₃ and PM_{2.5} concentrations. The analysis should:

- Be undertaken for all intersections identified in the DEIS that can be expected to have an average level of service of D or worse.
- Consider the entire period of the regional transportation plan, the forthcoming O₃ and future PM_{2.5} State Air Quality Implementation Plans (SIPs).
- Provide for various levels of implementation of transportation control measures.

A commitment to implement the control measures or alternatives should be provided as part of the conformity determination if impacts of air quality concern are found.

Monitoring of intersections for ozone and PM_{2.5} should be pursued both before and after implementation of BRAC actions to determine if the BRAC actions will result in impacts of air quality concern. If such impacts are identified, contingency measures should be taken to mitigate these impacts. Feasible contingency measures should, ideally, be identified in the Record of Decision.

Page 4-143 of the DEIS notes that meso-scale air quality analyses would be needed to address fine particulate and ozone impacts of the various alternatives and notes that such regional analyses are typically conducted by metropolitan planning organizations using regional airshed models. The DEIS states: “Meso-scale analysis is generally not conducted on a project-specific basis and is not necessary for this EIS.”

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It is our contention that the above statement can only be applied assuming that the BRAC action meets the criteria as stated above regarding conformity determination using the latest

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available model for estimating criteria pollutants. Therefore, a conformity determination should first be conducted as outlined above. In addition, it is our position that the BRAC action represents a regionally significant project that may impact the mobile emissions budget in the draft 8-hour O₃ State Air Quality Implementation Plan (SIP) and, therefore, the on-road inventory related to this action should be included in the SIP.

L5.43

Page 4-154 of the DEIS indicates that regional vehicle miles traveled (VMT) will be reduced due to a net reduction of 1,700 employees from the region as a result of the BRAC actions (the net increase in employment at Fort Belvoir will result entirely from transfers within the Washington, DC region, and approximately 1,700 existing jobs at Fort Belvoir will be transferred out of the region). Because of the overall VMT reduction, the document concludes that there will be an air quality benefit (in terms of motor vehicle emissions). As noted in our "Transportation" comments, we take issue with this conclusion. We also note that factors affecting emissions of ozone precursors from motor vehicles are not limited to VMT. Might a highly congested, lower VMT condition produce higher pollutant emissions than a less congested scenario with higher VMT? This again points to the need for an estimation of localized O₃ and PM_{2.5} concentrations and a comparison of the concentrations to the applicable air quality standard.

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Mobile source emissions of ozone precursors should ideally be compared among alternatives (considering various levels of implementation of transportation mitigation measures) through testing of each alternative using a regional mobile source emissions model along with transportation modeling information associated with each alternative. It is our view that the DEIS assumption regarding VMT reduction based on approximately 1,700 existing jobs at Fort Belvoir being transferred out of the region is unsubstantiated and can only be confirmed through an analysis of the mobile emissions estimates comparing the alternatives in the DEIS to a no-build scenario.

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The EIS should also look at hazardous air pollutants or air toxics in its analysis. There will be many diesel engines running long hours over multiple years in the construction equipment and this has the potential to create air toxics and carcinogens. Estimated emissions should be developed and it should be determined if monitoring of air toxics should be included as a mitigation measure.

L5.46

Page 4-153 of the DEIS notes that the estimated greatest annual project-related emission values for Nitrogen Oxides (NO_x) and Volatile Organic Compounds (VOCs) exceed the respective general conformity thresholds established by EPA. Therefore, general conformity requirements apply to these precursors of ozone.

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G. PARKS AND RECREATION

The Socioeconomics section of the DEIS does not adequately examine the impacts to existing public park and recreation levels of service. This section seems to assume that all

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recreation needs are provided on base which is not the case. Military families are also users of parks and recreation facilities provided by public agencies. Local-serving public parks in Mount Vernon and Lee Districts are already deficient in their ability to provide athletic facilities, playgrounds and courts. Additional parkland in these districts that will support facility development is not readily available. RECenters that provide fitness and aquatics in these districts are also currently over capacity. In each alternative, recreation areas such as athletic fields and golf courses are removed from Fort Belvoir, thereby increasing the demand for public recreation services in the area.

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The Socioeconomics section suggests that growth in the area resulting from BRAC will impact public services in the short term, but that increases in the tax base will address the impacts over time. Public capital facility improvements are generally funded by general obligation bonds rather than taxes. Capital investment needs are significant across the county and compete for limited bond funding. The socioeconomic growth impacts therefore may not be as short term as predicted in the DEIS.

The EIS indicates that the Preferred Alternative would impact on-base recreational facilities through closure of the South Post 9-hole golf course, a walking trail surrounding the golf course, and a playing field across from Pence Gate. No plan is provided for the replacement of these recreational facilities, although the addition of a new family camping area is included in the BRAC plan. The loss of the golf course, walking trail and playing field will add to the demand on Fairfax County's parks and recreational facilities, and the family camping area would not serve to mitigate this impact (and as noted earlier, we don't see the linkage of the family camp to BRAC actions). The Army should develop recreational facilities on the western EPG area to help offset additional demand created by the new development associated with the BRAC action.

As noted earlier, the disposition of the Accotink Creek EQC and areas west of the EQC are of great concern to us. As noted in our scoping comments, the EPG site represents an opportunity to address much of the existing and projected parkland and recreational facility deficits in the Springfield area, and the Accotink Creek stream valley provides a major greenway corridor through the Springfield area of the county. Increasing residential and commercial development in the region caused by the BRAC action will further stress existing parkland and facilities. Use of this area for public purposes will require extensive environmental cleanup prior to any land transfer to ensure safe public use. However, the county continues to view the long-term dedication of this area for public park use as a critical issue. Section 4 of comment B above addressed our concern regarding the incompatibility of the proposed actions with the county's Comprehensive Plan as well as previous commitments to the dedication of parkland at EPG. We reiterate these concerns.

We continue to recommend that the EIS indicate how the development of the EPG site will occur in a manner that is consistent with the county's Comprehensive Plan. The area west of the EQC is designated in the Comprehensive Plan for public park use and other needed

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public uses—the plan for this area includes 225 acres of Stream Valley/Greenway parkland, 60 acres to be developed as a complex of lighted active recreational fields for use as a sports complex, and 25 acres to be developed as a multi-use activity center for cultural and seasonal events. The Preferred Alternative and all three of the other Alternatives designate the entirety of this area for Professional/Institutional use. At a minimum, this area should be designated as Community use in recognition of the Environmental Quality Corridor, the Comprehensive Plan designation and the 135 acres promised to the Park Authority; ideally, the EQC and other environmentally-constrained land on the EPG site would be designated as “Environmentally Sensitive” areas. The prior commitment to the dedication of the 135-acre area ought to be fulfilled. Dedication of this area for recreational purposes would provide needed recreational opportunities for the federal employees who would be relocated to the area as well as for the public at large.

L5.48

H. SCHOOL NEEDS

The DEIS identifies a projected increase of 4,340 children in Fairfax County as a result of BRAC, with an increase in school age children of 3,258. The DEIS references a Federal Impact Aid Program that could provide funding to the local school system and notes that the National Defense Authorization Act for FY 2006 included \$7 million to be dispensed to school districts that are most heavily impacted by an increase or reduction in military students due to BRAC and other Army initiatives. It is not clear to what extent the Fairfax County Public Schools would be eligible for such funds or that such funding would begin to mitigate the impact of enrollment growth. We are concerned the funding that would be provided to assist Fairfax County Public Schools in accommodating the additional enrollment would be less than that which is expected from private developments that also result in substantial enrollment increases. Specifically, to address the total impact of 3,258 school aged children (if all of these children attend public schools) will require the equivalent of 1.95 elementary schools (900 capacity), 0.4 new middle school (1,250 capacity) and 0.4 new high school (2,500 capacity) for a projected facilities cost of \$131.5 million. Adjusting this need against the existing capacity available in the area eliminates the high school need and reduces the middle school need to 0.32 new middle school buildings. The adjusted facility cost for additional middle and elementary school capacity is \$77.1 million.

The only action that the DEIS recommends to address the projected school enrollment increases would be for the Army to “confer with potentially affected school districts on estimated student enrollment increases that could occur if the Preferred Alternative is implemented.” Our scoping comments recommended that, if a significant increase in the number of school age children was to be anticipated, sites should be identified for new schools that would be sufficient to accommodate the expected increase. This comment pertained to development of new residential units on the post itself. BRAC implementation will significantly impact schools off of the post. The Army should commit to a financial contribution sufficient to address the adjusted facilities costs required by the increase in students as a result of BRAC activity.

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We have expressed concerns in an earlier comment regarding the proposed changes to Fort Belvoir's land use plan and uncertainties that these changes would create in terms of long-term population and employment potential. We reiterate the concern regarding potential expansions to on-post housing, as the plan changes would seem to provide the potential for significant on-post housing increases. These increases would have implications to the county's public school system that have not been addressed in the DEIS. Again, we recommend that land use plan changes be the minimum necessary to address the BRAC relocations and that broader planning initiatives be pursued through separate actions.

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We noted earlier our concern that the DEIS does not address the extent to which there may be secondary growth associated with the BRAC relocations resulting from potential future contractors who may choose to congregate near these agencies. We noted the potential transportation implications of these decisions. This secondary growth may also result in further increases in the number of school age children. The EIS should address the impacts that secondary growth will have to the public school system.

I. BIOLOGICAL RESOURCES

It is difficult to fully understand the implications of the various build alternatives to biological resources without graphical representations of: (1) vegetative communities on the Main Post and EPG sites; and (2) development envelopes as they relate to the vegetative communities. We reiterate our earlier comment (see part D of this attachment) regarding the need for natural resource information.

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The DEIS identifies 164 acres of impacts to vegetative communities for the preferred alternative, 155 acres for the Town Center alternative, 116 acres for the City Center alternative, and 165 acres for the Satellite Campuses alternative, with the latter figure including 56 acres of impacts to urban areas at Davison Army Airfield. It is not clear why "urban area" impacts are included in the assessment of vegetative community types for this alternative. Further, these acreage figures make little sense when compared with the "acreage converted to impervious surfaces" that would be associated with these four alternatives (183, 142, 131, and 207 acres, respectively). In most cases, the additional impervious cover figures are greater than the vegetative community impact figures—are we correct in assuming that some vegetated areas (e.g., maintained turf, "urban" areas) are not included in the vegetative community type data? Clarification (and preferably detailed graphics) should be provided.

The loss of tree canopy on these properties has potential to significantly impact overall tree canopy levels in Fairfax County and to disrupt the delivery of ecological, environmental and socio-economic benefits that the trees on these properties are delivering to the community at large. Therefore, serious efforts should be made to preserve forested areas during the initial design and construction phases of this project. The DEIS does not specify the tree

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replacement efforts that will be pursued to mitigate these impacts. There are general references on page 4-271 to replacement of “habitat lost to development with native community habitat” and to Fort Belvoir Natural Resources management policies and goals, as specified in the post’s Integrated Natural Resources Management Plan. However, it is not clear if the tree replacement policy referenced in the INRMP is current, and there is concern regarding whether Fort Belvoir will apply tree replacement efforts to the EPG site, where much of the tree cover is immature. The EIS should provide clarification regarding Fort Belvoir’s tree replacement policy and how it will be applied for the BRAC projects. It is our view that the early/mid successional vegetation within portions of the EPG site provides ecological services (as evidenced by the identification of much of the eastern half of the EPG site as Partners in Flight Priority Bird Habitat on Figure 4.8-1 and the discussion on page 4-263 of bird habitats) and that it would be appropriate to mitigate for the loss of these services. The tree canopy that would be removed to accommodate new development (even where in an early/mid successional stage) should be restored via reforestation and landscape tree planting, and a commitment should be made to the preparation and implementation of a tree restoration plan (ideally a graphical representation of where restoration efforts will be pursued). If space for tree planting is lacking on Fort Belvoir, we would encourage Fort Belvoir staff to coordinate with the county’s Urban Forest Management Division and Stormwater Planning Division for ideas as to where planting could occur near the post.

In addition to losses of forested acres and tree cover, the Fort Belvoir BRAC DEIS indicates that other vegetative cover and habitat types will be impacted. The EIS should be revised to provide acreage figures of other non-forested impacts. Special attention should be given to avoiding impacts to high quality vegetative stands in community types such as meadow and old field, shrub lands, etc. in addition to already identified sensitive resources. Efforts should be made to avoid impacts to these areas especially when adjacent to other high quality habitats. Where impacts cannot be avoided, mitigation could be attained by providing similar acreages of impacted vegetated types elsewhere on Fort Belvoir that would then be managed for that cover type (e.g., mitigated meadows and old fields should be maintained in an early succession stage to prevent eventual loss to forest cover in order to maintain the important biological services provided by meadows and old fields).

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Page 4-270 identifies impacts to habitats that would occur for the preferred alternative, including the loss of eight acres of sensitive flora habitat and six acres of sensitive fauna habitat. This likely includes areas on the EPG rated as medium- and high-quality habitat for small whorled pogonia and could potentially include habitat suitable for the wood turtle (which would be expected to be concentrated in larger, low-lying areas but will use upland habitat to lay eggs). These species are indicators of environmental health. Preservation of their suitable habitat means preservation of relatively high quality ecosystems that harbor many species. Therefore, any infringement of the habitat for sensitive species or on sensitive communities should be minimized so as to preserve the maximum amounts of these land areas as possible. While we recognize that impacts to the small whorled pogonia habitat on the EPG site will be indirect (e.g., edge effects and habitat fragmentation) and that they

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would be related to the proposed and essential extension of the Fairfax County Parkway, natural resource plans for the EPG site and future planning efforts on the site should protect these areas to the extent possible.

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The southwest post area is the most important remaining undeveloped large land area at Fort Belvoir. It contains the largest number of sensitive resources, lies between the flowing streams and estuaries of Accotink and Pohick Creeks, contains a high percentage of steep slopes and erodible soils, and would be highly impacted by development activity. Ideally, the entirety of this area would be preserved for natural and cultural resource protection and management with no development and limited activities. We commend Fort Belvoir for focusing the proposed development away from this area for all alternatives and would stress the need for sensitivity to the resources in this area as future consideration of the Operations Security Evaluation Group Training Facility (#29 of the on-post cumulative construction/renovation projects identified in Section 5 of the DEIS) occurs.

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Wetland impacts should be mitigated as close to the source(s) of impacts as possible, and preferably within the same watershed as the impact(s). The Stormwater Planning Division of the Department of Public Works and Environmental Services may have suggestions regarding wetland mitigation sites.

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The DEIS indicates that transportation projections will require construction through Resource Protection Areas and Environmental Quality Corridors. Road design and construction practices should be pursued in a manner that minimizes resource impacts. Examples include: locating stream crossings to minimize floodplain/EQC impacts; utilization of bridges or, when bridges are not possible, open-bottom culverts in order to maintain natural stream flow; incorporation of low impact development stormwater management practices to provide water quantity and quality controls; incorporation of wildlife passage tunnels and larger culverts to facilitate safe wildlife movement across road corridors; use of native plants in stabilizing roadside areas and to avoid frequent mowing of shoulders and medians; ensuring that invasive plant species are not used in stabilization efforts; and control of invasive plant species during stabilization and restoration project establishment phases. Road and utility crossings of EQCs should be designed in a manner that will minimize disturbance associated with these crossings.

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Page 4-271 indicates that projects in the North Post area “could indirectly encroach upon the Forest and Wildlife Corridor and create additional edge effects and invasive species incursions.” For alternatives that would locate projects near this corridor, projects should be set back from the corridor such that these impacts will be avoided.

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J. CHARACTERIZATION OF IMPACTS

It is difficult to come to conclusions regarding whether any one alternative should be preferred over the others for a number of reasons. We have previously discussed the need for

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better graphical information regarding environmental conditions and impacts and view this as an impediment to gaining a full understanding of the implications of any alternative. Also of concern is a need to define the terms that are used to summarize most of the impacts, such as “minor adverse,” “minor beneficial,” and “moderate.” Interestingly, these terms are not used in the discussion of transportation impacts; instead, adverse transportation impacts associated with the proposed BRAC relocations are considered to be “significant.” We would consider these impacts to be “major” absent commitments to fully implement mitigation measures.

There is also a need for a concise yet comprehensive summary of impacts for each alternative that is presented in a manner that facilitates comparisons among alternatives. The Final EIS should present a comparative matrix that summarizes comprehensively the impacts associated with each alternative. Summary tables are presented for some of the individual sections (e.g., the water resources summary table on page 4-256); a more comprehensive presentation is needed of each of the types of impacts evaluated.

K. SUPPORT SERVICES

A net increase in 22,000 employees at Fort Belvoir will generate considerable needs for support services, including retail opportunities, restaurants, child care facilities, recreational facilities and emergency services. The DEIS does not address the extent to which the demands for support services will be satisfied through on-site facilities, the extent to which the employment figures presented in the DEIS (and associated impact evaluations) include employment that would be associated with support services and the extent to which such facilities could be expected to be pursued as additional development subsequent to the BRAC relocations. There is a need for a better understanding of the land development implications of the need for on-site support facilities that the various alternatives would generate. The EIS should provide these clarifications. While we recognize that the net increase of 22,000 employees at Fort Belvoir will likely have substantial economic benefits to the Springfield Community Business Center, the Franconia-Springfield Transit Station Area, and the Richmond Highway corridor, and while we recommend that transit service be established to provide connections between the development sites and these commercial areas throughout the working day, we feel that it is imperative that support facilities be provided on-site in order to minimize vehicle trips to and from the development areas and that the levels of on-site support services that will be needed/provided be identified (both in terms of employment and physical location) and evaluated in the EIS.

With respect to emergency services, the preferred alternative and City Center alternative would include the construction of an Emergency Services Center on the EPG site. Page 4-342 of the DEIS states: “Fort Belvoir plans to construct additional emergency and medical facilities, purchase the appropriate equipment, and bring on the additional personnel to provide sufficient police, fire, and medical emergency response to the new structures and to support the installation’s increased population under the BRAC action.” No information is provided, however, regarding when the new facility at EPG would be operational, the

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anticipated staffing of the facility and how short-term and long-term staffing levels will relate to anticipated demands associated with the new development at EPG. This information should be provided. We also recommend that this facility be incorporated into the Northern Virginia Mutual Response Agreement and that the emergency service/911 system at EPG be interoperable with Fairfax County's 911 dispatch center.

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A new Emergency Services Center would not be provided on the Main Post for any of the alternatives. Would emergency services on the Main Post be sufficient to satisfy demands associated with employment growth?

For each of the build alternatives, two child development centers would be provided—one for the NGA employees and one for other employees. These centers would provide services for 244 and 302 children, respectively. Will these facilities be sufficient in capacity to meet the demands of the new employees? If not, will additional facilities be provided?

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The DEIS does not address other support service needs aside from the recognition of a physical fitness center and shoppette as "cumulative" construction projects that would be provided at the EPG site. If these facilities are intended to serve the new growth at EPG, why are they being considered separately rather than as part of the BRAC action? Would the shoppette be sufficient to meet the retail demands of the employees at EPG? Would it include a gas station? What dining services are proposed for the EPG site? We are concerned that the magnitude of the additional employment at the EPG site may generate considerably more demand for retail and dining services than what is being proposed and that this demand may result in a proposal to develop retail support uses in the western EPG area. The EIS should identify and site on-site support service needs and assess the impacts of facilities that would need to be provided to accommodate this demand.

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L. TRANSPORTATION--GENERAL

Page 4-29 of the DEIS notes that the Congressional Directive regarding the BRAC actions "requires that the transportation system be studied to determine the impacts that would be expected due to the BRAC action, to identify projects that would mitigate and off-set those impacts, and to quantify the needs for new transportation infrastructure." It is notable that transportation mitigation commitments are not made in the DEIS. As noted earlier, we feel that transportation mitigation actions for the preferred alternative, as identified in this DEIS, should be committed to as part of the Record of Decision. The BRAC action is expected to have significant adverse impacts on the transportation system immediate to the installation and extending several miles in each direction. Impacts to the I-95 corridor are expected to be particularly severe. Construction of a six-lane Fairfax County Parkway section along the EPG is identified as fundamental to the development and operation of the preferred BRAC land use alternative. Relief of congestion on I-95, north and south of the Fort Belvoir sites, is also identified as a critical need. Transportation improvements to address these anticipated impacts should be a component of the BRAC Record of Decision. We have a number of

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recommendations for commitments to transportation improvements that should be recognized in the Record of Decision—please see section A of this attachment. A discussion of transportation improvements identified within transportation planning documents begins on page 4-56. We feel that the Defense Access Roads program should pay for the full six lane improvement of the Fairfax County Parkway by 2011; four lanes are insufficient to accommodate BRAC volumes on this facility. Table 4.3-8 should also show the six lane improvement of the Fairfax County Parkway (VA 7100) from Rolling Road/VA 7900 to Fullerton Road.

The BRAC date is set at 2011. Transportation improvements that are proposed in this EIS must be in place prior to that date if the assumptions of the alternatives are to work. A transportation strategy that would address the timeline, funding, and a project execution plan should be included in this document. If not, the transportation improvements remain open ended and BRAC moves could occur without the required transportation infrastructure. We again recommend the development of a comprehensive strategy to implement and fund the required transportation improvements that would address the adverse impacts to the transportation system as a result of BRAC.

Section 4.3 of the DEIS indicates that all build alternatives would have significant adverse impacts on transportation. The transportation mitigation projects identified for the preferred alternative are based on the broad analyses performed for the DEIS; detailed traffic operational studies have not yet been performed. Considerable further planning and analysis will be needed to adequately identify and address roadway deficiencies in the local network off post and along access routes/points to Fort Belvoir and EPG. Any needed improvements that are identified through the more detailed operational analysis should be included in the transportation mitigation plan.

The county's Comprehensive Plan for the EPG site includes major transportation improvements to support development at this location. To what level does the DEIS take into consideration the transportation mitigation measures shown with those in the county's Comprehensive Plan?

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The county and state have very limited funding to complete any of the recommended transportation mitigation projects, and it is our view that transportation mitigation projects ought to be funded by the federal government. Does the Army share this expectation? If not, to what extent does the Army expect the State and county to fund and construct the transportation projects? Any such expectations should be identified within the EIS.

L5.62

The DEIS identifies costs for transportation projects. Are these costs presented in 2007 dollars? Is so, they should include a cost escalation factor—the actual costs will presumably be higher in the future depending on the time frames for construction. The EIS should address this issue. Did the cost estimates include any contingency money? How would the Army fund the construction of the proposed transportation improvements that would not be

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eligible for funding under the Defense Access Roads program? Does the Army have a long term investment strategy for funding the transportation improvements?

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Will the Army implement a BRAC-related phasing plan that will link the availability of necessary roadway and transit improvements with BRAC-related development?

The proximity of EPG and Fort Belvoir to the Franconia-Springfield Metro and VRE stations could afford opportunities to optimize transit use. The DEIS does not commit or address in sufficient detail how the Army would try to optimize the use of transit; we feel that transit is treated superficially in the report. Only very general thought has been given to how bus service could achieve a 5 or 10 percent mode split (the two scenarios described on pages 4-87 through 4-89). There is no indication of the methodology used in determining the 5 and 10 percent mode share. This leaves the reasonableness of these assumptions in question. In addition, for the 10 percent modal share option, a vehicle reduction of 750 is assumed. However, for this option only 12 additional buses are specified. Assuming every bus is 100% full all the time (an unreasonable assumption!) the twelve additional buses will only be able to serve 500 passengers in the peak hour. This will reduce peak vehicle trips to the base by about 400 vehicles (assuming average vehicle occupancy of 1.2) and not the 725 stated on page 4-84.

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The DEIS does not indicate how the initial startup costs and the ongoing operational costs of increased bus service would be funded.

The Franconia-Springfield Metro station provides access to one of the finest urban rail systems in the U.S. No mention is made of any bus priority measures to increase the attractiveness of the proposed shuttle bus service between the EPG and the Franconia-Springfield Metro station. This type of development should strive to maximize transit trips. The EIS should address in more detail a transit plan and how this plan would be implemented. How would the various transit opportunities in and around EPG and the Main Post (e.g., Metrorail, Metrobus, VRE, Fairfax Connector) be integrated? A detailed plan that integrates the local transit availability should be included in the EIS. This should include a review of local transit service schedules and determinations of any locations for which additional service should be implemented. If additional service is needed to serve the BRAC development, funding for this service should be identified. As an example of a consideration for BRAC, it would not be likely that Fairfax Connector Route 171 could be rerouted due to capacity, demand and scheduling issues. There may be a need to establish a separate route to link EPG with the Lorton VRE station and parking facilities; such a route could reduce travel time for those passengers when compared with a modified routing of existing bus service, and it would not affect existing passengers. A direct shuttle from the Lorton VRE station should be considered; it would be appropriate for direct shuttles for the Franconia-Springfield Metro station and for the Lorton VRE station to be operated by the Department of Defense.

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Insufficient detail on mass transit is provided in this DEIS to develop these mitigation measures to the necessary level. Actions to begin procurement of vehicles, identify funding commitments, etc., should be identified and initiated early so that 2011 opening date can be met.

As recommended earlier, the Army should commit to running a shuttle from the Franconia-Springfield Metrorail station and/or the Lorton VRE station to EPG and/or the Main Post. The Army should also commit to providing shuttle service to retail/commercial areas that are proximate to the EPG site and the Main Post. The Fairfax Connector 171 route would provide bus service to the Richmond Highway corridor from Main Post. Increased service levels on the Route 171 would be driven by demand, and constrained by the availability of resources to fund and operate the additional service.

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The development and implementation of a detailed transportation demand management (TDM) plan would serve to reduce impacts to the transportation system. We recommend that such a plan be developed. This plan should include a strategic plan that details specific actions and trip reductions. As part of this plan, bicycle commuting should be facilitated through the provision of secure bicycle parking facilities and shower and locker facilities within new office buildings. The Army should seek funding for a full time position at Fort Belvoir to manage the TDM program—we suggest changing “could” to “would” regarding the appointment of a TDM Coordinator. As noted on page 4-89 of the DEIS, appointment of a TDM Coordinator before FY 2009 would allow development of program initiatives before BRAC relocation of personnel.

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The I-95 interchange with the Fairfax County Parkway provides a critical link to both the EPG site and the Main Post. The transportation analysis should provide sufficient detail on the operation of this interchange to handle the BRAC-related land use changes. The I-95 northbound movement to Fairfax County Parkway westbound lacks sufficient detail and analysis. This movement provides a critical link, and the EIS should address the necessary improvements (general purpose and HOV lane connections) at this interchange to accommodate the anticipated traffic volumes. In addition, a high occupancy toll (HOT) lane will need to be accommodated at this location. The EIS only addresses the HOV movement at this interchange.

The I-95 interchange with the Franconia-Springfield Parkway is also of note. Additional ramps to/from I-95 general purpose and HOV lanes should be considered. A more detailed operational analysis should be conducted to identify improvements at this interchange.

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The EIS should address Intelligent Transportation Systems (ITS) and their applicability to the transportation system in the Fort Belvoir area. For example, such a system could include variable message signs indicating changes in force protection, gate closures, etc., thereby redirecting traffic to alternative gates and roads and reducing traffic congestion.

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Traffic signal optimization should be considered along the Richmond Highway Corridor, the Fairfax County Parkway, the Franconia Springfield Parkway and perhaps elsewhere.

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The DEIS provides no detailed analysis of Richmond Highway related to the BRAC actions. The relocation of the hospital to a site near the Pence Gate suggests the potential for significant impacts along the Richmond Highway corridor and the Pence Gate access; Richmond Highway impacts and improvements should be addressed in more detail.

L5.68

Improvements to the Kingman Road/Fairfax County Parkway intersection are critical in that the National Museum of the U.S. Army is currently proposed for this area.

L5.69

It should be noted that safety and security are important issues. The adverse effect of increased traffic congestion on response times for emergency services and potential emergency evacuation should be mentioned. Also, vehicle crash rates can be expected to increase with increased volumes and delay times at intersections/roadways near Fort Belvoir.

L5.70

More detail should be provided on several of the mitigation projects identified beginning on page 4-84 of the DEIS, and operational analyses should be initiated in order to affirm their efficacy. In order to meet the BRAC timeline, probable schedules for EIS work and other requirements should be developed as soon as possible. For the transit system, detailed route and service planning should be initiated soon in order to meet the BRAC target date. While a 5 – 10 percent target mode split has been established for impact analysis purposes, transit planning for the BRAC development should strive to achieve higher transit usage levels, as described in Fairfax County Comprehensive Plan guidance for the EPG property.

L5.71

As a matter for consideration to accommodate bus service, the design of the conceptual access point at the Fairfax County Parkway / Rolling Road interchange could include a bus station that would permit buses from outside the EPG to drop and load passengers on one side, while internal shuttle buses would load and drop passengers on the other side. This facility could include a security checkpoint if necessary. The bus station should be constructed in such a way that both external and internal buses would be removed from the traffic flow. For instance, constructing loop ramps to permit buses from both sides to reverse direction would require the construction of an underpass on the connection to Rolling Road; this structure would also provide a covered waiting area for bus passengers. This bus station could be located at another location to serve the EPG site in coordination with Fairfax County.

L5.72

For the potential security operating scenario for Main Post (page 4-135), a bus station that would permit buses from outside the Main Post to drop and load passengers on one side should be constructed at a grade-separated connection between the North and South Posts. This facility would permit buses from outside the Main Post to drop and load passengers on one side, while internal shuttle buses would load and drop passengers on the other side. This facility would include a security checkpoint. The bus station should be constructed in such a

L5.73

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Fort Belvoir BRAC DEIS
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L5.73,
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way that both external and internal buses would be removed from the traffic flow on Richmond Highway and the North Post / South Post, respectively. This station would require one, or possibly two, additional traffic signals on Richmond Highway, depending on the size and configuration of the facility.

L5.74

In response to a number of concerns regarding the travel demand modeling approach and assumptions that would be used during the modeling process a number of meetings were conducted with the Virginia Department of Transportation, Fairfax County Department of Transportation, Department of the Army, and the Army's transportation consultant. In addition this issue was discussed at length during the Board of Advisors and Transportation Working Group meetings and have been supported by a number of members of the county's Board of Supervisors. As a result the state, county, and Army agreed upon a set of basic assumptions and procedures to be used in the transportation modeling approach. The process to reach agreement was completed over an extended period of time, required a number of meetings, and was done in a very cooperative manner. The agreed upon Travel Demand Modeling Approaches are listed under section 4.3.1.3 (page 4-33) of the DEIS.

That being said, in general, very little information is provided on some critical assumptions made and factors used in the transportation modeling and capacity analysis. Therefore it was not possible to review the reasonableness of these assumptions and factors. Examples:

- Spreading trips to alternative routes due to capacity constraint is mentioned but the extent of the spread is not quantified. This item alone can change BRAC-related volumes along critical highway sections by as much as 20%-30%.
- Factors used in capacity analysis such as the peak-hour factor, the percentage of trucks, the geometry, etc., can influence capacity by as much as 20%-30%.

It is strongly recommended that the assumptions and factors used in the report be documented in order to evaluate their reasonableness. We have a number of specific comments and questions regarding the transportation data provided in Section 4. Please see these comments within Attachment B of this document.

L5.75

The second paragraph on page ES-9 states: "For all the alternatives, implementing the BRAC action would decrease both the number of vehicles and the total vehicle miles traveled (VMT) within the region. This conclusion is based on the net reduction of 1,700 personnel from the region as a result of the BRAC relocations. This seems unlikely when the full impact of BRAC is considered, including private development and Enhanced Use Leasing (EUL) activities that are likely to offset the personnel reduction. Department of Defense personnel vacating space in Crystal City (and other areas in the Capital region) would relocate to Fort Belvoir. That vacated space would be occupied by some other entity therefore the net reduction might be overstated.

L5.76

At the bottom of page 4-30, the DEIS states: "Typically these [traffic operational] studies are completed following completion of an EIS . . ." – Studies are required to analyze the key effects of a project. For BRAC, the key impact is on transportation. Without traffic

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operation studies, the impacts and potential mitigation costs cannot be determined fully. Completing these studies in sufficient time to accommodate the BRAC schedule is critical. It is recognized that the employment figures associated with the WHS, NGA and Missile Defense Agency relocations incorporate contractors for these agencies who will be working on-site, but the DEIS does not address the extent to which there may be secondary growth associated with the BRAC relocations resulting from other potential future contractors who may choose to congregate near these agencies and the transportation implications of these decisions. The DEIS notes, on the bottom of page 4-79 and top of page 4-80, that concerns have been raised regarding the potential for probable “ripple effects” of induced employment and development in and near the study area, and that the current model cannot assess the impact of these ripple effects. Forecast traffic volumes, therefore, likely under represent actual future conditions. The EIS should address the impacts that secondary growth will have to the transportation infrastructure.

L5.76,
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The Fairfax County Police Department has identified the need for the installation of Uninterruptible Power Supplies (UPS) to select traffic signals in the area. These selected signals would have Battery Back Systems (BBS) installed which would permit 8-12 hours of operation. Having these signals with UPS would be extremely useful in the event of a natural disaster or other event during which power is lost in the Fort Belvoir area or the main travel routes to and from the post. Darkened signals per Virginia Code would be treated like 4 way stops. This would cause considerable traffic congestion in the event of an evacuation. The FCPD would not have sufficient staffing in the event of widespread power loss, especially with other associated emergency duties in the event of a natural disaster or other significant national emergency event, to control traffic manually. Even the deployment of existing portable generators would be prioritized throughout the county and quickly used up.

L5.77

We recommend installing UPS at the following locations:

- Richmond Highway (Route 1) from Old Mill Road to the Prince William County line
- Route 7100 from Richmond Highway to Rolling Road
- Beulah Street from Telegraph Road to Route 7900
- Loisdale Road from Route 7100 to Franconia Road (Route 644)
- Backlick Road from Route 7100 to Route-7900
- Telegraph Road from Beulah Street to Richmond Highway (Route 1)

This would cover all major travel routes to and from the all Fort Belvoir locations (North and South Post, Proving Grounds and GSA). Placing UPS at these locations would give ample signal power supply for an evacuation of the area if needed. Any UPS that is installed would need to meet Virginia Department of Transportation (VDOT) specifications.

M. TRANSPORTATION—IMPACTS OF MITIGATION MEASURES

L5.78

Pages 4-85 and 4-86 identify a series of road network improvements that could be pursued to mitigate impacts of the preferred alternative as they relate to the proposed BRAC relocations. As noted earlier, there is a need for firm commitments to the pursuit of needed mitigation efforts. It is also notable, though, that the DEIS indicates that detailed design studies and potential NEPA studies would need to be pursued for these mitigation measures. It is our view that, because the impacts of the mitigation measures will be directly associated with the BRAC actions, the impacts of these mitigation measures should be considered comprehensively with the impacts of the BRAC alternatives. The implications of any of the alternatives to natural resources have not been fully enumerated in the DEIS because the impacts of the mitigation measures are not being considered.

If it is the Army's intent to proceed with separate NEPA documentation for various transportation improvements, what is the Army's execution plan on developing the NEPA documentation for these projects?

One of the suggested mitigation measures for the preferred alternative and City Center alternative is the extension of Neuman Street to provide access from the Franconia-Springfield Parkway into EPG. It is noted that "existing residences and a building used as a church" would need to be removed. Pages 4-18/19 and Pages 4-22/23 indicate that 19 residences and the church "would be changed from their current designations." We assume that this means the residences and church building would need to be taken and feel that this impact should be presented more directly in the EIS. Another impact of this new access point would be traffic and noise impacts to residences that would remain near Neuman Street. How much increased traffic would use this road? Would any houses remain along this road? What noise level increases would be experienced by remaining noise sensitive receptors? Yet another impact would be the need for a new EQC crossing on the EPG site. Has this been factored into the EQC impacts that are reported for these two options? The EIS should more carefully and critically assess the effects of the proposed Neuman Street access.

It should be noted that access to EPG through Neuman Street is contingent on the construction of the interchange at Neuman Street and the Franconia-Springfield Parkway. If the Army commits to building this interchange, the county would need to approve a Comprehensive Plan Amendment to allow the connection of Neuman Street into the EPG site. The Army should coordinate with staff from the county's Department of Transportation regarding the pursuit of such a Plan Amendment.

L5.79

N. HOUSING

The DEIS discusses the numbers of housing units in the area and suggests that the available housing stock will be sufficient to accommodate the BRAC growth. Broad, countywide housing data are presented in support of this position. It is not clear, though, what the more

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localized housing effects of the BRAC relocations would be, particularly relating to affordability of housing.

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The proposed land use plan would increase the land area dedicated to family housing on both the North and South Posts. However, in the absence of an updated Real Property Master Plan it is unclear how much new housing is planned and how this additional housing could support BRAC. For example, has the number of active military personnel associated with the new hospital and other BRAC relocations been determined and, if so, how might new housing be created to allow some of these people to live on Post?

While it is anticipated that most employees are currently housed, it is expected that new hires with lower incomes will in some cases need housing in the approximate area. Demand for adjacent housing could have an impact on affordability and growth in production. The provision of additional on post housing through the Real Property Master Plan update process could provide a reasonable alternative for military personnel assigned to BRAC relocations; however any additional housing constructed on post should serve a range of household incomes and include a minimum of 12 percent affordable or workforce housing. Further, any proposal to increase on-post housing should identify and mitigate associated impacts on roads, schools, other public facilities, utilities and natural resources.

O. UTILITIES

The Utilities section of the DEIS notes the need for substantial water system upgrades and natural gas distribution network improvements for the preferred alternative, both on the Main Post and at EPG. The DEIS also indicates that a new, 4-acre substation would be needed at the EPG site for the preferred alternative or the City Center alternative. Have all utility system improvements been taken into account in the identification of impacts associated with the preferred alternative? Is the location of the on-site substation included within one of the "infrastructure" projects? If not, where would this substation be located, and what would be the associated impacts?

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5.80

Other alternatives will also have associated utility system improvement needs. Have all impacts of utility system improvements been incorporated into the analyses presented in the DEIS?

The DEIS indicates that the existing sanitary sewer trunk line along Accotink Creek will be sufficient to accommodate flows from EPG; new collection system pipes, interceptors and appurtenances would be needed, though, to convey wastewater from EPG into this trunk line. Are we correct in assuming that the environmental impacts of these facilities have been addressed in the DEIS? If additional impacts are anticipated, they should be identified in the EIS.

L5.81

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L5.82

Page 4-391 of the DEIS indicates that encroachments into the EQC for utility lines will be minimized and that utility crossings of the EQC on the EPG property will occur at road bridge crossings. We support and commend this sensitivity to the EQC.

L5.83

The DEIS identifies needed improvements to the Franconia substation to accommodate electricity needs for EPG (and, for the City Center alternative, the GSA site). Will these upgrades have any impacts to residential properties in the area (in terms of visual/aesthetic conditions)? A plan identifying the location of this substation, surrounding uses, and improvements that would be needed should be provided, and the impacts of these improvements should be discussed in the EIS.

L5.84

Would any new communication towers be needed, either on the Main Post or at EPG? If so, where would such towers be located? How high would they be? Would they be visible from residential properties?

L5.85

The DEIS notes that BRAC actions will most likely consume all of Fort Belvoir's capacity for water and sewer service. What will be the implications in terms of long-range master planning of further development on the post?

L5.86

Fairfax Water, which would provide public water service for the EPG property, has provided the following guidance:

- Access to public water for the EPG site will be provided on a retail basis in accordance with the "*Rules and Regulations for the Furnishing of Water Service*" and the effective "*Schedule of Rates, Fees, and Charges.*" Both documents are available from Fairfax Water or may be viewed at www.fairfaxwater.org.
- Fairfax Water will own, operate and maintain all water system infrastructure necessary to serve facilities located on the EPG site.
- Prior to construction, site plans for the EPG shall be submitted to Fairfax Water and the Fairfax County Fire Prevention Division for review and approval. Minimum submittal requirements include:
 - Preliminary Site Plan—depicting the horizontal water main alignment relative to other utilities and structures. The plan should include proposed main sizes, along with valve, hydrant and meter locations.
 - Final Site Plan—depicting both horizontal and vertical water main alignments. The final site plan should include required test hole information demonstrating appropriate utility clearances.
 - Easement Plats—Pipelines owned by Fairfax Water not located in public rights-of-way must have a corresponding easement agreement and property plat. Pipelines owned by Fairfax Water located on Federal property must be provided with an alternative permit agreement and plat.
- Fairfax Water intends to incorporate an increase in pipeline diameter up to 24-inches within select mains installed as part of the EPG development. Fairfax Water will

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contribute the cost to increase pipe diameters from the minimum required to meet development needs to 24-inches to construct a contiguous 24-inch water main across the EPG site from Backlick Road to Rolling Road.

- Public water for facilities constructed on the Main Post will be supplied by Fairfax Water on a wholesale basis through existing metered connections. Wholesale water purchases shall be in accordance with the existing Water Supply Agreement between Fairfax Water and Fort Belvoir. As a wholesale customer, Fort Belvoir is responsible for water distribution facilities on the Main Post, including water storage for demand equalization, fire protection and emergency supply.

L5.86,
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P. TRAILS

Our scoping comments presented a series of issues and recommendations pertaining to nonmotorized transportation, and some of these issues were not addressed in the DEIS. We reiterate our scoping comments:

- The EIS should include a map of planned pedestrian and bicycle trails and demonstrate how they will connect to those shown on the adopted Countywide Trails Plan. Development of appropriate segments within and adjacent to Fort Belvoir should be examined. Furthermore, trails along Richmond Highway and the Richmond Highway/Telegraph Road connector road as well as the Potomac Heritage Trail should be identified and incorporated onto the map of planned trails. The EIS should identify mechanisms through which the new trails will be funded and constructed.
- The EIS should address the extent to which pedestrian and bicycle connections will be provided between on-post and/or near-post housing and on-site employment areas.
- The EIS should address the extent to which pedestrian connections and facilities (e.g., bus shelters) will be provided in order to facilitate transit use by new and existing employees. Note—we acknowledge that the DEIS identified “appropriate accommodation” of transit riders and others arriving on foot through the provision of on-post pedestrian paths among a number of potential transportation demand management efforts.
- The EIS should address the extent to which new office buildings will be designed to accommodate bicycle commuting (e.g., secure parking facilities, locker and shower facilities). Note—we acknowledge that the DEIS included these ideas among a number of potential transportation demand management efforts that could be pursued to mitigate transportation impacts and encourage the facilitation of bicycle commuting through such efforts.
- The Accotink Stream Valley provides a major greenway corridor through the Springfield area of Fairfax County. The Cross County Trail, a 40-mile trail that runs from the Occoquan River in Lorton to the Potomac River in Great Falls, traverses a portion of the Accotink Stream Valley. As the EPG site is developed, additional trails along the Accotink Stream Valley should be developed and planned to link up with the Cross

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County Trail to provide a link between the EPG area and the Springfield Community Business Center as well as Lake Accotink to the north.

As noted earlier, we have particular concerns regarding the Accotink Creek stream valley on the EPG site, as the proposed land use plan map identifies the entirety of the EPG site in the "Professional/Institutional" category and as it is not even clear that the stream valley will be accessible to the public. We continue to stress the need for dedication of the EQC area to the county's Park Authority and the provision of a stream valley trail in this area.

In addition to the major regional trail systems noted in our scoping comments, there are other such trail systems in the area, including the Interstate Route One Bikeway and the Fairfax County Parkway Trail among others. All of these trails are identified on the county's adopted Trails Plan, and we recommend that Fort Belvoir's planning efforts (including BRAC) incorporate trails consistent with the Trails Plan.

The EIS should include a map of planned pedestrian and bicycle trails and demonstrate how they will connect to those shown on the adopted Countywide Trails Plan. Development of appropriate segments within and adjacent to Fort Belvoir should be examined. Furthermore, trails along Richmond Highway and the Richmond Highway/Telegraph Road connector road as well as the Potomac Heritage Trail should be identified and incorporated onto the map of planned trails.

The National Park Service has advised county staff that, as part of the mitigation for the project, the Park Service encourages completion, between Mount Vernon and the Occoquan National Wildlife Refuge, of a pedestrian, bicycling and water trail network as segments of the Potomac Heritage National Scenic Trail, including construction of a segment of the Potomac Heritage National Scenic Trail similar in function to the plan completed by the U.S. Army Corps of Engineers in 1996. (See, e.g., Eglin AFB and Avon Park AFR along the Florida National Scenic Trail.) Completion of the network would help substantially to address the increased demand for recreational opportunities resulting from implementation of the BRAC recommendations, as well as provide transportation alternatives in the vicinity of the post. In particular, the network should include a non-motorized connection to and including the planned U.S. Army Museum, contributing to the network of nationally-significant sites in the Trail corridor.

L5.88

Q. COMPATIBILITY WITH RESIDENTIAL AREAS NORTH OF EPG

Figure 2-7 identifies some sort of use along the northern edge of EPG a short distance west of Backlick Road. What will this use be? A parking area? What will be the impacts of this facility to the residential area to the north—will there be visual impacts? Will there be lighting impacts associated either with this use or the broader EPG development? Will vehicle exhaust be of potential concern? The EIS should provide more graphical and descriptive details regarding plans for this area and the potential impacts associated with these plans.

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The county's Comprehensive Plan recommends that a vegetated buffer at least 100 feet in width be retained along the northern boundary of EPG, to be supplemented with additional landscaping as needed. How much of a tree save area will be retained between the development and the residential area? Will there be overall lighting impacts associated with the EPG development, particularly to the residential area to the north? Does the Fort Belvoir Installation Design Guide follow county requirements pertaining to lighting (i.e., use of full cut-off fixtures)? Details are needed and are not provided in the aesthetics/visual resources section.

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R. CULTURAL RESOURCES

We are concerned about adverse effects to all cultural resources which are potentially eligible, eligible and listed on the National Register of Historic Places and to the Historic Overlay Districts and other historic properties and sites. Responsibilities under Section 106 of the National Historic Preservation Act need to be fulfilled for all applicable resources. As a local government, Fairfax County is a consulting party by-right and requests to participate in the Section 106 process including the development of the Programmatic Agreement.

L5.89

The DEIS characterizes adverse effects to cultural resource as being minor but recognizes that assessments of adverse impacts will "depend on the exact location of the proposed projects and the specific design details of the projects." The DEIS notes that "many of these project details cannot be determined until Fort Belvoir initiates the project design process" and that "until these details are developed, the exact nature and extent of adverse effects cannot be determined." The DEIS then summarizes potential effects to cultural resources in very general terms. We are concerned that any conclusions regarding the "minor" nature of potential impacts to cultural resources may be premature. Potential effects to cultural resources could comprise adverse effects that are much greater than minor (Page 4-298). The statement "Long-term minor adverse and beneficial effects could occur to historic properties as a result of implementing the Preferred Alternative land use plan" is misleading. There could be more substantial adverse impacts resulting from construction. Reference should be provided as to how the exact nature and extent of adverse effects will be identified and addressed. Will this be done through a programmatic agreement?

There should be a table in the EIS that enumerates ALL archaeological sites discovered on the post with their Smithsonian Trinomial numbers (state site numbers). The table should include the site numbers, names of the sites, periods to which the sites date, level of investigation, and assessment of significance. The EIS should identify, for each alternative, which of these sites may be impacted. With the limited information provided (including lack of information on archaeological sites and the gross scale of the map), it is impossible for the reviewer to assess the potential adverse effects to cultural resources. The DEIS indicates that a list of sites is available in the Integrated Cultural Resources Management Plan, however,

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unless the reviewer is provided with the ICRMP, review is difficult. Site information needs to be provided either in the DEIS or in the DEIS Appendices. This is a significant omission.

The Fairfax County Park Authority would also like the Army to provide an interpretive plan including brochures, signage, exhibits, Web sites, etc.

L5.90

Page 4-288 indicates that no landscape or viewshed surveys have been conducted for the EPG or GSA sites. Why? Will such surveys be performed? Are noise and lighting impacts of concern at either of these sites?

L5.91

The discussion of known archaeological sites on page 4-289 states that “. . . the GSA Parcel has not been surveyed for archaeological resources, the parcel has been heavily disturbed by construction of the buildings (all warehouses) and parking areas, and by construction of the adjacent I-95 corridor.” We feel that this statement is misleading. There are no recorded sites because there has been no archaeological survey. In heavily urbanized areas, where there is intense development, National Register eligible and listed archaeological sites remain in areas that are “islands of preservation.” Deep features, such as cellar holes, trash pits, wells and cisterns, are often found intact beneath paved parking areas. Unless there is documentation of wholesale grading to sterile subsoil across this parcel, we would not concur that the parcel can be written off on the basis of disturbance. Archaeological survey should be done to determine if sites are present.

L5.92

It should be noted that any disturbance to burials in any of the cemeteries on the post (regardless of their National Register status) is subject to the provisions of the Virginia Antiquities Act, Code of Virginia, Section 10.1-2305 and/or any other applicable Army regulations. This Act was put in place to protect historic cemeteries and in order to treat cemeteries and human remains with dignity. Should any burials be discovered or scheduled to be disturbed during construction, work should stop immediately and the Virginia Department of Historic Resources should be contacted.

L5.93

Figure 4.9-1 on page 4-291 displays historic resources on and near the Main Post of Fort Belvoir but does not display cultural resources near the EPG site. It would appear that the Region of Influence may have been extended three miles from the Main Post but not three miles from the EPG site. Has the three mile area around the EPG site been taken into consideration? If not, why not? There are several heritage resource sites within a three mile radius of EPG which need to be taken into consideration.

L5.94

In the discussion of the Interwar Period on page 4-284, the DEIS cites the following:
“. . . standardized architectural plans for installations throughout the nation”
“. . . design philosophies of City Beautiful and Garden City influences with a more traditional collegiate approach, resulting in a landscape that maintained practicality while responding to natural surroundings in a flexible and aesthetic manner”

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“Despite significant expansion throughout the 20th century, particularly in the northern portion of the installation, the historic landscape plan of the southern core has remained intact.”

It is suggested that these design principals and philosophies be adhered to in the new development as one way to protect the cultural resources and provide for compatible development. Fort Belvoir should consider including this idea in the Programmatic Agreement.

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On page 4-292, the Area of Potential Effect (APE) relating to architectural resources does not appear to be clear and well defined. How was the APE determined? What criteria were used to determine and define close proximity? How does this compare to the APE for archaeological resources cited on page 4-289?

L5.95

The discussion of beneficial effects of the Town Center alternative on cultural resources (page 4-306) suggests that a redesignation of some areas from “Administration & Education” to “Residential” would be beneficial in that it would be easier to screen residential uses than nonresidential uses. This has not proven to be true in practice with the Residential Communities Initiative project. The inclusion of specific standards in the programmatic agreement would be useful in furthering the goal of screening sensitive cultural resources from adjacent residential development. In order to provide a minimum standard 50’ buffer area for adequate screening, the following steps are suggested: 1) preserve existing vegetation and topography that currently serves as a buffer; and 2) introduce new plantings, berming and/or fencing.

L5.96

Table 4.9-10 on page 4-316 summarizes potential impacts associated with the various land use plan alternatives, but the table does not provide any information for the preferred alternative. In addition, information on this table appears to conflict with other tables in this section, and clarification is needed regarding how the land use plan impacts may differ from the BRAC-specific impacts. For example, several of the BRAC projects identified in Table 4.9-7 on page 4-307 would have potential adverse effects on the Friends Meeting House and Burial Ground, but Table 4.9-10 suggests that the Town Center land use plan would not have any adverse impacts to this site. There are similar questions regarding the relationship between Table 4.9-10 and impacts identified for other BRAC options.

L5.97

In Table 4.9-11 on page 4-318, Davison Army Airfield buildings are noted as potentially eligible for the National Register. Will a study be conducted of these buildings? Also, there is a need to include a symbol for auditory effects in addition to direct physical effects, indirect physical effects and visual effects. Page 4-296 notes that Section 106 of the National Historic Preservation Act specifically includes audible and atmospheric elements as negative effects.

L5.98

S. WATER RESOURCES/STORMWATER MANAGEMENT/WATER QUALITY CONTROLS

L5.99

The proposed development concept would result in significant increases in impervious cover and potentially significant increases in stormwater runoff peak flows and volumes. However, we feel that, in light of the magnitude of the mandated BRAC relocations to Fort Belvoir, this concept reflects general sensitivity to stormwater management and water quality issues through the concentration of new development within relatively compact development envelopes; the use of structured parking is of particular note and is worthy of commendation. We further applaud the suggestion on page 4-233 that post-construction best management practices be implemented that exceed state and local requirements for the management of stormwater runoff. Since much of Fort Belvoir was constructed with little or no stormwater management, the implementation of such measures would greatly reduce the likelihood of further water quality degradation. We recommend that Fort Belvoir pursue stormwater management retrofitting of existing developed areas that have not been controlled to date.

The DEIS does not provide guidance as to how stormwater management measures will be provided but instead acknowledges that these details will need to be developed during the design of the proposed projects. We are concerned that, without careful integration of stormwater management measures into the development design, it is possible, if not likely, that additional clearing and grading will be needed and that there may be additional encroachments into EQCs, RPAs and wetlands beyond what has been anticipated to date. Table 4.7-8 on page 4-228 identifies drainage problems in the areas of the proposed preferred alternative project sites (and similar tables are provided for the other build alternatives), but there has not been a determination of how these problems will be addressed through stormwater management efforts. In order to ensure that appropriate controls are provided (and that these controls can be sited to avoid impacts to RPAs and EQCs), more work, at least conceptually, should be done up front and concepts should be presented as part of the EIS review. Otherwise, it is not clear that impacts to vegetated communities, RPAs, EQCs, and wetlands will be limited to what is presented in the DEIS.

We feel that stormwater management plans need to be developed at this time and request the Army to share plans of suggested stormwater management facilities with the county once these plans are developed. We feel that it is essential that stormwater management measures will be provided that are consistent with county requirements regarding stormwater management, Chesapeake Bay Preservation Areas, Floodplain Regulations, Erosion and Sediment Control requirements and adequate outfall (including recently-adopted requirements for proportional improvement to downstream outfalls). Consistent with the Virginia Erosion and Sediment Control Regulations (4VAESO.30-40.19) and Stormwater Management Regulation (AVAC3.20.81), Fort Belvoir should ensure that downstream channels and properties will be protected from erosion and damage due to increases in volume, velocity and peak flow. This can be accomplished through various land management practices including the low impact development (LID) practices referenced in the DEIS. Floodplain elevations should not be raised as a result of the proposed

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development. If stormwater management concepts are not presented in the Final EIS, a commitment is needed to ensure that stormwater management facilities will not create significant additional environmental impacts beyond what is described in the DEIS (particularly in terms of vegetative communities, RPAs, EQCs and wetlands).

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All construction activities should incorporate erosion and sediment controls that will be sufficient to ensure that downstream areas will be protected from sediment and other construction materials that may be present. Stormwater runoff volumes and peak flows should be controlled from the initial stages of land disturbance in order to protect downstream areas from erosion due to increased peak flows and runoff volumes.

T. STREAM PROTECTION/FLOODPLAINS/RESOURCE PROTECTION AREAS

The Town Center and City Center alternatives seem to minimize impacts to water resources in that both of these alternatives concentrate the proposed development in relatively small areas. However, we are unable to draw more definitive conclusions due to uncertainties regarding the future disposition of areas that will remain undeveloped as a result of BRAC (i.e., would the areas that remain open due to the concentration of development under any of the BRAC options ultimately be developed anyway under the land use plan redesignations?)

L5.100

The DEIS provides inconsistent information regarding impacts to Resource Protection Areas. Tables 4.6-27 and 4.8-11 identify differing RPA impacts for the Town Center alternative and for the Satellite Campuses alternative.

There are significant potential impacts to RPAs, and we recommend that these impacts be mitigated through the establishment of vegetated buffer areas elsewhere on the post (or on nearby sites if there is insufficient restoration capacity on-post) that are at least equal to the areas of encroachment.

No stream channels should be filled in, relocated, or channelized. If such impacts are unavoidable, the EIS should address how they will be mitigated. Mitigation/compensation should occur as close to the areas of impact as possible.

Page 4-204 indicates that Fort Belvoir will be evaluating streams using Fairfax County's perennial streams assessment protocol during project planning. We recommend that all streams on the Main Post and EPG be identified as either perennial or non-perennial using the county's protocol. County staff is available to assist with training and/or field work regarding this protocol. RPA boundaries should be determined based on these perennial stream mapping efforts, and all streams should be protected with at least 100 feet of undisturbed forest buffer areas along each side of the stream. It should be recognized that RPA impacts may vary from what is presented in the DEIS because of possible uncertainties regarding the locations of perennial streams on the post.

L5.101

L5.102

Page 4-223 indicates that “riparian areas” are shown in Figure 4.7-1, but riparian areas beyond RPAs are not identified. We note that RPA requirements call for 100-foot buffer areas along both sides of perennial streams (a 35-foot figure is referenced, in general, for riparian areas on page 4-223). We support all efforts to protect and restore riparian buffers to headwaters areas of stream systems above RPAs.

L5.103

Page 4-220 notes that Fort Belvoir may propose, as part of its MS4 permit, efforts to identify and correct stormwater runoff-related problems and to pursue stream corridor restoration projects. We encourage the Army to assess the quality of stream channels on Fort Belvoir and EPG, quantifying specific morphological characteristics and human impacts such as bank height, head cuts and stream crossings. Where areas of degraded stream quality and/or riparian buffer areas are identified, we encourage the Army to restore these reaches and/or buffer areas. We encourage Fort Belvoir to pursue watershed management planning efforts similar to those being undertaken by the county and invite Fort Belvoir to send a representative to serve on the steering committees for the Accotink Creek, Pohick Creek and Dogue Creek Watershed Management Plans. We expect to start the public participation piece of each of these plans in the winter and spring of 2008.

L5.104

There are significant areas of 100-year floodplain on the site. Fairfax County has more stringent floodplain requirements than federal minimum criteria. For example, the county requires, in most cases, no rise in Base Flood Elevation. Floodplain elevations should not be raised as a result of the proposed development.

L5.105

U. HAZARDOUS MATERIALS

For sites subject to contamination by hazardous materials, cleanup levels will need to depend on the use(s) anticipated for the area(s) in question. The DEIS notes that some sites have had remediation sufficient to qualify as closed using health based risk assessments in conjunction with limitations on the future use of the areas. We are concerned that some of these areas may be subject to disturbance and uses that are inconsistent with these limitations. The DEIS identifies the possibility of developing Health and Safety Plans for each affected site in order to confirm that these sites will have had the appropriate remediation before any new land uses and any construction activities that may result in exposures to hazardous materials. Firmer commitments to such mitigation efforts are needed. County staff should be provided with copies of Health and Safety Plans for review and approval and should receive certification at the conclusion of any site remediation with a Health and Safety Plan. The certification would state that all “constituents of concern” will have been removed from the site or all remediation work has been completed as described in the Health and Safety Plan.

The county should be provided with specific documentation on any site that has continuing limitations.

The DEIS identifies several types of potentially hazardous sites in the EQC and western portion of the EPG site but provides little information regarding the status and condition of Petroleum Storage Areas and Solid Waste Management Units at EPG.

L5.106

For purposes of risk assessment, the Accotink Creek EQC on the EPG site and western portion of EPG should be evaluated based on a recreational use in any area where use of the area remains to be determined. As noted earlier, we recommend dedication of the EQC and western portion of the EPG site for public park and recreation purposes. Prior to any transfer of land for public use, all Petroleum Storage Areas, Solid Waste Management Units, Ordnance and Explosives areas and any other hazardous materials site must be cleaned and tested to ensure the safe use by the public.

The EIS should identify the extent to which, if any, ordnance/explosives could be located in the EQC of Accotink Creek and what it would take to find and remediate such occurrences.

V. REMOTE INSPECTION FACILITY

Figure 2-5 identifies a large area within the southwestern portion of the EPG site that would be used for a Remote Inspection Facility, and Figure 2-7 depicts a fairly large structure and significant road network in this area. Yet, aside from a discussion of a “potential security operating scenario for EPG” (page 4-134) that would generally limit visitor and truck access to the EPG site to the entrance off of the Fairfax County Parkway/Rolling Road interchange (an implicit recognition of the need for some sort of facility in this area) and a brief reference to topographic impacts of the preferred alternative (page 4-190), we were not able to find any references to this facility in the DEIS. The facility is not identified as a proposed construction project in Table 2-3 or Figure 2-6, and no mention is made of it in the identification of on-post development not related to BRAC (pages 5-8 and 5-9). This facility would appear to have the potential to cause a broad range of adverse environmental impacts, and it is unclear if the impact information provided (e.g., acres of loss of vegetation communities, additional impervious cover, etc.) accounts for this facility. Clarification is needed.

L5.107

W. DISPOSITION OF VACATED FACILITIES

The DEIS doesn't clearly address what will happen to facilities that will be affected by departures from Fort Belvoir (see the note on Table 2-2 on page 2-12). Will all of these facilities be re-used by incoming BRAC workers? If not, what will happen to the vacated facilities? What will happen to the existing DeWitt Hospital? Could vacated space be leased to public or private sector entities that are currently not at Fort Belvoir, thereby further increasing employment population at the post? If there is any potential for further increases in employment resulting from the re-use of vacated buildings, it would be appropriate for the EIS to address the magnitude and potential impacts of these additional on-post populations.

L5.108

**Draft Environmental Impact Statement for Implementation of 2005 Base
Realignment and Closure (BRAC) Recommendations and Related Army Actions
at Fort Belvoir, Virginia
Comments from Fairfax County, Virginia**

Additional Issues

This attachment presents a compilation of comments identifying issues in addition to the major issues identified in Attachment A. These comments were identified through a multi-agency review of the Draft Environmental Impact Statement. The following agencies participated in this review:

County Executive's Office (Fairfax County Environmental Coordinator)
Fairfax County Department of Housing and Community Development
Fairfax County Department of Planning and Zoning
Fairfax County Department of Public Works and Environmental Services
Fairfax County Department of Transportation
Fairfax County Health Department
Fairfax County Fire and Rescue Department
Fairfax County Park Authority
Fairfax County Police Department
Fairfax County Public Schools
Fairfax Water

In addition, the National Park Service provided comments that have been incorporated.

Draft Environmental Impact Statement for Implementation of 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia
Comments from Fairfax County, Virginia—Additional Issues

We have the following comments regarding Section ES.6.2 on pages ES-7 and ES-8:

- The first sentence states: “The BRAC action would be expected to have significant effects on the transportation system...” This should state (as does page 4-84) that it will have significant adverse effects, since that is the key finding of the document. Other environmental effects are given as minor or moderate.
- The transportation effects are contingent on assumptions as to future improvements to the network. The Fairfax County Parkway is a network assumption that has huge ramifications and there is no mention in the document of the very real possibility that the missing piece will not be completed by BRAC 2011 deadline. The I-95 Fourth Lane project, expected to be in place by 2011, has been repeatedly delayed over the past decade. At this time, the future of I-95 improvements and potential HOT lanes is uncertain.
- A statement in the second paragraph reads: “Overall, regional travel patterns would be expected to be identical...” This appears to be an overstatement based on the Daily Screen Line Volumes in Fig. 4.3-19 and 4.3-16 showing higher volumes crossing the Occoquan, in the Preferred Alternative 2011 compared to the No Action Alternative.
- Add the following to the third sentence of the second paragraph: “...excepting over saturation of traffic on I-95 extending both to the north and south of these facilities.”
- The following sentence is included in the third paragraph: “Mitigation to address this issue is likely to require a Fairfax County Parkway cross-section in this area of eight lanes, including a two-lane reversible high-occupancy vehicles (HOV) facility.” The County’s Comprehensive Plan does not include HOV lanes on this section of the Parkway.
- Despite the statements that are made in the 5th paragraph, the preferred alternative would also require further work within active traffic zones. Maintenance of traffic and congestion management should therefore be major elements in the adoption of this alternative.
- In the seventh paragraph, “acceptable LOS and delay” should be defined.

(L5.109)

Page ES-11 characterizes the long-term cultural resources effects of all of the alternatives as “minor and beneficial.” It is not clear that the effects to cultural resources would be minimal because specific impacts are not identified at this time.

(L5.110)

Page ES-15 identifies an unavoidable loss of about 113 acres of “natural habitat” for the preferred alternative, yet Table 4.8-4 identifies 164 acres of impact to vegetative communities. This discrepancy should be clarified.

(L5.111)

Fort Belvoir BRAC DEIS
Comments from Fairfax County, Virginia—Additional Issues

L5.112

Hazardous Materials effects (page ES-15) also include increased vehicular transport of hazardous materials to and from the site on area roadways and resultant increases in potential public risk (e.g., spills from crashes).

L5.113

In the section of the Executive Summary addressing cumulative transportation effects (page ES-16), the DEIS states: "On post facilities projects, taken together, would be expected to have negligible effects on Fort Belvoir area traffic". With congested traffic conditions, these projects can be expected to further degrade operations in the localized network. Also, the transportation improvements proposed as mitigating measures will themselves have impacts during construction.

L5.114

Page ES-16 states: "Cumulative effects to land use upon implementation of the Fairfax County Comprehensive Plan over the next 5 years would be negligible if all approved/programmed roadway improvements are realized." Is it realistic to assume that all of these projects will be completed in this time frame?

L5.115

The discussion of the cumulative effects on aesthetic and visual resources on page ES-19 notes that the building of the Operations Security Evaluation Group Training Facility on the Southwest Area would result in the clearing of some of the forested area. Yet the discussion of cumulative effects on biological resources on page ES-17 does not mention this impact.

L5.116

On page ES-20 within the section heading "E.S. 8.1 Transportation," and in relevant chapters thereafter, a section on non-motorized transportation should be included:

Non-motorized transportation. Some employees at the post and in the region could prefer to walk, jog and use a bicycle as a form of transportation. Mitigation would require coordination and planning with Fairfax County agencies, the Metropolitan Washington Council of Governments, and other agencies followed by construction of additional pedestrian and bicycling facilities in the region."

L5.117

Page 1.4 notes that completion of the Real Property Master Plan update will require a separate environmental impacts analysis; can attendant transportation mitigation actions be incorporated into the same document?

L5.118

Under the criteria stated in Section 1.6.3 (page 1-14), the Defense Access Roads Program should fund most mitigation improvements in the vicinity of the EPG location.

L5.119

Page 2-2 identifies improving connectivity as a major planning principle. More detail is needed in the EIS regarding how these transit connections are to be made.

L5.120

Table 2-1 on page 2-4 provides a comparison of land use areas in the current plan for Fort Belvoir with the proposed land use plan. Because of the proposed plan category redesignations, it is not possible to understand the implications of the acreage figures presented in this table. There should be better analyses of the land use category changes in terms of how the current

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Fort Belvoir BRAC DEIS
Comments from Fairfax County, Virginia—Additional Issues

L5.120,
continued

categories (by acreage) would fit into the new designations. This was done for the Administration and Education/Research and Development designations (the second bullet on page 2-3) and should be done for all categories.

L5.121

Page 2-8 notes that the site currently housing Woodlawn Village would be used in the future for a non-BRAC related community use yet to be determined, and the proposed land use map would designate a "community" use in this area. However, Woodlawn Village would retain its "residential" designation for all other alternatives. Why would there be a difference in future plans for Woodlawn Village among the alternatives?

L5.122

Page 2-8 discusses constraints to development but does not define what would be a high enough level of constraint to cause an area to be considered unbuildable. Clarification should be provided.

L5.123

The natural constraints shown on Figure 2-3 (page 2-9) do not appear to incorporate all Resource Protection Areas (at least on the EPG site) as identified on Figure 4.7-1 (page 4-205).

L5.124

The "estimated impervious acreage" column on Table 2-3 (page 2-14) raises questions as to why this information is not applicable to the proposed Corps of Engineers Project Integration Offices, U.S. Army Nuclear and Chemical Agency Support Facility, and modernized barracks.

L5.125

Figure 2-6 (page 2-15) should be updated to reflect a "7" at South Post, as is indicated in the text for temporary Army Corps of Engineers facilities.

L5.126

Figure 2-7 on page 2-16 identifies brown shading as potential structures. Yellow and gray shading is also shown on the EPG site, but there is nothing in the legend of this graphic to indicate what these shades represent. If one or both of these shades is meant to reflect parking areas, how will parking be provided for uses proposed for the Main Post (in that no yellow or gray shading is shown for the Main Post)? More site detail for all areas of proposed construction would be appropriate as, even with complete legends, it would be difficult to evaluate impacts of proposed development envelopes at the scale provided.

L5.127

Pg. 2-22 notes the proposal for an access control point along Richmond Highway across from Pence Gate. More analysis is needed regarding the effects of this new control point (including a new grade separated interchange, signal and turn lanes) on Richmond Highway.

L5.128

Section 4.2.1.2 of the DEIS (pages 4-3 through 4-8) describes the various land areas on Fort Belvoir (the GSA site is also discussed). A description of activities at the Humphreys Engineering Center should also be provided in this section. Though not a part of the BRAC program, this site represents a large land area immediately adjacent to Fort Belvoir and is clearly in the Region of Influence. Impacts of the use of this site should be considered as part of the cumulative impacts assessment. Cumulative growth, environmental and transportation impacts need to be evaluated.

Fort Belvoir BRAC DEIS

Comments from Fairfax County, Virginia—Additional Issues

L5.129 Page 4-12 of the DEIS states that there are two issues of concern in considering effect on areas outside Fort Belvoir: transportation and environmental stewardship. This list should also include recognition of quality of life issues such as housing and education.

L5.130 The gross floor area of the Metro Park development should be included in the discussion towards the bottom of page 4-15.

L5.131 Page 4-16 notes that the Southeast Fairfax Development Corporation has identified 32 "projects of significance" in the Mount Vernon Planning District but that most of these projects are "Small renovation and building addition sites that, in some cases, are confined to façade beautification and signage." We question whether these projects are truly "of significance." Off-post and on-post data collection should be comparable (only include additional gross square footage, acres converted to impervious surface, increases in intensity/density, creation of additional vehicle trips, etc).

L5.132 On page 4-18, the DEIS states: "Re-designation of the South Post golf course from Outdoor Recreation to Professional/Institutional would allow siting of the new hospital; its easy accessibility would benefit numerous outpatients and visitors." While it is clear that the redesignation would be needed for this particular site, the correlation between this re-designation and easier accessibility is unclear.

L5.133 On page 4-18, the DEIS states: "Designation of the northwest corner of EPG as Professional/Institutional would mean that the Army intends to retain this parcel in lieu of transferring it to Fairfax County." In addition to being in conflict with the county's Comprehensive Plan (as noted earlier in our comments), this action would ultimately result in additional transportation impacts. We also note that the preferred alternative would designate the entirety of EPG as Professional/Institutional and not just the northwest corner.

L5.134 Page 4-18 states: "Long term minor beneficial effects would be expected" in terms of land use. The loss of future parkland at EPG for Fairfax County with the Army retaining the parcel in the northwest corner is not beneficial for the county.

L5.135 Page 4-19 notes that seven million square feet of new parking space would be added under the preferred alternative "primarily" in structured parking. Does this number (7,000,000 square feet) represent the 10,700 spaces listed in table 4.2-2? Will any parking be provided through surface lots? If so, what is the general proportion of surface to structured parking in terms of land coverage? We commend the Army for proposing structured parking facilities and feel that structured parking should be stressed throughout the post in order to minimize impervious surfaces and negative aesthetic effects of surface parking lots. Details of projects should include the types and amounts of parking to be provided or a separate list of parking structures that identifies the buildings each parking area serves.

Towards the bottom of page 4-19, the DEIS states: "Use of EPG as the principal location for siting of BRAC-related facilities would alleviate traffic problems..." This is an overstatement, since it creates other problems, such as the possible need for eight lanes on the Fairfax County Parkway, other access points off I-95, etc., especially if the proposed mitigation measures are not in place by 2011.

L5.136

On page 4-22, the DEIS states: "Subsequent high density development at EPG and GSA Parcel might lead the County to limit or reduce the density of other development projects in the vicinity of those locations." This would only be true if transportation or other impacts were not satisfactorily addressed by the Army. Both the EPG (in nodes) and GSA are designated in the Comprehensive Plan for much higher development than proposed in the City Center Alternative (.50 and .70 FAR, respectively).

L5.137

The third paragraph on page 4-23 states that intensities of .50 FAR at EPG and 0.70 at the GSA site would be out of character with the surrounding area. As noted above, the Comprehensive Plan recognizes the potential for these development intensities; we don't view carefully designed, high intensity development within portions of the EPG site as being in conflict with the character of the area (although poorly designed development at these intensities could be).

L5.138

The fourth paragraph on page 4-23 notes that the GSA site is at least a half mile away from the Franconia-Springfield Metro station and that employees and visitors would need to walk this distance to get from the Metro station to any development provided on the GSA site. While the need for access improvements to the GSA site is recognized, it is not clear why the DEIS does not assume that a shuttle system could be established to provide for a relatively short ride between the GSA site and the transit station. We see a real benefit to the GSA site in its proximity to rail and feel that the discussion on page 4-23 is unduly negative.

L5.139

Pages 4-30 and 4-33 discuss transportation analyses and design, but it is not clear who is performing these operations analyses and studies and whether any commitments to perform these have been verified.

L5.140

On pages 4-37 and 4-39, the DEIS identifies roadways within the existing regional transportation network. Not all of these facilities are in full use. The fact that Route 7100 is not completed through the EPG is very pertinent, and this critical gap between Rolling Road and I-95 should be mentioned. Also, the network was greatly altered by the closure of Beulah Street, John Kingman Road, and Woodlawn Road through Fort Belvoir; these roads are not actually "serving" the area.

L5.141

Table 4.3-1 on page 4-43 reinforces the concerns regarding impacts to I-95 traffic, as it shows 2/3 of existing Fort Belvoir employees are coming from locations to the south of the installation.

L5.142

Peak period travel time contours (Figures 4.3-7 and 4.3-8 on pages 4-45 and 4-46) are useful but represent a typical day (without major incidents) and thus do not capture the highly variable travel times that affect people's decisions on relocating.

L5.143

L5.144

The section of the DEIS on "Available Capacity and Performance" (pages 4-50 through 4-57) shows that capacity to the south is severely constrained—this is a major transportation concern for the BRAC action.

L5.145

Table 4.3-4 under represents freeway capacity; a range of 1900 – 2300 would be more accurate. The capacity for HOV facilities is too high—the typical capacity for HOV facilities is 1,600 vehicles per lane per hour, where the goal is to maintain a high level of service in order to make it attractive to potential carpoolers. We also suggest that an intermediate category of expressway/parkway, with a range of 1600-2100 be incorporated. There is a need for clarification regarding "Capacity per lane by facility type." Do these figures reflect a derived capacity developed for planning purposes rather than Highway Capacity Manual (HCM) base capacity (e.g., freeway vehicles per hour of 1,600-1,800 vs. HCM 2,300-2,400)?

L5.146

Table 4.3-3 (page 4-50) does not include trips that pass through the study area. Therefore, it would appear that the traffic totals that are shown underrepresent the magnitude of the impact.

L5.147

The isolated intersection level of service (LOS) figures presented on page 4-54 do not fully reflect operating conditions in a congested network. Also, there are no details in the appendix on assumptions used (e.g., signal timings). Do the LOS analyses reflect conditions for a consistent peak hour (given in Table 4.3-5 as 7:15-8:15 a.m., and 4:30-5:30 p.m.) or LOS for peak hour operations at specific intersections?

L5.148

The basic assumptions for the capacity analysis were not provided (page 4-54, Table 4.3-5), making it impossible to comment on the reasonableness of the capacity analysis.

L5.149

Page 4-58 identifies spot improvements in the area. Improvements to the intersection of Roberts Road and Braddock Road do not appear relevant; also, the current project at this location is for a right turn lane and not a left turn lane.

L5.150

In the "Improvements beyond the Constrained Long-Range Plan" on page 4-60, it is not clear what the intent of this project list is in the DEIS.

L5.151

Page 4-71 identifies four intersections where improvements could potentially be needed for the No Action alternative. We note that there are other intersections in Table 4.3-14 with LOS E and F and question why these intersections aren't listed. We also feel that more detailed operational studies might result in a list of additional needed intersection improvements.

L5.152

Page 4-79 discusses the transportation performance of the preferred alternative under expected conditions. Statements in this section affirm the need for initial construction of a six lane Fairfax County Parkway improvement. The transit mode split estimates in this section are conservative, and do not factor in higher transit demand if better services are provided to the site. The bottom of page 4-79 and top of page 4-80 note that concerns have been raised regarding the potential for probable "ripple effects" of induced employment and development in and near the study area,

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and that the current model cannot assess the impact of these ripple effects. Forecast traffic volumes, therefore, likely under represent actual future conditions.

L5.152,
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The first paragraph on page 4-83 contains the following sentence: "In the evening peak period, egress from EPG would be slow and spread over several hours. As a result, the effects on the regional transportation facilities would be limited as compared to the AM peak period." This assumption is not substantiated anywhere in the report.

L5.153

We note that, in the discussion pertaining to all service concepts (pages 4-88 – 4-89), the expression "Peak Hour Buses" can be interpreted as either bus trips or vehicles. It is suggested that this expression be revised throughout this section to read "Peak Hour Bus Trips," based on the text following the expression in each case.

L5.154

Page 4-86 references improvements that would be provided to Beulah Street. Beulah Street was widened to four lanes per the county's Transportation Plan; what else is anticipated? Clarification should be provided.

L5.155

The second paragraph on page 4-87 states that traffic traveling toward Fort Belvoir on regional facilities has a reverse commute on I-95/395 southbound in the morning, but many of those trips will connect to the Beltway, where congestion is bi-directional.

L5.156

The discussion of transit measures on pages 4-87 through 4-89 is surprisingly general given how critical this issue is to the success of the BRAC relocations. Only very general thought has been given to how bus service could achieve a 5 or 10 percent mode split, the two scenarios described. No conceptual route maps are provided for the five service areas described. No tables outlining demand or capacity for these service areas are provided. No supporting table is provided in the appendix for the capital cost estimate (\$10 million to \$12 million) or the operating cost estimate (\$6 million to \$9 million) presented on page 4-89. Even with the disclaimer that "Detailed route and service planning would be conducted later," it is reasonable to expect considerably more detail in conceptual plans.

L5.157

In the concept for a 10 percent mode share for the Main Post (page 4-88), the service referred to in the paragraph pertaining to western Fairfax County appears to be the Springfield – George Mason University Limited Stop service proposed in the 2003 Regional Bus Study (Washington Metropolitan Area Transit Authority). The activities required to implement this service have not been started, nor has implementation of this service been approved by either Fairfax County or WMATA. Similar bus service is referenced for other alternatives, and our concern applies to those references as well.

In the concepts for 5 and 10 percent mode shares for the EPG site (pages 4-88 and 4-89) we have the following comments:

- U.S. Route 1 in Fairfax County: The service referred to is Fairfax Connector Route 171, one of the five most heavily used routes in the entire Connector network. It is unlikely

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L5.157,
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that Fairfax County would lengthen the trip time of current passengers who utilize this route between Lorton and the Franconia-Springfield Metro to provide service to the EPG as well. The suggested alternative is to initiate a new service which would link the Lorton VRE station, park-and-ride lots near I-95 in Lorton, and the EPG on a 30-minute peak headway. The new service could be scheduled to meet Route 171 trips traveling in the same direction to provide the linkage from Huntington and Richmond Highway.

- Western Fairfax County: The service referred to for the 10% mode share appears to be a combination of the Springfield – GMU Limited Stop service and the Route 50 Rapid Bus service proposed in the 2003 WMATA Regional Bus Study. The service referred to for the 5% mode share appears to be the Springfield – George Mason University Limited Stop service noted in the previous comment. The Route 50 service concept has been modified to operate as a standard limited-stop service rather than the “BRT light” Rapid Bus service; the resulting combined service has been further modified to directly serve the EPG. The activities required to implement this service have not been started, nor has implementation of this service been approved by either Fairfax County or WMATA.

L5.158

The discussion on pages 4-89 through 4-91 (Transportation Management Plan Framework) is general in nature and not oriented to the particulars of BRAC in any detailed way. There is only mention of what a TDM coordinator might do and inclusion of a rideshare facility as a mitigation measure. For example, there is no targeted rideshare mode target range described, and there is no description of mandatory TDM measures that might be implemented to achieve single occupant vehicle trip reductions.

L5.159

On page 4-92, the following statement appears in the last column: “One full bus can carry 40 people, so would remove 40 SOV trips.” This is not correct. A certain percentage of employees who will use transit when available might previously have carpooled.

L5.160

On page 4-166, the Alexandria Friends Meeting House is identified as a noise sensitive receptor. Because the introduction of audible elements that diminish the integrity of the property’s significant historic features is an adverse effect, it is recommended that the Woodlawn Friends Meeting be given consulting party status in the Section 106 process.

L5.161

Page 4-173 indicates that one of the possible mitigation measures for noise would be a limitation on construction to “predominately occur during normal weekday business hours in areas adjacent to noise-sensitive land uses such as residential areas, recreational areas, and off-post areas.” In no case should construction activities occur during times that are inconsistent with requirements of the county’s noise ordinance (Section 108-4-1 of the Fairfax County Code).

L5.162

Page 4-177 notes that Davison Army Airfield would be closed and aircraft operations would potentially cease under the Satellite Campus Alternative in order to allow for the establishment of NGA facilities at this site. However, the DEIS also notes that “there would be no changes to aircraft operations” with the implementation of this alternative. Clarification is needed regarding

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Fort Belvoir BRAC DEIS
Comments from Fairfax County, Virginia—Additional Issues

<p>the apparent conflict between these statements. Would there be a benefit in reduced noise impacts associated with the Satellite Campuses alternative?</p>	<p>L5.162, continued</p>
<p>“Flood zones” identified in Figure 4.7-1 (page 4-205) do not include all floodplain areas as defined by the county’s Zoning Ordinance, and floodplain areas described on page 4-223 may also not include all county-defined floodplains.</p>	<p>L5.163</p>
<p>We encourage Fort Belvoir to apply the same watershed boundaries that are being applied by the county in its watershed planning efforts. This would consolidate the seven watersheds referenced in the DEIS (Accotink Creek, Accotink Bay, Pohick Creek, Pohick Bay, Dogue Creek, Gunston Cove and Potomac River) to the three watersheds referenced in county efforts (Accotink Creek, Pohick Creek and Dogue Creek). This would reduce any confusion regarding naming conventions and comparisons of drainage areas. In addition, we recommend that the Accotink Village area be included in Fort Belvoir’s drainage study.</p>	<p>L5.164</p>
<p>We encourage the Army to discuss its role in the three Total Maximum Daily Loads for PCBs that are being developed (Accotink Creek, Dogue Creek and Pohick Creek).</p>	<p>L5.165</p>
<p>We support the application of LID techniques of stormwater management, particularly in areas where there are sensitive habitats that rely on a groundwater source (e.g., acidic seepage swamp communities).</p>	<p>L5.166</p>
<p>Section 4-7 of the DEIS identifies RPA impacts associated with Gunston Road improvements as follows: 4.8 acres, 2.7 acres, 4.9 acres, 2.7 acres, and 0 acres for the preferred, town center, city center, satellite campuses, and no action alternatives, respectively (even though page 4-65 identifies improvements to Gunston Road for the no action alternative). Why would there be differences among alternatives in these impacts?</p>	<p>L5.167</p>
<p>On page 4-282, the sentence “The most common type of prehistoric site identified at Fort Belvoir is the lithic artifact scatter, but no diagnostic tools or ceramics have been recovered from these sites (Goodwin & Associates, 2001)” is misleading. This sentence states that most lithic scatters cannot be dated, but could lead the reader to believe that there were no prehistoric sites with diagnostic artifacts discovered on the property.</p>	<p>L5.168</p>
<p>Page 4-287 references the 2001 Integrated Cultural Resources Management Plan as well as a program-specific programmatic agreement signed by Fort Belvoir and the Virginia State Historic Preservation Officer in 2003. Fort Belvoir should ensure that the BRAC actions will not be in conflict with these efforts.</p>	<p>L5.169</p>
<p>Page 4-288 mentions 47 archaeological reports and 16 architectural studies. A listing of these reports should be provided in the references or in an appendix.</p>	<p>L5.170</p>

Fort Belvoir BRAC DEIS
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L5.171

Page 4-288 references a 2006 historic resource survey and evaluation. Will this study be submitted to the State Historic Preservation Officer? Is there a timeframe for completion of the architectural surveys? How do the architectural surveys relate to BRAC?

L5.172

Page 4-288 references a 2006 comprehensive architectural survey at EPG. County staff is interested in obtaining a copy of this survey. Concern has been expressed recently by the Virginia Department of Historic Resources regarding the sufficiency of survey information that has been provided to consulting parties under the Section 106 process. Fort Belvoir should provide all consulting parties with the comprehensive architectural survey.

L5.173

Page 4-288 notes several survey and cultural resource documentation efforts that are planned for future implementation. Will these efforts be completed prior to 2011? Will the areas subject to these efforts be affected by the proposed BRAC actions?

L5.174

Page 4-289, Table 4.9-1 indicates the status of archaeological sites, but overall, this is a meaningless statistic, unless we know what the sites are.

L5.175

Table 4.9-3 on pages 4-293 through 4-295 does not reference National Register-eligible World War I era temporary warehouses. Have these warehouses been demolished?

L5.176

We commend Fort Belvoir for considering properties listed on the Fairfax County Inventory of Historic Sites as potentially eligible for purposes of Section 106 (page 4-296).

L5.177

Page 4-298 includes references to local historic districts. These should be listed here (and throughout this section of the EIS) as historic overlay districts in order to distinguish them from National Register historic districts.

L5.178

The description of potential effects of project #4 (the hospital) within Table 4.9-6 on page 4-301 should recognize the potential for adverse effects to the Friends Meeting House and Burial Ground.

L5.179

Page 4-302 of the DEIS notes that Fort Belvoir is in the process of developing a Programmatic Agreement for cultural resources. As a local government, Fairfax County is a consulting party by-right and requests to participate in the Section 106 process including the development of the Programmatic Agreement. In addition, the Fairfax County Park Authority wants to assist in or comment on the PA.

L5.180

The list of "General BMPs" to address cultural resources impacts of the preferred alternative (page 4-303) does not identify any actions to protect sites from construction noise/vibrations. Will any such actions be pursued?

Fort Belvoir BRAC DEIS
Comments from Fairfax County, Virginia—Additional Issues

On page 4-303, Section 4.9.2.3.2, the EIS should indicate that the Fairfax County Park Authority, Cultural Resource Management and Protection Section be included as a by-right consulting party on all Section 106 actions involving archaeological sites.

L5.
181

On page 4-304, the BMPs for potential adverse effects to architectural resources should address audible and atmospheric impacts. An additional measure could read: "Designing and locating new buildings, lighting and signage to minimize audible and atmospheric intrusion."

L5.
182

Page 4-304 discusses a number of measures that could be included in a programmatic agreement being developed between Fort Belvoir and a number of other entities. Several items on this list do not appear to be addressed in the draft of this document. Clarification is needed.

L5.
183

Table 4.9-11 (page 4-318) should identify the sites of concern.

L5.
184

We concur with the first two bullet items listed in the "General BMPs" section on page 4-320. Bullet Item 3 should indicate that the Virginia Department of Historic Resources must be notified and work stopped in an area if human remains are found. This is a stipulation of the Virginia Antiquities Act, Code of Virginia, Section 10.1-2305.

L5.
185

The analysis of the economic and social effects of the alternatives (beginning on page 4-332) would be easier to understand if definitions were provided for the terms used to categorize the impacts (i.e., short-term, long-term, minor, significant).

L5.
186

The discussion of aesthetic impacts on page 4-374 should identify whether or not the EPG development would be visible from I-95 and/or the Fairfax County Parkway.

L5.
187

On page 4-390, the DEIS states that it is Army policy that, beginning in FY 2008, all vertical building construction projects, with the exception of major hospitals, will achieve the silver level of certification under the U. S. Green Building Council's Leadership in Energy and Environmental Design (LEED) program. Major hospitals will be required to attain LEED certification with a goal of the silver rating. We commend the Army for this commitment and would encourage the Army to ensure that energy efficiency will be an integral component of the LEED certification efforts for all new facilities that will be constructed per this action.

L5.
188

Page 4-473 describes numerous trails through the South Post area. Without a map, it is difficult to understand how these trails are accessed and interrelated. A planned trails map should be included in the EIS in order to demonstrate how on-site facilities tie into the county's trail system.

L5.
189

There are many Major Regional Trail Systems planned by Fairfax County on the site and in the vicinity, such as the Potomac Heritage National Scenic Trail, the Interstate Route One Bikeway, the Fairfax County Parkway Trail and Cross County Trail. In addition, there are the Accotink Stream Valley Trail, the Pohick Stream Valley Trail, and major paved trails along Richmond

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Continued

Fort Belvoir BRAC DEIS
Comments from Fairfax County, Virginia—Additional Issues

L5.
189,
Continued

Highway, Telegraph Road and Mulligan Road. These trails are region-wide and countywide trails providing recreational as well as transportation opportunities. Any trail system relating to the BRAC actions should consider and incorporate these trails.

Trails should be provided consistent with the county's trails plan. Fort Belvoir should coordinate with Sheng Leu of the Department of Planning and Zoning (703-324-1380) regarding design, access and safety considerations.

L5.
190

The off-post project list, Table 5-2 on pages 5-11 and 5-12, is outdated and over-counts the acreage of several projects. For example, the Laurel Hill golf course expansion is listed as 348.6 acres, but the expansion acreage is 42 acres and has been completed. The entire golf course is only 250 acres including the expansion. Also, the Spring Hill Senior campus is listed twice (it should be 46.8 acres total rather than listed as two separate projects totaling 106.5 acres) and the South County High School has been built and opened in 2005. An updated list would be more accurate, and the list should be edited to include only proposed projects that would have an effect on traffic, schools, environment etc. For map number 185, the project reference number should be 05-IV-10S.

L5.
191

In Section 6, it would be useful to the reviewer to know for which section each of the preparers was responsible.

L5.
192

In Appendix D, the volumes in the diagrams are illegible—they are too small to read. The information on the CD is difficult to read as well.

In Appendix D, volumes are missing for the Fairfax County Parkway extension through EPG. When were the counts taken (which month)?

L5.
193

In Appendix L, Submitted Comments, we commented that "A statement should be included in the EIS that would require all Section 106 archeological work (scopes of work and reports) be coordinated with the Fairfax County Park Authority. It is a requirement under Section 106 that consultation be made with all interested parties, of which the Park Authority is the prime one regarding archeology." As a certified local government, we are consulting parties in the Section 106 process by-right. This statement was not included in the text of the DEIS.

**Draft Environmental Impact Statement for Implementation of 2005 Base
Realignment and Closure (BRAC) Recommendations and Related Army Actions
at Fort Belvoir, Virginia
Comments from Fairfax County, Virginia**

Suggested Corrections/Items for Clarification

This attachment presents a compilation of comments relating to factual corrections and needs for clarification and/or elaboration. These comments were identified through a multi-agency review of the Draft Environmental Impact Statement. The following agencies participated in this review:

County Executive's Office (Fairfax County Environmental Coordinator)
Fairfax County Department of Housing and Community Development
Fairfax County Department of Planning and Zoning
Fairfax County Department of Public Works and Environmental Services
Fairfax County Department of Transportation
Fairfax County Health Department
Fairfax County Fire and Rescue Department
Fairfax County Park Authority
Fairfax County Police Department
Fairfax County Public Schools
Fairfax Water

In addition, the National Park Service provided comments that have been incorporated.

Draft Environmental Impact Statement for Implementation of 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia
Comments from Fairfax County, Virginia—Suggested Corrections/Items for Clarification

L5.
194

Figure 1-1 (page 1-2) incorrectly identifies the Franconia-Springfield Parkway as an Interstate Highway. This highway is not even limited access over its full course. Other limited access highways (e.g., the Dulles Toll and Access Roads, the George Washington Memorial Parkway, highways near the Pentagon) are also incorrectly identified as Interstate Highways.

L5.
195

It should be noted that the "Existing Land Use Designations" map (Figure 2-1 on page 2-5) incorrectly identifies much of the "Environmentally Sensitive" areas as being located in the "Administration and Education" land use category. Substantial areas within the eastern portion of the South Post area are, in fact, designated as "Environmentally Sensitive."

Figure 2-5 identifies "Training Ranges" as the "Existing Land Use Designation" for the EPG site in the current land use plan. Since the EPG site is not included in the Real Property Master Plan (as noted on page 2-3), this designation is inappropriate.

L5.
196

Page 3-3 indicates that the GSA site is 65 acres in size, while page 4-2 cites a figure of 70 acres. The discrepancy should be corrected.

L5.
197

There is an inconsistency between the text on page 3-3 and Figure 3-1 on page 3-4. There is a similar inconsistency between the text on page 3-11 and Figure 3-5 on page 3-10. The text indicates that, under the Town Center (or Satellite Campuses) alternative, the western half of EPG would be designated for a "Community" use. Figure 3-1 (and Figure 3-5) shows the entirety of the EPG property as being "Professional/Institutional."

L5.
198

A statement on page 4-1 indicates that "the footprints used for the major BRAC projects were shown in Figure 2-6." Figure 2-6 does not provide footprints of facilities. Rather, it is a small-scale dot map identifying the proposed general locations for projects.

L5.
199

The discussion of the Policy Plan on page 4-10 misses the Economic Development and Revitalization sections. There are ten functional elements, not eight.

L5.
200

Pages 4-11 and 4-12 confuse two community planning sectors with similar names. On page 4-11, Planning Sector S5 is identified as the "Fort Belvoir Community Planning Sector." This is actually the "Belvoir Community Planning Sector," not to be confused with Planning Sector LP4 (the Fort Belvoir Community Planning Sector). On page 4-12, the boundaries of the Fort Belvoir Community Planning Sector are described incorrectly. The sector is located in the Lower Potomac Planning District and is comprised almost entirely of the Main Post of Fort Belvoir, along with the Village of Accotink and a 107-acre area in the northeastern quadrant of the intersection of Richmond Highway and Telegraph Road. The similarly named "Belvoir Community Planning Sector" is located in the Springfield Planning District; this Planning Sector

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Continued

<p>includes the EPG site and all areas south of EPG between Rolling Road and I-95. EPG is also located within the Franconia-Springfield Area portion of the Area IV Plan; detailed Plan recommendations for EPG can be found in that portion of the Plan.</p>	L5.200, Continued
<p>Text in the first paragraph on page 4-12 refers to what the “county wishes to see.” This should be revised to correctly reference the Comprehensive Plan guidance.</p>	L5. 201
<p>The Comprehensive Plan guidance for Laurel Hill (found in the LP1 - Laurel Hill Community Planning Sector) has been amended, so more specific description could be incorporated on page 4-12.</p>	L5. 202
<p>The identification of a “conservation” zoning category in Figure 4.2-3 (page 4-13) is somewhat awkward, in that there is no separate zoning category dedicated to conservation (the Residential Conservation District allows residential development at a maximum density of one dwelling unit per five acres). Areas of Laurel Hill have been protected through the zoning process, but there are similar areas elsewhere on the map that have been similarly protected (e.g., a large EQC area in Island Creek). Also, the “Residential” vs. “Planned Housing” designations are confusing—the map seems to be trying to draw a distinction between conventional R districts and P districts (and there is a similar issue for “Commercial” and “Planned Commercial”) but it suggests a difference in use that is not evident.</p>	L5. 203
<p>Page 4-14 of the DEIS states that “Kingstowne is expected to burgeon over the next 4 years.” While the Town Center development is not complete, much of Kingstowne has already been constructed, including the residential component. It is not clear how much “burgeoning” is left to occur.</p>	L5. 204
<p>Page 4-15 states: “Much of the formal Lorton correctional facility area is zoned PDH as well.” While portions of Laurel Hill have PDH zoning, most of this land is zoned R-C.</p>	L5. 205
<p>The reference to “Kingstowne Center” on page 4-15 seems to be referencing both the Kingstowne development as a whole (6,300 residential units) and the Town Center component of it (four buildings). Clarification should be provided.</p>	L5. 206
<p>On page 4-16, the third bullet point under the objectives for the Lower Potomac Planning District is awkward—the Plan text in question reads: “Encourage the creation of additional parks, open space and recreation areas and acquisition of additional acreage in environmentally sensitive areas as part of the Environmental Quality Corridor program.”</p>	L5. 207
<p>In the Area Plans Review process, eight amendments (affecting 82 acres) to the Comprehensive Plan were adopted within the study area. The 372 acre figure presented on page 4-16 is incorrect.</p>	L5. 208

Fort Belvoir BRAC DEIS

Comments from Fairfax County, Virginia—Suggested Corrections/Items for Clarification

L5.
209

Would some of the projects described in the sentence that straddles pages 4-16 and 4-17 require site plan approval in addition to building permit approval?

L5.
210

Page 4-19 states that the preferred alternative would increase total development from nearly 11 million square feet of space to approximately 16 million square feet (plus 7 million more square feet of parking). However, the DEIS notes that there will be approximately 7 million square feet of new and renovated facilities for the BRAC actions. Are 2 million square feet of BRAC actions going to be located in space vacated by departing uses? If not, why would the future development area be only 16 million square feet instead of 18 million square feet?

L5.
211

The fourth paragraph in Section 4.2.3.2 on page 4-21 should reference the Town Center alternative rather than the preferred alternative.

L5.
212

Table 4.2-6 on page 4-27 provides acreage information for both "residential" and "troop" land use designations for each alternative. The term "residential" implies that all housing would be located in these areas, although it is clear that this is not the intent, because troop housing would not be a subset of "residential." "Family housing" would seem to be a better/clearer description if not all residential uses will fall within this category.

L5.
213

On page 4-52, the first full paragraph is duplicated.

L5.
214

In Table 4.3-8, the Fairfax County Parkway should be on the CLRP as 6 lanes through the EPG (Rolling Road to Fullerton/I-95 Newington interchange). The recently published CLRP brochure from COG does not show this project, however it is on the listing of conformity projects.

L5.
215

Pages 4-167 and 4-168 discuss aircraft noise. For clarification, it should be recognized that Fairfax County's Comprehensive Plan applies a 60 dB ADNL threshold—the Plan recommends against new residential zoning where projected noise levels will exceed this threshold.

L5.
216

Page 4-210 indicates that county water quality monitoring station locations are identified on Figure 4.7-3; these stations aren't identified on that figure.

L5.
217

Page 4-217 states: "The threshold where indicators of stream quality shift toward degraded water quality is around 25 to 30 percent impervious cover." It is our view that this threshold is a much lower amount of impervious cover—the county's 2001 Stream Protection Strategy Baseline Study states: "At levels of 10-20% imperviousness, stream quality becomes adversely impacted (Klein, 1979, Booth, 1991, Schueler et al., 1992, Booth et al., 1993, Booth and Jackson, 1994 and Boward et al., 1999)."

L5.
218

The reference to Figure 4.7-1 near the bottom of page 4-217 should probably be Figure 4.7-2.

L5.
219

Page 4-232 states: "Under current National Flood Insurance Program and Fairfax County zoning limitations, no permanent dwellings are permitted to be constructed within the 100-year

Continued

Fort Belvoir BRAC DEIS
Comments from Fairfax County, Virginia—Suggested Corrections/Items for Clarification

floodplain boundary, although roadways, athletic fields and similar facilities are generally permitted (USACE, 2003). This statement should be clarified, as Fairfax County's Comprehensive Plan does not support active recreational uses in floodplains (floodplains are components of the stream valley core of the EQC system). The Zoning Ordinance significantly limits uses within floodplains, including active recreational uses. County staff is available to provide project consultants with further guidance regarding the county's Floodplain Regulations.

L5.219,
continued

RPA impacts presented in Table 4.7-27 (page 4-256) are in conflict with the data presented in Table 4.8-11 (page 4-281). What are the actual impacts? They should be presented consistently among sections of the report.

L5.
220

The discussion of the EQC policy on page 4-257 is not presented accurately. The bulleted items are part of the stream valley EQC core and not in addition to it, and other non-stream valley areas augment the stream valley core based on ecological value.

L5.
221

Figure 4.8-1 (page 4-258) identifies an EQC only on the EPG site, suggesting that there are no EQCs on the Main Post. Quite clearly, there are extensive EQCs on the Main Post—they simply haven't been mapped as they have on EPG. There should be some sort of acknowledgement of this in the EIS.

L5.
222

Figure 4.8-1 on page 4-258 is titled "Sensitive Environmental Areas," yet it displays only a subset of sensitive environmental areas that exist on the post. For example, Resource Protection Areas are not shown. This figure should be provided with a more accurate title.

L5.
223

The distinction between the "Wildlife Refuge Area" and "Wildlife Management Area" designations on Figure 4.8-1 (page 4-258) are not clear, particularly in light of the patchwork nature of these areas as shown on the map and in light of the labeling that clearly indicates that some "wildlife management areas" (and other areas, for that matter) are located in wildlife refuges. Clarity is needed.

L5.
224

The Paciulli Simmons vegetative survey of EPG should be identified as one of the sources for Table 4.8-1 on page 4-259.

L5.
225

There is an omission from one of the headings in Table 4.8-3 (page 4-268). The middle column of the table should be headed "1993 Environmentally Sensitive Land Use designation changed to:"

L5.
226

Page 4-270 refers to "losses of habitat on the eastern half of the EPG and the southern extent of the South Post." The latter reference is in error, as no development is being proposed along the "southern extent" of the South Post; much of the development identified in Figure 2-7 would occur in the northern portion of the South Post. Was the intent to reference the southern portion of the proposed development area for the hospital?

L5.
227

L5.
228

Page 4-270 states: "No effects on sensitive or protected species from a change in land use designation would occur on EPG because all areas of EPG are available for some type of development under both the 1993 land use plan and the Preferred Alternative land use plan." The 1993 Real Property Master Plan did not cover the EPG site, and therefore this statement is inaccurate. Further, the Fairfax County Comprehensive Plan identifies the preservation of the Accotink Stream Valley EQC and other environmentally-sensitive areas as major planning objectives for the EPG site, so it is clear that large areas of the EPG property have not been considered by county policy to be "available for some type of development." The proposed land use designations as applied to EPG would be in conflict with the county's Comprehensive Plan.

L5.
229

On page 4-283 in the second paragraph, "During the War of 1812, it was devastated again by British forces" should read "During the Battle of the White House in the War of 1812, the White House, another Fairfax family property, and the remains of Belvoir were shelled by British forces."

L5.
230

On page 4-283 in the third paragraph: "The Society of Friends, or Quakers, was among these" should read "Members of the Society of Friends, or Quakers, were among these."

L5.
231

In the legend for Figure 4.9-1 on page 4-291, we suggest changing the wording from "Local Landmark" to "Local Historic Site."

L5.
232

Figure 4.9-1 (page 4-291) has several errors. Shiloh Baptist Church is not in the location shown; this is Lebanon. Shiloh is further southeast. The Taft Archaeological site, which is a National Register listed site located in Mason Neck State Park, may be within the region of influence and should be on the map. George Washington's Grist Mill is labeled as National Register-eligible; it is actually listed on the National Register. The WWI warehouses should be added to Ft. Belvoir.

L5.
233

On page 4-292 and in other places throughout the document, reference is made to "Historic District Overlays." This reference should be changed to "Historic Overlay Districts."

L5.
234

On page 4-292, in the last line of paragraph 3, insert the word "historic" between the words "or" and "overlay."

L5.
235

On page 4-294, in the second heading on the page, insert the word "historic" so it reads: "Woodlawn historic district and historic overlay district."

L5.
236

On page 4-294, in the "Designation status" for Grandview (Jacob Troth House), please add: Contributes to Fairfax County Woodlawn Historic Overlay District.

L5.
237

The Otis Tufton Mason House is placed in the incorrect section of Table 4.9-3 (page 4-295). It should be in the section under the heading "Woodlawn Historic District and Historic Overlay

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Continued

Fort Belvoir BRAC DEIS

Comments from Fairfax County, Virginia—Suggested Corrections/Items for Clarification

District.” The “designation status” summary for this site should add: “Contributes to Fairfax County Woodlawn Historic Overlay District.”	L5.237, Continued
On page 4-299, in the discussion of the Southwest Area, the DEIS states: “While training use of the areas could result in adverse effects to these sites, the Training designation would prevent development in these areas. Both of these would be beneficial effects.” This is incorrect. Adverse effects are not beneficial. We suggest deleting or revising the sentence “Both of these would be beneficial effects.”	L5. 238
On page 4-300, the DEIS states: “Long-term minor adverse effects could occur to historic properties as a result of some of the 20 proposed projects under the Preferred Alternative.” We find the statement misleading and object to the adjective “minor.”	L5. 239
On page 4-318, the Woodlawn Historic Overlay District should be included as a Cultural Resource within Table 4.9-11.	L5. 240
Table 4.10-7 on page 4-330 identifies minority and low income population figures for census tracts/block groups in the area. Census tract-block group 4316-2 is located within the EPG site (as shown on Figure 4.10-1 on page 4-331). There are no residences on the EPG property. Why, then, are data for minority and low income populations identified?	L5. 241
The population increase data presented in Table 4.10-12 on page 4-340 should be presented in terms of real numbers in addition to percentage change.	L5. 242
Page 4-359 states that the proposed land use plan change associated with the Satellite Campuses alternative would “reduce the number of acres designated as Outdoor Recreation.” The land use plan change would actually eliminate this category altogether and not just reduce acreage.	L5. 243
Page 4-386 (and other pages as well) incorrectly identifies the Norman M. Cole, Jr. Pollution Control Plant as the “Norman” M. Cole Pollution Control Plant.	L5. 244
Page 4-434 indicates that there are four hazardous waste management units within the proposed development areas of the EPG site, yet no such units are identified on the EPG site within Figure 4.13-1.	L5. 245
Many of the projects listed in Table 5-2 are located incorrectly in Figure 5-2, including 29, 59, 143, 150, 151, 152, 153, and 185.	L5. 246
Page 5-13 states that “there exists a considerable amount of undeveloped acreage in the planned community” of Kingstowne. This is not correct. Much of the undeveloped acreage in the approximately 1,000 acre Kingstowne development contains open space areas that have been protected through agreements reached during the zoning process. The residential component of Kingstowne is largely built-out, and there should not be an implication that large areas of	L5. 247

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Continued

Fort Belvoir BRAC DEIS
Comments from Fairfax County, Virginia—Suggested Corrections/Items for Clarification

L5.247,
continued

Kingstowne remain to be developed. However, there are existing zoning approvals for approximately 500,000 square feet of unbuilt office space in the approximately 175 acre Kingstowne Towne Center and the developer is seeking zoning approval to increase that to 1.2 million square feet in four buildings.

L5.
248

On page 5-13, the reference to a “future transit station area” at I-95 and South Van Dorn Street is confusing. This is the Van Dorn Transit Station Area, which is planned for high-density office, hotel and residential use.

L5.
249

Page 5-13 categorizes the Springfield District contribution to cumulative land use impacts as negligible. Does this account for the proposed re-development of the Springfield Mall and the Midtown Springfield project? These would add approximately 2,800 residential units and 3.5 million square feet of office, hotel and retail development to the district.

L5.
250

Please include the following references in Section 8.0:

Federal Highway Administration, *Potomac Heritage National Scenic Trail Alignment Study: Fairfax County, Virginia: Final Report*, (Sterling, Vir.: Federal Highways Administration Eastern Lands Highway Division, 2004)

Metropolitan Washington Council of Governments, *Priorities 2000: Metropolitan Washington Greenways* (Washington, D.C.: National Capital Region Transportation Planning Board, MWCOG, 2001)

Northern Virginia Regional Commission, *Implementation Plan for the Potomac Heritage National Scenic Trail in Fairfax County* (Annandale, Vir.: Northern Virginia Regional Commission, 2002)

LG



FAIRFAX COUNTY
PUBLIC SCHOOLS

Jack D. Dale, Superintendent
8115 Gatehouse Road
Falls Church, Virginia 22042

April 27, 2007

Colonel Brian W. Lauritzen, Commander
U.S. Army Garrison Fort Belvoir
c/o Mr. Patrick McLaughlin
Fort Belvoir Directorate of Public Works
Environmental and Natural Resources Division
Building 1442
9430 Jackson Loop
Fort Belvoir, VA 22060

Dear Colonel Lauritzen:

On behalf of Fairfax County Public Schools (FCPS) and members of the Fairfax County School Board, thank you for the opportunity to comment on the impending Base Realignment and Closures (BRAC) action that will impact Fort Belvoir and the surrounding areas of Fairfax County. Although FCPS participated in the Draft Environmental Impact Statement (DEIS) review process and incorporated our concerns in a letter from Fairfax County Executive, Anthony H. Griffin, along with many other Fairfax County agencies, the magnitude of potential impact on school facilities warrants additional comments to highlight our concerns in the context of planning and budgeting for an influx of more than 3,000 students in a short time frame.

Section 4, Table 4.10-13 of the DEIS indicates that a total redistribution of 4,340 children could be anticipated, primarily in southern Fairfax County, of which 3,258 are projected to be school-aged children. The DEIS specifically states that *"these estimated population increases from the BRAC action translate into minor population increases over the current population projections"* and that school districts *"are already planning on how to accommodate the projected 2010 population."*

There are four high school pyramids that could potentially be impacted within the identified Region of Influence (ROI): Hayfield, Lee, South County and Mount Vernon. The adopted 2008-2012 Capital Improvement Program (CIP) that provides capacity projections for the 2011-12 school year indicates that, for these four school pyramids, there will be a cumulative capacity deficit of 1,381 spaces at the elementary school level and a capacity surplus of 1,022 and 104 spaces at the high and middle school levels respectively. The CIP projections do *not* include the impact of 22,000 new employees relocating to Fort Belvoir and the Army's projected impact of more than 3,000 school-aged children within Fairfax County. We do not agree with the DEIS statement that the anticipated increases in student population is minor, especially when the largest proportion will be elementary students where a significant capacity deficit is currently projected at the elementary school level in southern Fairfax County.

With the 2008-2012 CIP, the annual funding limit imposed by the Board of Supervisors was increased from \$130 million to \$155 million which allows FCPS to meet funding schedules for new construction and renovation and maintain and operate 184 general education and 26 special education facilities. The current CIP includes \$2 million in funds specifically designated for BRAC planning. Based on the school-aged population projections provided in the DEIS and assuming that all would attend public school, FCPS is expected to absorb an influx of 3,258 new students. This influx would require the equivalent capacity of 1.95 elementary school buildings, 0.4 middle school building, and 0.4 high school building. Adjusting this need

LG.1

Colonel Brian W. Lauritzen
Page 2
April 27, 2007

against the existing capacity available in the ROI eliminates the high school need and reduces the middle school need to 0.32 new middle school building. The need for 1.95 elementary school buildings remains and exacerbates the substantial existing elementary school capacity deficit projected for elementary schools in southern Fairfax County.

The adjusted facility cost of 0.32 additional middle and 1.95 elementary school facilities, after using all available capacity, is \$77.1 million. Given that the potential influx of more than 3,000 school-aged children as reported in the DEIS was only recently made public, the current facilities planning and CIP budget do not provide for the additional capacity required to accommodate the impact of BRAC.

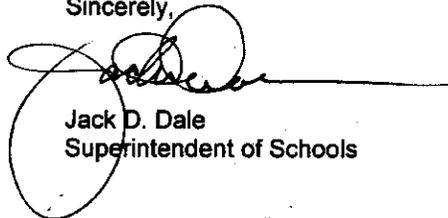
On the matter of addressing school impacts, the DEIS concludes that:

"The Army would continue to confer with the potentially affected school districts on potential student increases that could occur under the preferred alternative. Advance notice would give the schools time to secure funding, add facilities and hire new teachers, as necessary. Although the local school districts receive additional funding for each military dependent attending public school, school districts would bear some of the costs for additional teachers and physical space, if needed."

The DEIS conclusion and reference to \$7 million to be dispensed to the Department of Defense for the most heavily impacted school districts falls far short of school facilities requirements that are likely to be generated by BRAC. Now that the Army has provided a projection for potential new school-aged children and the adjusted capacity requirements and costs have been identified, I hope that we can pursue additional discussions regarding the proportional share that the Army would be expected to bear as a result of BRAC action. In addition, the Record of Decision should identify the funding source and timely schedule of payments to address the projected influx of new students anticipated with BRAC action which I understand must be completed by September 15, 2011.

I encourage continued coordination between the project consultants and FCPS staff on resolution of our issues. Our points of contact are Dean Tistadt, chief operating officer (703-246-6950), and Gary Chevalier, director, Office of Facilities Planning Services (703-246-6920). Thank you for your attention and for your consideration of our concerns.

Sincerely,



Jack D. Dale
Superintendent of Schools

JDD/kv

cc: Fairfax County Board of Supervisors
Fairfax County School Board
Anthony H. Griffin, Fairfax County Executive
Dean A. Tistadt, Chief Operating Office, FCPS
Gary Chevalier, Director, Office of Facilities Planning Services, FCPS
Kevin Sneed, Director, Design and Construction, FCPS
James P. Zook, Director, Department of Planning and Zoning

From: John A. Magarelli [mailto:jmagarelli@wmata.com]
Sent: Monday, April 30, 2007 3:25 PM
To: environmental@belvoir.army.mil
Cc: Brian.Glenn@dot.gov; Fred W. Simms; James Hamre; Joel R. Washington; Nat Bottigheimer
Subject: DEIS-Base Realignment at Fort Belvoir

Hello: Thank you for the opportunity to provide input on the Draft EIS with respect to the implementation of BRAC at Fort Belvoir. WMATA offers the following comments:

1. As conceptual plans, WMATA concurs with the basic bus service proposals and preliminary costs as presented for Route 1 Fairfax County, western Fairfax County, and for a Franconia-Springfield shuttle service to the Main Post and EPG site. We would also encourage DoD to provide the intra-base circulator services proposed with timed transfers at strategic locations on base, or at a transit center, to connect with regional operator's services.

L7.1

2. The transit service plans for the different land use alternatives call for additional peak hour bus service serving Franconia-Springfield and Huntington Metro Stations and a shuttle service from F-S Station to/from the Main Post and EPG site. A shuttle service will not adequately take advantage of access to Metrorail at Franconia-Springfield Station. Significantly more capacity and reduced travel times will be needed to maximize transit mode share. Some capital investment will be necessary to improve facilities and service.

L7.2

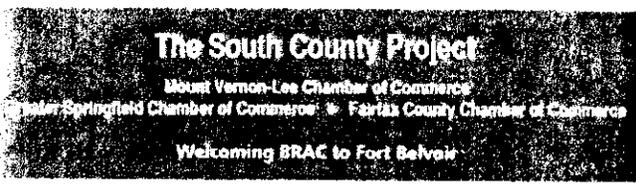
3. WMATA will have to further analyze the operational impacts of running additional bus service to each of these stations and determine the future bus bay capacity, along with the physical constraints, in conjunction with our own future needs. Please note that at Franconia-Springfield Station there is no excess capacity for future bus services unless additional bus bays are constructed. At Huntington Station, two bus bays are available only on the south (Kings Highway) side to accommodate future service expansion.

L7.3

Regards,

John

John A. Magarelli, P.E.
Senior Civil Engineer
Office of Planning and Project Development WMATA 600 5th Street, N.W.
Room 6F-13
Washington D.C. 20001
(202) 962-1357



Testimony for DEIS Public Hearing
 April 17, 2007 – John Pellegrin
 Mount Vernon High School

Good evening, I am John Pellegrin, the Greater Springfield Chamber of Commerce President-elect and a member of The South County Project Steering Committee.

The South County Project is an initiative of the Mount Vernon-Lee Chamber of Commerce, the Greater Springfield Chamber of Commerce and the Fairfax County Chamber of Commerce to engage the business community in the decisions that are part of the Ft. Belvoir BRAC process in order to advance the redevelopment of South County. We have no question that – if done well – the changes coming to Ft. Belvoir can have a profound and positive impact on our community. One priority to achieve this positive outcome is to support the development of the critical transportation infrastructure necessary to support the mobility needs of the expanded workforce in South County. Another priority for our collaborative is to see that we redevelop South County in a manner that protects our valued core services, such as our education system and public safety.

John Pellegrin

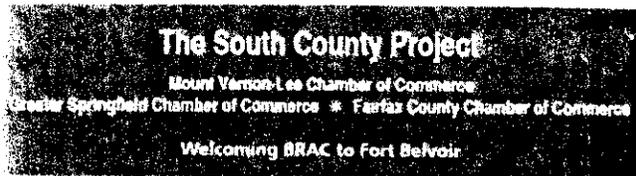
Sustaining our outstanding community begins with foresight. We must anticipate our future needs and plan accordingly. Today, that means understanding the growth which is coming, and growing differently to manage its challenges while maximizing its benefits. The South County Project is a good early step down that path. The tri-Chamber coalition applauds our local, state and federal officials for meeting with The South County Project Steering Committee over the winter months to discuss transportation funding needed for this installation to be successful.

The regional transportation debate has been at the forefront of most conversations in Northern Virginia and has a place of its own among the dialog surrounding this installation of BRAC. Fort Belvoir will experience a net gain of approximately 22,000 people which will have a great impact on the county's already fragile transportation infrastructure. It is imperative that the transportation improvements identified in the DEIS including improvements to the Fairfax County Parkway; access and egress to and from I-95 and the HOV/HOT lanes to the EPG and the main base; and improvements to the Richmond Highway corridor be the first priority for funding and construction. It is our view that the federal government should shoulder an appropriate burden in this regard.

L8.1

Similarly, additional emphasis must be placed on connecting the main base and the EPG to the region's mass transit network. The concentration of employment centers in compact areas – such as is recommended for EPG – provides the opportunity through shuttles and targeted improvements such as light rail or BRT to play a role in offering the new workforce alternatives to the automobile. Any amendments to the plan that would enhance connectivity to the Springfield Metro and VRE hub should also be considered and supported.

L8.2



In addition to the economic impact BRAC will bring to South County it is also important to recognize the other positive benefits forthcoming. The locating of the National Museum of the Army is one such benefit. The museum will add to the rich cluster of tourism destinations in the area and will make South County an even more attractive destination for visitors. The South County Project supports its location off the Parkway and Kingman Road as an appropriate location that balances accessibility with desirability. Likewise, the expansion of DeWitt Hospital will provide more medical care options for the many retired military that already live in proximity to Ft. Belvoir.

L8.3

Fairfax County as a whole has been extraordinarily smart and fortunate in its growth thus far. As we have grown from rural farm land to a prosperous suburb – from a bedroom community to the economic center of the region and the economic engine of the state – Fairfax County residents have reaped the rewards of the foresight of its past leaders. The issues being raised during this public review of the Draft Environmental Impact Statement are extraordinary and must be answered. However, these issues should not cloud the overall importance of this installation for South County's redevelopment and economic vitality.

L8.4

The South County Project looks forward to continued dialog with stakeholders and the insurance of a successful welcoming of this great opportunity. I again thank you for your time on this matter and urge you to follow the path of so many other successful communities toward implementing BRAC decisions.

MR. CARR: Next is John Pellegrin, to be followed by Sallie Lyons.

MR. PELLEGRIN: Good evening and thank you for the opportunity to speak to this very important issue affecting our community and region. My name is John Pellegrin. I'm President elect of the Greater Springfield Chamber of Commerce. As we know that Springfield sits right as the gateway to BRAC itself and the EPG, but I'm here to be a little bit more inclusive and that is the South County Project Steering Committee was formed among three chambers.

It's an initiative of the Mount Vernon Lee Chamber of Commerce, our chamber, Greater Springfield, and the Fairfax County Chamber of Commerce to engage the business community in the decisions that are part of the Fort Belvoir BRAC process, in order to advance the redevelopment of South County.

We have no question that if done well, the changes coming to Fort Belvoir can have a profound and positive impact on our community. One priority to achieve this positive outcome is to support the development of the critical transportation infrastructure necessary to support the mobility needs of the expanded work force in South County.

Another priority for our collaborative is to see that we redeveloped South County in a manner that protects our valued core services such as our education system and public safety. Sustaining our outstanding community begins with foresight.

We must anticipate our future needs and plan accordingly. Today that means understanding the growth, which is coming, and growing differently to manage its challenges while maximizing its benefits. The South County project is a good early step down that path.

The Tri-Chamber coalition applauds our local state and federal officials for meeting with the South County project steering committee over the winter months to discuss transportation funding needed for this installation to be successful, as well as other initiatives to bring it about.

The regional transportation debate has been at the forefront of most conversations in Northern Virginia, and has a place of its own among the dialogue surrounding this installation of BRAC. It will be a net gain of 22,000 people, great impact on the county's already fragile transportation infrastructure. It is imperative that the transportation improvements identified in the DIES, including improvements to the Fairfax County Parkway access and egress to, and from I-95 and the HOV, HOT lanes issue, an implementation of them, to both EPG and the main base.

Improvements to Richmond Highway Corridor must be a first priority for funding and construction. It is our view that the federal government should shoulder an appropriate burden in this regard, not just the county or the state. Similarly, additional emphasis must be placed on connecting the main base with EPG to the region's mass transit network.

L9.1

L9.2

continued

L9.2

continued

Opportunity to use shuttles targeted improvements such as light rail or BRT to enhance connectivity to the Springfield Metro and VRE hub should also be considered and supported.

In addition to the economic impact BRAC will bring to South County is also important to recognize the other positive benefits forth coming. Location of the National Museum of the Army, while not specifically part of BRAC, is to be commended and the citing seems to be appropriate, therefore, we support that. Likewise, the expansion of DeWitt hospital will provide more medical care options for the many retired military who already live in proximity to Fort Belvoir, particularly to the south of Fort Belvoir.

L9.3

Fairfax County as a whole has been extremely smart and fortunate in its growth thus far, as we have grown from a rural farmland to a prosperous suburb, from bedroom community to the economic center of the region, and the economic engine of the state. Fairfax County residents have reaped the rewards of the foresight of its past leaders.

L9.4

The issues being raised during the public review of the draft EIS are extraordinary, must be answered. However, these issues should not cloud the overall importance of the installation for South County redevelopment and economic vitality. The South County project looks forward to continued dialogue with the stakeholders and the insurance of the successful welcoming to this great opportunity. I again thank you for the opportunity to address these issues on behalf of our communities, thank you.

L10



City of Alexandria, Virginia

301 King Street, Suite 2300

Alexandria, Virginia 22314



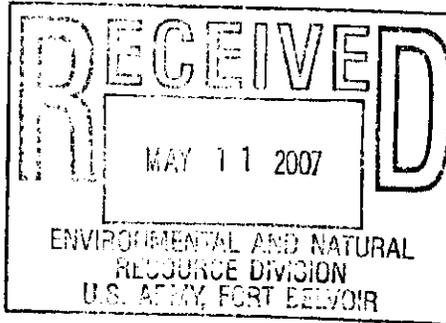
William D. Euille
Mayor

City Hall (703) 838-4500

Home (703) 836-2680

Fax (703) 838-6433

alexvamayor@aol.com



May 1, 2007

Fort Belvoir Directorate of Public Works
Attn: EIS Comments
9430 Jackson Loop, Suite 100
Fort Belvoir, Virginia 22060-5116

Re: Draft Environmental Impact Statement (DEIS) for Implementation of 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia

Dear Sir or Madam:

As Mayor of the City of Alexandria, I am pleased to submit and reaffirm the attached comments on the Draft Environmental Impact Statement (DEIS) for Implementation of 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia. These comments were initially submitted by Richard J. Baier, Director of Transportation and Environmental Services.

We appreciate the opportunity to comment on the draft document and look forward to your responses.

Sincerely,

William D. Euille
Mayor

cc: James K. Hartmann, City Manager
Richard J. Baier, P.E., Director
Department of Transportation and Environmental Services

"Home Town of George Washington and Robert E. Lee"

Comment Form

Environmental Impact Statement for Implementation of 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia

NOTE: All information submitted will become public record.

1. **Your information:**

Name: William D. Euille
Title: Mayor
Agency/Organization: City of Alexandria
Address: 301 King Street, Suite 2300
City, State, Zip: Alexandria, VA 22314
Phone: 703-838-4500
E-mail: alexvamayor@aol.com

Please send a CD copy of the Final EIS to me.

2. **Please check the one affiliation that best represents your role or interest in the EIS:**

- | | |
|---|---|
| <input type="checkbox"/> Fort Belvoir Resident | <input type="checkbox"/> Recreational Organization |
| <input type="checkbox"/> State Government | <input type="checkbox"/> Private Citizen |
| <input type="checkbox"/> School/University | <input type="checkbox"/> Federal Government |
| <input type="checkbox"/> Civic Organization | <input type="checkbox"/> Business/Commercial Organization |
| <input type="checkbox"/> Federally Recognized Tribe | <input type="checkbox"/> Environmental Organization |
| <input type="checkbox"/> County | <input checked="" type="checkbox"/> Other <u>Local Government</u> |

3. **EIS Areas of Concern. Please check the appropriate boxes and write your specific comments about the area of concern in # 4 below. More Comment Forms are provided at the Written Comments table if you need additional space.**

- | | |
|---|--|
| <input type="checkbox"/> Construction | <input type="checkbox"/> Noise |
| <input checked="" type="checkbox"/> Traffic and Transportation | <input type="checkbox"/> Native American Resources |
| <input type="checkbox"/> Cultural Resources/Historic Properties | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Socioeconomics | <input type="checkbox"/> Water Quality |
| <input type="checkbox"/> Wetlands, Wildlife, Endangered Species | <input type="checkbox"/> Other: _____ |

(More comment sheets are available if you need additional space.)

comments

Comment from Mr. Rich Baier, Director, Transportation and Environmental Services, City of Alexandria, VA

The following comments on the Draft Environmental Impact Statement (DEIS) for Implementation of 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia are submitted on behalf of the City of Alexandria, Virginia. These comments primarily relate to the transportation analysis section of the DEIS.

1. Overall, the city is disappointed that the transportation analysis and impact mitigation recommendations do not appear to include specific commitments by the Army or Department of Defense (DOD) to fund and/or implement any off-site mitigation actions. The statement on page 4-137 - "Funding mechanisms to pay for improvements needed for the BRAC action would be commensurate within the legal authority of the Army, likely through the Defense Access Road Program" does not reflect this commitment nor does it offer assurance that the recommended mitigation actions will be taken.

L10.1

2. Located just north of the transportation analysis study area, the city is concerned that the transportation study area is too limited. While acknowledging the study findings that increases in traffic demand fall off to less than 10 per cent within three to five miles from the base, the city also notes that in a congested area such as the Washington, DC region where major travel corridors experience recurring low levels of service, a ten per cent increase in demand may result in a significant increases in delay. While a 10 per cent threshold may be quite appropriate in areas with less recurring congestion, it is believed to be too high for conditions that exist in the DC region.

L10.2

3. The study assumes that 50 per cent of the realigned civilian workers will relocate to housing locations consistent with the existing base population prior to 2011. The study also notes that since most of these employees now live within a one hour commute of the base, the time frame for this shift to occur is 10 to 15 years. The city feels that additional justification of the 50 per cent relocation assumption must be provided as this has the effect of shifting up to 11,000 trips per day from routes approaching the base from the north to routes approaching from the south. This difference may be significant to areas north of the base.

L10.3

4. Page 4-87 notes that for the preferred alternative, the analysis indicated that even with programmed improvements, the morning and evening periods of congestion would be extended by 30 to 45 minutes. This may significantly impact areas adjacent to primary travel corridors by encouraging greater numbers of commuters seek alternative routes not intended to serve commuter traffic. This potential impact does not appear to be considered in the analyses.

L10.4

5. The study projects that only one to two per cent of base employees will use transit to travel to and from the base. In light of the significant changes in base activities, infrastructure and employment, the Army and DOD should take full advantage of its opportunity to develop base land use and transportation management plans that can be reasonably expected to significantly increase this transit mode share, and commit to developing the transit infrastructure and services necessary to support a much higher level of transit use. Statements such as "the Army could appoint a Transportation Demand Management Coordinator" and "a comprehensive TMP program is expected" do not reflect the commitment necessary to make these possibilities realities.

L10.5

The following are Prince William County's comments on the Draft Environmental Impact Statement for Implementation of 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia:

- We concur with others that have stated a need to reevaluate the dismissal of the GSA warehouse site as an option for redevelopment. Given its proximity to Metro service and Fairfax County's plans for redevelopment of the Springfield area, location of some of the new facilities/personnel would serve to support the County's goals and take full advantage of transit opportunities and lessen the traffic impact of the BRAC implementation.

L11.1

- With regard to traffic impacts, the draft EIS assumes that no impact will be felt outside of a 3 to 5 mile radius of the base. The premise appears to be that traffic is already heavily congested, it is anticipated to be heavily congested without BRAC, and therefore the additional congestion caused by BRAC will go unnoticed – "disappear into the regional traffic flow." We disagree and from the statements in the draft EIS regarding future relocation of employees, we believe that Prince William County and other points south of the base will "receive" some of these relocated employees, causing an increase in traffic along the already congested Route 1 and I-95 corridors.

L11.2

- The draft EIS also appears to assume that the spaces in Northern Virginia that will be vacated (i.e. Crystal City, Reston and Bethesda office space) will not be backfilled with new employers and their employees. Given the strength of the regional economy and projected employment figures, it is foolish to presume that this space will lay vacant, or that it will only be filled at the expense of other office space in the region. This space will be filled, and those employees will be on our regional roadways.

L11.3

- The draft EIS appears to develop a baseline of transportation projects that will be completed regardless of BRAC implementation, and presumes that all of those will be in place prior to, or at the same time, as implementation. The list includes projects that are currently unfunded or insufficiently funded. Presuming that those will all be in place is misleading, at best.

L11.4

- In addition to the baseline of transportation projects, the draft EIS includes a list of transportation improvements to mitigate BRAC impacts. The only project located within Prince William County is the expansion of transit service from points south to both the main base and EPG. The draft EIS includes a cost estimate of \$12 million. There is no reference, however, to the source of that estimate, whether that includes capital and/or operating costs, how many years of service that covers, and what the source of funding might be.

L11.5

- The draft EIS mentions trying to meet a 5% or 10% mode split with transit, but only identifies minimal services from the south to reach these high assumptions. It also assumes a TDM plan that encompasses the hiring just one TDM coordinator to complete large scale commuter programs identified within the report.

L11.6

- The same list of transportation improvements that will mitigate the impacts does not include any road projects south of the Occoquan River and does not mention the needed widening /

L11.7

reconstruction of the Route 1 Bridge over the Occoquan to mitigate current and future demand caused by the bases expansion.

- The draft EIS does not attempt to estimate the spin-off impacts of the BRAC relocation. A large portion of Prince William County is within the desirable "15 mile" radius of the base, and we anticipate an influx of contractors and support services. None of the impacts of these "followers" are included in the EIS.

L11.8

- The draft EIS includes many statements of "minor adverse impact" without defining minor or, for that matter, major impacts.

L11.9

MR. CARR: Next speaker up is Gerald Lyons, to be followed by Gerald Musarra.

MR. LYONS: Good evening. I'm Gerald Lyons. I'm a Mason Neck resident of 25 years and I'm here tonight to speak on behalf of the Mason Neck Citizen's Association, MNCA. The association represents Mason Neck residence and homeowners associations, including those Old Cochester, Gunston Road, Belmont Boulevard, Harley Road, Mason's Collar, Gunston Manner, and Halloween Point.

We had prepared more supporting detailed comments and many, many more questions based on our thorough analysis of the DEIS that we will submit in writing, in response to the DEIS during the public comment period.

Mason Neck is situated in the Mount Vernon district and is the southern most point in Fairfax County. We are bordered by the Potomac River and its tributaries, Route 1, and Fort Belvoir. There are only two entry and exit points from Mason Neck, accessible only from Route 1. Our environment on Mason Neck is one surrounded by the same waters fed by the drainage from Fort Belvoir. Most of our land is refuge, park lands, a truly magnificent historic plantation, an institution such as Bureau of Land Management that are all dedicated to the protection of our environment in many ways.

We citizens of Mason Neck have grown to share the responsibility for our treasures our institutional neighbors. This sort of protective drive makes it sensitive to the impact potential processes introduced into our environmental neighborhood. With that kind of background, we will express our concerns about water quality, air quality, traffic congestion, history preservation, and wildlife contravisit, by commenting on the contents of the DEIS.

We acknowledge the intense task being thrust upon governments and organizations involved. The association also acknowledges that the issues being addressed in the draft Environmental Impact Statement are so complex and so voluminous that it is difficult for residents to grasp everything upon reading documents in libraries and trying to download long documents.

L 12.1

Therefore, we strongly recommend that a stakeholder group be established to meet regularly and often to review and understand each issue that pertains to the neighboring communities affected by the changes. We propose a partnership that includes the local associations, churches businesses that may be impacted by decisions made as a result of BRAC at Fort Belvoir.

This tediant arrangement should reduce the adverse affects on the neighboring residents while improving decision making process. This process should not end tonight. We are concerned about the schedule and the funding.

Initially, some -- concerns, transportation, the impact of traffic is a major concern for our residents since Route 1 is our only access route. Even roads construction will have a major impact and we should be stakeholders in planning such changes.

L 12.2

Cultural and natural resources, because NVCA advocates for the preservation and protection of cultural and natural resources on our peninsula. We strongly encourage the highest standards of resource management be used. Safety, any and all action under consideration must take in account the personal safety of all residents during, before, and after implementation.

L12.3

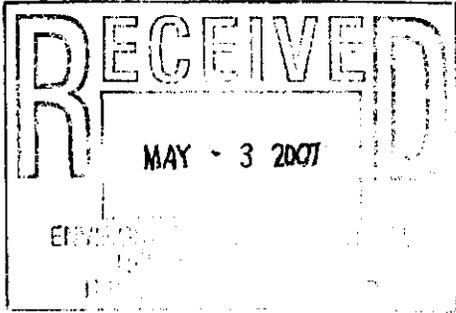
L12.4

In summary, we believe that the (off mike) analyses and the DEIS are of extraordinary value to the community at large and to the implementation of BRAC at Fort Belvoir, especially those addressing economic impacts and transportation impacts.

We'll only emphasize here, once again, that a need of an EIS with important transportation implications to reach beyond minimum NEPA requirements. We thank you for the opportunity to talk to you tonight.

L13

**ALEXANDRIA MONTHLY MEETING
OF THE RELIGIOUS SOCIETY OF FRIENDS
AT WOODLAWN
April 30, 2007**



Patrick McLaughlin
Fort Belvoir Directorate of Public Works
Environmental and Natural Resources Division
Building 1442
9430 Jackson Loop
Fort Belvoir, VA 22060-5116

Dear Mr. McLaughlin,

I write on behalf of the Alexandria Monthly Meeting of the Religious Society of Friends at Woodlawn (Woodlawn Friends Meeting) to provide our comments on the Draft Environmental Impact Statement (DEIS) for the implementation of the Base Realignment and Closure (BRAC) Commission's recommendations for Fort Belvoir.

Woodlawn Friends are grateful for this opportunity to respond and also for the attention given to the Woodlawn Meeting in the DEIS itself. We are gratified to see our historic property identified for consideration as the BRAC action moves forward.

In commenting on the DEIS, we would first note an error that requires correction. Throughout the document, Alexandria (Woodlawn) Friends Meetinghouse and Burial Ground are designated as a contributing resource in the National Register-eligible Woodlawn Historic District and the Fairfax County Woodlawn Overlay District. While this is true, as of September 2006, the Woodlawn Friends Meetinghouse became individually eligible for listing on the state and national registers of historic places, by action of the Virginia Department of Historic Resources. Included is a copy of their letter of notification to us. Commander Brian Lauritzen's February 9, 2007, letter and documents to initiate the Section 106 process for BRAC accurately designate us as individually NR-eligible. All information throughout the DEIS should be corrected to state our NR-eligible status accurately.

L13.1

Also, the DEIS historical overview given in 4.9.1.1., as derived from the Goodwin and Associates 2001 study, is imprecise. Information provided in 2006 to Fort Belvoir ENRD in the form of the PIF prepared by Woodlawn Friends can serve as a more complete and accurate historical reference.

L13.2

The DEIS presents many statements of potential and expected adverse effect to historical properties, including Woodlawn Friends Meetinghouse and Burial

L13.3

Ground, under the various alternatives for BRAC. Because so many variables and conditions are yet to be determined, Friends think that detailed responses are not meaningful at this point. The DEIS does not present complete information, so much as alternative possibilities, for BRAC action and resulting effects to historic properties. We note that the April 4, 2007, letter from Marc Holma, representing the Virginia DHR, speaks to our view of the situation.

L13.3
continued

At this time, therefore, we would comment on BRAC and the DEIS by identifying the aspects which we are most concerned will adversely affect Woodlawn Friends Meeting.

We request that the following be subject to extensive documentation and discussion during the Section 106 consultation, as to mitigation for any potential adverse affect on our historic property:

- All factors of the proposed new Access Road/Control Point (Project 15) opposite Pence Gate
- Increase in traffic on Route One
- Any change to access to our property from Woodlawn Road
- Any construction or development within our view shed
- Cumulative increase in noise levels, from
 - increased traffic
 - the new control point construction and subsequent gate activity
 - the National Museum of the United States Army activities
 - changes in Belvoir land use designations
- Presence of ordnance near our property
- Privatization of Belvoir utilities, as Woodlawn Friends Meeting's utilities are provided through Fort Belvoir connections, by long-standing agreement

L13.4

Friends also strongly request that the National Museum of the United States Army not be located at the Pence Gate alternative site. We still favor its location at the EPG site.

L13.5

Within the limits of information provided by the DEIS, Woodlawn Friends at present favor the City Center Alternative.

Friends question the inclusion of the revised land use plan as part of the DEIS, and comment that it would be better pursued as a separate study with documented reasons for the changed land use designations.

Thank you for attention to our comments and concerns,



Judy Riggan

Clerk, Community Developments Committee

Alexandria Monthly Meeting of the Society of Friends at Woodlawn



Copy

COMMONWEALTH of VIRGINIA

L. Preston Bryan, Jr.
Secretary of Natural Resources

Department of Historic Resources
2801 Kensington Avenue, Richmond, Virginia 23221

Kathleen S. Kilpatrick
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
TDD: (804) 367-2386
www.dhr.virginia.gov

September 8, 2006

Linda Spencer, Clerk
Woodlawn Friends Meeting
8990 Woodlawn Road
Fort Belvoir, VA 22060

Re: Woodlawn Quaker Meetinghouse, Fairfax County

Dear Ms. Spencer:

We are pleased to inform you, that at its September 6, 2006 meeting, the State Review Board concurred with the Department of Historic Resources (DHR) that **Woodlawn Quaker Meetinghouse** is recommended eligible for nomination to the national and state registers assuming that a more substantially documented nomination fully supports the arguments presented in the PIF and/or raised in the staff and board discussions. Approval at the Preliminary Information Form level is not the formal listing stage and not a guarantee that the nomination will succeed if the documentation and argument made in the final formal nomination do not fully support the property's eligibility.

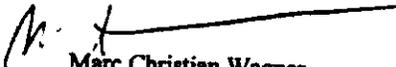
We caution you that if the staff or boards do not feel that a sufficient argument has been made for a resource, we may ask for more information or make the recommendation that the resource no longer appears to meet the criteria for eligibility. We strongly encourage you to work closely with the DHR staff as you work through the nomination process. Please feel free to contact the Northern Region Preservation Office at 540-868-7030 for any assistance.

The recommendation of eligibility is also subject to re-evaluation if the architectural and/or archaeological resource is significantly altered, remodeled, or partially demolished, or if further research reveals that the resource is less significant than originally proposed.

Before making a final recommendation on the resource, the DHR staff, the State Review Board, and the Historic Resources Board will need to see a fully developed nomination. The National Register of Historic Places form is used for nominating resources both to the Virginia Landmarks Register and the National Register. You may prepare the nomination yourself or hire a consultant.

Should the preparation of a nomination go forward, you will be notified prior to any formal action by the Department. Thank you for your interest in the register program.

Sincerely,


Marc Christian Wagner
National and State Register Manager

cc: Ms. Judy Riggan

Administrative Services
10 Courthouse Avenue
Petersburg, VA 23803
Tel: (804) 863-1624
Fax: (804) 862-6196

Capital Region Office
2801 Kensington Ave.
Richmond, VA 23221
Tel: (804) 367-2323
Fax: (804) 367-2391

Tidewater Region Office
14415 Old Courthouse Way, 2nd Floor
Newport News, VA 23608
Tel: (757) 886-2807
Fax: (757) 886-2808

Roanoke Region Office
1030 Penmar Ave., SE
Roanoke, VA 24013
Tel: (540) 857-7585
Fax: (540) 857-7588

Northern Region Office
5357 Main Street
PO Box 519
Stephens City, VA 22655
Tel: (540) 868-7031
Fax: (540) 868-7033

L14

Patrick Solomon**Subject:** FW: Submission of Belvoir BRAC EIS Comments (Audubon Society of No VA)**From:** Gbooth123@aol.com [mailto:Gbooth123@aol.com]**Sent:** Tuesday, May 01, 2007 12:37 PM**To:** environmental@belvoir.army.mil**Subject:** Submission of Belvoir EIS Comments

For Patrick McLaughlin, comments of the Audubon Society of Northern Virginia on the Fort Belvoir DEIS. We look forward to your response.

Glenda Booth

**COMMENTS OF THE AUDUBON SOCIETY OF NORTHERN VIRGINIA
on the Draft Environmental Impact Statement for the Realignment of Fort Belvoir,
Virginia
May 1, 2007**

Glenda C. Booth, Vice-President
gbooth123@aol.com
Telephone: 703-765-5233

Introduction

On behalf of the more than 4,000 members of the Audubon Society of Northern Virginia (ASNV), I present these comments on the March 2007 Draft Environmental Impact Statement (DEIS) for the Implementation of the 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia.

The Audubon Society of Northern Virginia applauds Fort Belvoir for being stewards of the Accotink Bay and Jackson Abbott Wildlife Refuges. These and other areas of Fort Belvoir have some of the richest wetlands in the county, extensive tracts of woodland, riparian and shoreline habitat and some of the region's most valuable natural areas.

ASNV has had a longstanding interest in the Fort Belvoir installation. Our chapter commented in 2003 on the land use plan and on the BRAC scoping document in 2006. Our members have conducted bird and other surveys on Belvoir properties.

Department-wide, DOD owns 25 million acres in the United States, an area the size of Kentucky, lands and waters that have become accidental homes for a wide range of wildlife. DOD properties are home to 600 rare plants and animals, including 20 percent of all federally-listed species, more than can be found in our national parks, according to *On Earth* magazine, summer 2006.

The Fairfax County Context

It is our understanding that the Army plans to move 22,000 jobs to Fairfax County by 2011, accompanied by an unknown number of contractors and related businesses. Putting 22,000 new federal jobs in Fairfax County is like dropping the equivalent of the Pentagon into Fairfax County. This is a massive move with massive impacts.

It is important to understand the local natural resource context of this decision-making.

- *Unhealthy streams:* In 2005, 70 percent of the county's streams were in fair to poor condition. By 2006, that was up to 80 percent, according to county studies.
- *Unhealthy river:* The Potomac River got a C+ for its health in 2006 (Interstate Commission on the Potomac River.)
- *Unhealthy Bay:* The Chesapeake Bay got a grade of D+ for 2006, by the Chesapeake Bay Program.
- *Unhealthy air:* Fairfax County does not meet federal ozone and particulate air quality standards.
- *Trees lost:* The county's tree cover has plummeted from 75 percent in the 1970s to 40 percent today, according to the Fairfax County Urban Forestry Division. American Forests recommends that suburban residential zones have at least 50 percent tree cover because tree cover is directly related to environmental quality and a sound "green infrastructure."
- *Wetlands lost:* Wetlands act as sponges, absorbing flood waters and filtering pollutants. Virginia has lost almost half its wetlands, destroyed by development and other activities. In Fairfax County's, wetlands constitute less than half of one percent of the county.
- *Sprawl spoils:* Sprawl and impervious surfaces expand inexorably and destroy resources, fragment habitat and send pollutants to our waters.
- *Little left:* Fairfax County is reaching "buildout." Parks and natural areas constitute only 15 percent of the county.

Overall Process

We have several over-arching concerns about the BRAC process.

First, there is no real coordination with local or state governments in terms of planning for land use, transportation, schools, air quality, watershed protection, police and fire services or other issues. The EIS on page 4-344 says that the Army "would confer" with Fairfax County. Conferring is not coordinating. We urge true coordination and compliance with all county and state environmental requirements.

(L14.1)

For example, Fairfax County is now preparing watershed plans for all of its 30 watersheds. These plans present an excellent opportunity to coordinate your development plans with the county.

Second, the EIS at several points mentions the need for funds and estimates costs, but we are not aware of a firm commitment of funds from the DOD or the federal government or an intention to request funds from the U. S. Congress. According to Congressman James Moran on April 17, the DOD budget, includes no funds for transportation associated with BRAC. The absence of a commitment of sufficient federal funds is particularly disturbing in light of the exemption of DOD's properties from local real estate taxes and the demands that DOD activities place on local and state governments.

(L14.2)

Third, we believe that the deadline of 2011 is totally unrealistic and that it should be extended substantially, if this development project moves forward.

Fourth, while the draft EIS suggests that the basis for this proposal is the need to strengthen the security of military operations, in light of the events of September 11, 2001, we suggest that to move military jobs without adequate planning, on a weak or questionable assumption, and without adequate planning and assured funds, is hasty and irresponsible.

(L14.3)

"Minor Adverse Impacts"

Throughout the draft EIS, impacts are described as "minor" -- impacts on air quality, water quality, traffic congestion and police, fire and social services, for example. For example, the EIS predicts a 10 percent increase in stormwater discharge in nine watersheds. We believe a 10 percent increase in stormwater discharge is not minor, especially in an area that already has seriously degraded streams.

L14.4

The EIS seriously understates and minimizes impacts. It is unclear how the DOD reached the conclusion that there would be "minor" impacts for any of the alternatives. How is DOD defining "adverse" and "beneficial" impacts?

We note that 90 percent of the impacts described are adverse, leaving 10 percent as "beneficial." How can a community be expected to accept and fund the federal imposition of this kind of massive development when 90 percent of the impacts, as described by the DOD, are adverse?

We believe that the draft EIS makes some assumptions without a basis, a "rosy scenario" approach. For example, on page ES-13, it says, "Over time, services (police, fire, medical, schools, social services) *would adapt* (italics ours) to the demands of the increased population base, funded by *new tax revenues*" (italics ours) and on page 4-361, it states "services would *adapt*." We ask how will they "adapt"? Where will they come from? What will make them "adapt"? Who will "adapt" them?

L14.5

What level of government has assured funding or new taxes for these new services? Where will the "new tax revenues" come from? This kind of language is pure, generalized speculation, diminishes DOD's responsibility, provides no guarantees and has no place in an EIS.

We are disturbed by the absence of an analysis of the additional contractors and related firms and their impact that will no doubt relocate to the Belvoir area if the BRAC actions occur. These associated impacts also will be substantial and the EIS is incomplete without an analysis or data. The public is poorly served without a complete assessment.

L14.6

Mitigation

On page 4-271, there is a list of best management practices "that the Army *can consider* (italics ours) to reduce the impacts of the Preferred Alternative." It is not clear that this is a list of appropriate or adequate mitigation measures. In fact, on the same page and on page ES 21, it states, "No specific mitigation measures are identified."

If this plan proceeds, as part of mitigation, we recommend that all native trees and all wetlands that are impacted be mitigated two to one and monitored for success for at least five years.

L14.7

We recommend, if this BRAC action proceeds, that the Army use low-impact development techniques for controlling stormwater runoff, build only "green," LEEDS-certified buildings, use Energy Star and the best energy and water-conserving appliances and facilities, low polluting vehicles, permeable pavements, natural landscaping and native plants.

We strongly urge a commitment to specific funding and specific mitigation plans before moving forward, before the record of decision is signed, before any construction is begun and before any jobs are moved.

Land Use Plan "Redesignations"

The plan proposes to reduce the current 12 designations to seven. We are very troubled by

L14.8

the inclusion of land use redesignations in this EIS and question what connection they have to BRAC.

The current "Environmentally Sensitive" designation would be eliminated. Areas currently designated as Environmentally Sensitive or Outdoor Recreation under the 1993 land use plan (p 4-267) could be used for purposes incompatible with natural resources conservation, uses such as range/training, institutional, residential, airfield, retail stores, clubs and town centers.

The EIS does not demonstrate why this redesignation is driven by BRAC. We strongly urge its deletion.

Similarly we object to the construction of a family camp on Accotink Bay. Camps, especially those for recreational vehicles, will create more impervious surfaces, and a camp in general will create more pollution, more noise and more waste next to one of Northern Virginia's premier wetlands, an area used by many raptors, wading and other birds and other wildlife and very close to the Accotink Bay Wildlife Refuge. This area has played and continues to play an important role in the regional recover of the bald eagle from endangered status.

Water Quality

The EIS finds on page 4-217 that seven sub-watersheds already exceed the 25 percent impervious threshold for clean streams (Stream quality shifts toward degraded water quality when impervious cover exceeds 25 percent, according to the Center for Watershed Protection.)

We have two concerns: The EIS proposes no mitigation (page ES-21). It says that "a potential mitigation measure would be to develop a stormwater drainage system master plan study." To repeat: a study. A study is not a funded plan. A study is not mitigation.

Second, the EIS proposes no clear coordination with Fairfax County as the county develops extensive watershed plans to comply with the 2010 Clean Water Act and Chesapeake Bay deadlines.

L14.9

Transportation

We underscore the concerns of U. S. Senators John Warner and James Webb, Congressmen James Moran and Tom Davis, Virginia Transportation Secretary Pierce Homer, Supervisors Gerry Hyland and Dana Kaufman, Board of Supervisors' Chairman Gerry Connolly, and Delegate Vivian Watts, as expressed at your April 17 meeting.

It is incomprehensible why the EIS assumes on page 4-456 that 90 to 95 percent of employees will drive vehicles to work. In an area that is the third most congested in the country, where commuters waste hours in congestion every day, where the major air pollutants are from vehicle emissions, any credible plan should assume that the majority of employees will use public transportation to and from work - transit, rail, Virginia Railway Express, buses, and shuttles to the Metro subway stations. Belvoir should propose and fund a concrete plan so the vast majority of employees will have suitable alternatives to driving vehicles to work. Smart Growth principles should be planned and followed, if this development proceeds.

L14.10

Adding thousands more vehicles to the roads will no doubt create more pollution from vehicle emissions in the Fort Belvoir, Mount Vernon and Springfield areas. The EIS dodges this issue by presenting a "regional" analysis, purporting to show that spreading out current jobs all over the region will in fact reduce emissions. The EIS should focus on the

L14.11

immediate area of Fort Belvoir's properties, seriously examine and describe the impact of added vehicles on air quality in this immediate area. More vehicles, more idling and more congestion will not doubt create more air pollution.

Another concern is the wide disparity in the cost estimate for transportation projects needed to support the BRAC expansion. The estimate in the EIS is \$458 million (page ES-8). Fairfax County has estimated a need of \$1.3 billion, well over twice the DOD estimate. The final EIS should provide a real estimate and explain its basis.

L14.12

The suggestion that Belvoir "could appoint a Transportation Demand Coordinator" (pages ES-20 and 4-456) is a start, but only a minimal start. Without appropriate public transportation infrastructure, a transportation coordinator would have limited options and effectiveness.

L14.13

Unexploded Ordinance and Hazardous Waste

We are troubled by the discussion of unexploded ordinance and hazardous waste on pages 4-365 and 4-420 and the discussion of PCBs on page 4-426. Prominently absent is a schedule or deadline for cleaning these up. The final EIS should have a clear, specific, funded plan with a schedule and realistic deadlines for cleanup.

L14.14

Birds and Other Wildlife

Birds are the "canary in the coal mine" for our environment. Their health, abundance and distribution can signal trends in the health of the larger environment.

The Audubon Society of Northern Virginia has a long history of documenting bird life in our community and promoting conservation actions to conserve birds and other wildlife. Without habitat, we would have no birds.

First, consider this context:

- Eleven percent or 1,111 of the world's species of birds are at risk; 200 could disappear within 20 years (Bird Life International 2000). The primary threat to birds is habitat loss and fragmentation. ASNV's recent book, *Birds in Northern Virginia*, documents the regional situation and substantiates negative trends in abundance and distribution of many birds, particularly those that depend on quality natural habitat. Northern Virginia's native birds are most impacted by the alteration or elimination of natural areas.

- Fort Belvoir, with its diverse habitats, is home to many native bird species, including resident and migratory waterfowl, raptors, wading birds and numerous neotropical migrants that are in notable decline.

- The EIS says that on the Main Post, there are at least 275 documented species (page 4-262).

- Accotink Bay is a critical site for bald eagle nesting and foraging (the site where the EIS proposes to construct a family camp, page 4-270).

L14.15

This EIS, under all alternatives, further destroys and fragments habitat, introduces non-native species, all threats to birds, in an area where there is little natural habitat left.

The analysis of the BRAC actions on birds and other wildlife is very deficient, lacking in current data.

For the preferred alternative, concentrating development on the Engineering Proving Grounds (EPG), there is no real data of impacts on birds in the draft EIS.

We have two points:

- (1) The EIS cites Fairfax Audubon Society (now the Audubon Society of Northern Virginia) data from *nearby areas*, not from the EPG itself.
- (2) The data used is eight years old.

The description appears to be speculative and presumptive. Wording such as the nearby habitats "*appear to provide good habitat*" for grassland birds; "*probably provide good habitat for bird species favoring rest interior habitat,*" (4-262); "*some of the best habitat in the region for species favoring coniferous forests.*" These are not definitive data nor are these specific conclusions.

Questions:

- Where is the survey data?
- When were the surveys done?
- What are the findings?

Silent on Buffers

The draft EIS makes no commitment to creating or maintaining natural buffers around the Preferred Alternative. At the 2006 scoping meeting, we asked Army officials about plans for buffers and provided information on the Army Compatible Use Buffer (ACUB) program. The Army already has mechanisms to create buffers. Officials at that meeting were unaware of the ACUB program.

The draft EIS appears to ignore our suggestions. We again urge the creation of buffers for whatever development you undertake or alternative you choose, if you proceed.

Conclusions

The draft EIS fails to realistically convey the serious, multiple and negative impacts of the Army's proposed development projects. Terms like "realignment," do not begin to capture the consequences for our community, the massive transportation, environmental, socioeconomic, public service and other burdens and disruptions that this plan would create.

The draft EIS notes very few beneficial impacts and understates and misrepresents adverse impacts throughout with words like "minor" and "marginal."

Some of the most disturbing elements are the following:

- the redesignation of current land uses;
- the elimination of the environmentally sensitive designation;
- the absence of real, funded mitigation plans;
- the absence of real funding for transportation and other impacts;
- the absence of meaningful coordination (beyond "conferring") with Fairfax County and Virginia;
- the inadequate analysis of wildlife impacts based on recent, concrete survey data;
- and
- the absence of a real commitment to a sustainable environment in an already seriously stressed area.

(1/4.16)

The issue for the Audubon Society of Northern Virginia is not *no* development, it is *sustainable* development, with Fort Belvoir, the Department of the Army and the Department of Defense committed to acting as a good neighbor and responsible steward of the public's natural resources. Unfortunately, this environmental impact statement and these alternatives give very little hope that our and the public's expectations will be met.

See what's free at AOL.com.

MR. CARR: Next speaker is Glenda Booth, and she will be followed by C. Flip Web, if you'll move down to the mic.

MS. BOOTH: I'm Glenda Booth. I'm here tonight representing the Audubon Society of Northern Virginia. We have 3,500 members in the area that are very concerned about the EIS and about this process.

But thank you very much for having this opportunity for public involvement, and I especially want to thank you for the Accotink Bay Wildlife Refuge, because it represents one of the richest and bio-diverse areas in Northern Virginia, a premier natural area. I want to give a little context to this discussion. Fairfax County already faces some very serious problems. Eighty percent of our streams are in fair to poor condition already.

The Potomac River got a grade of C plus, our air quality we don't meet, ozone, particulate standards, we've lost many, many wetlands, less than half of one percent of the county is wetlands, and impervious surfaces continue to expand further degrading our streams, and our county tree cover has plummeted from 75 percent to 40 percent today, which is well below what is recommended for a suburban area.

In terms of this process, we believe that it is -- and I know that it was established by Congress, and so my comments are in part directed at the Congress, but I think that it is really egregious that the BRAC process does not seriously coordinate with local land use plans, local water shed plans, local transportation plans, and schools.

L15.1

The fact that the federal government can bring into a community such a massive development without true coordination with a local jurisdiction, I think is appalling. Another concern is the lack of funds, as others have described, and the 2011 deadline, I believe or we believe, is very unrealistic.

Next subject, "minor adverse impacts;" riddled throughout this document is that there are minor impacts on air quality, minor traffic congestion, minor impacts on police, fire, and social services. Ninety percent of the impacts in this document are adverse; very few are described as beneficial.

L15.2

We believe that many sections of it are a rosy scenario. For example, it says that local services would "adapt," it says that they would be funded by new tax revenues, but no where does it identify how these "adaptions" will take place or where these revenues would come from.

In terms of water quality, the document says there will be a ten percent increase in storm water discharge in nine water sheds and seven of the sub water sheds already exceed the 25 percent impervious threshold for a healthy stream. We believe that ten percent is not minor. We are disappointed that there's no mitigation proposed except a study, and there's no coordination that we can see with Fairfax County's water shed plans.

L15.3

A really serious flaw in this document is mitigation. Massive impacts, as others have described, impacts on natural resources, but no real commitment to mitigation.

L15.4

There's a list of potential mitigation projects, but those are only potential and we couldn't find any commitment of funds. So we agree that specific funding and mitigation plans should be a condition of moving forward before the record of decision.

We're very disturbed by the land use "re-designations" by the elimination of the environmentally sensitive category. We are very perplexed by that. We don't see what this has to do with BRAC, and so we hope that that does not go forward. We agree with the comments that there will be more congestion and thus, more pollution in our air from vehicle emissions.

L15.5

We agree with others that the EIS is deficient in not analyzing the contractors that will relocate to the area. We cannot understand why in the transportation sections it assumes

L15.6

90 to 95 percent of the people will drive. We should be starting with majority of people taking mass transit and public transportation as others have explained.

L15.7

The document says there's unexploded ordnance and hazardous wastes at EPG, but there's no schedule or deadline for cleaning it up, and then in terms of birds, we believe that Audubon is especially concerned about birds because they are the canary in the coal mine, and in terms of indicating the health of our environment, we believe that the analysis and the data are very inadequate.

L15.8

You have used some data that Fairfax Audubon collected, which is eight years old, so it's hard to even analyze your analysis when the data is so old. We have asked you to look into the ACUB Program for buffers.

L15.9

In conclusion, I know my time is up, we believe that this document is very inadequate, that it's very troubling in re-designating the environmentally sensitive areas, that there should be clear, specific, and funded mitigation plans, there should be a commitment to coordinate with Fairfax County's rules, and a commitment to a sustainable environment and to an area that is already very seriously stressed. Thank you very much.

L15.10

MR. CARR: Thank you. Our next speaker is Mr. Web and he will be followed by John Sperling from Springfield, if you'll move to the next mic.

MR. WEB: Hello, my name is Flip Web. I am the Co-Chairman of the Fairfax County Federation of Citizen's Associations Environmental Committee. In that capacity, I am submitting a resolution on BRAC that was adopted by the membership back in October, it focuses mainly on transportation issues. My comments will be focusing on general conforming.

My comments concern the draft, a general conformity to termination for implementation of 2005 BRAC recommendations for realignment Army actions in Fort Belvoir, Virginia. My comments are my own and not those of the employer, Fairfax County Federation of Citizen's Association. My detailed comments will be coming separately. I was going to have them attached, but I need to work on them a little bit, I just finished working them at 5:00 this afternoon.

My comments can be summed up and the project should not be allowed to go forward due to serious deficiencies and general conformity determination. The applicable general conformity regulation 40CFR in '93, subpart B, it's a different regulation than was cited in the document, states no department agency or instrumentality of the federal government shall engage in support in any way or provide financial assistance for licenses or permit or approve any activity which does not conform with the applicable implementation plan.

L16.1

Since the Washington Metropolitan area has been designated as non-attainment for the eight hour ozone and annual pm2.5, National Ambient Air Quality Standards, there are no SIP's that have been approved for these pollutants by EPA, and the estimated emissions are above the dominemous (sic?) [de minimus?] emission thresholds for precursors of both of these standards. Therefore, the project cannot go forward without the provisions of 40CFR '93, subpart B, being strictly adhered.

Specific deficiencies are explained in more detail in my detailed comments, but deficiencies amount to the emissions of all criteria pollutants, carbonate monoxide, nitrogen dioxide, sulfur dioxide, pm10, pm2.5, lead, and in my opinion, also ozone must be modeled to prove the project will not "cause or contribute to any new violation of any standard or increase the frequency of severity of any existing violation of any standard in any area."

Emissions did not include many indirect emission sources from the point -- including, for instance, contractors or electrical usage. The emissions have not been offset by contemporaneous reductions in emissions at other sources in the non-attainment area. There are required certifications that must be made by COG and the Governor of Virginia were not included. These deficiencies could have been addressed if the emission budgets had been included in the eight hour ozone SIP, currently going through public comment. But the Army did not participate in the process.

The only way to resolve the issues now and continue the project would be to fully offset the anticipated emissions increases by purchasing emission reduction credits, which I do not believe exists in the Washington Metropolitan area.

The model in resulting emissions ensure that no National Ambient Air Quality Standards will be exceeded in surrounding community. Even though there are no readily

available emission reductions, credits in the non- attainment area, the Army may be able to satisfy the requirements of reducing mobile sources of emission possibly subsidizing mass transit, i.e., providing funds fermata or VRE to encourage mass transit. Thank you very much.

L16.1
continued

MR. CARR: Frank; Frank will be followed by Mark Gionet.

MR. COHN: My name is Frank Cohn and I'm the Chair of the Transportation Committee of the Mount Vernon Council of Citizen's Association. I have a prepared statement and (off mike). I did not get the coordination effected with the whole council because of time constraints, so it is just the Transportation Committee that I'm representing at this time.

We like the EIS's statement about the appointment of an immediate -- of a transportation demand management coordinator, and we suggest that he be appointed immediately, regardless of the alternatives that are to be selected. We're already behind schedule if we're talking about 2011 for any new projects, and -- oh, sorry, thanks. And we suggest that Fairfax County be requested to appoint a 131 counterpart to this coordinator.

The coordinator should be involved in setting priorities and determining funding resources. In other words, who will pay for what? We think that's going to be a big struggle all the way down the line. The funding, even if all of the amounts that the EIS indicates, if all that funding is allocated, it still will represent an immediate and a long range short fall in what will be needed in funding.

There are added projects which need to be funded. The Fairfax County Federation of Citizen Associations passed a resolution of 20 additional projects, and that was supported by a resolution by the Mount Vernon Council, which recommended priorities and funding sources.

L17.1

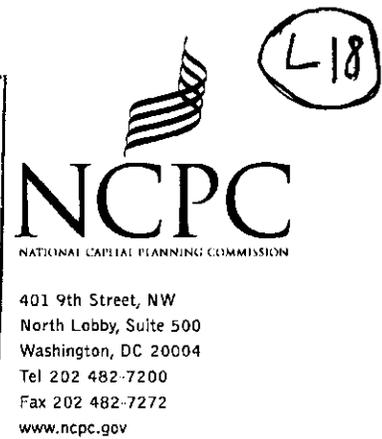
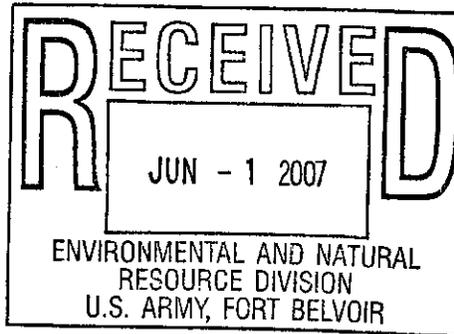
All of these are needed to have a successful area of transportation plan. The coordinator must address congestion from the Beltway to the Occoquin. The EIS statement that congestion will disappear three to five miles from Fort Belvoir, we do not believe in that.

If you look at the traffic congestion that you have presently and you don't even know in the rush hour which way the rush hour is going because it's going both ways, any added traffic to that is going to be a real, real problem, and that goes for all of Route 1, from the Beltway to the Occoquin.

L17.2

Lastly, mass transit requirements; the EIS has stated no plans exist for Metro expansion of either blue or yellow lines. That is a red flag. We must do something about it. There is a transit study that has been authorized, and that transit study ought to be expedited. The legislature had provided funding for there already. The coordinator that you are suggesting ought to be in close contact with this study group. Thank you very much.

L17.3



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MAY 04 2007

Mr. Patrick McLaughlin,
Fort Belvoir Directorate of Public Works, Environmental and Natural Resources
Division, Building 1442
9430 Jackson Loop
Fort Belvoir, Virginia, 22060-5116

Dear Mr. McLaughlin:

Thank you for the opportunity to participate in the review of the Draft Environmental Impact Statement (DEIS) for the Implementation of Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia. The DEIS is being prepared, as a federal regulation requirement, in response to accomplishing evaluation of the potential environmental and socioeconomic impacts of two proposals at Fort Belvoir: update of the land use plan of the post's real property master plan (RPMP) and implementation of base realignment as directed in the November 9, 2005, Presidential Commission recommendations approved by the President, which became law and now must be implemented as provided for in the Defense Base Closure and Realignment Act of 1990 (Public Law 101-510), as amended, and in accordance with the National Environmental Policy Act (NEPA).

The DEIS comments that are provided below are focused to the Commission's role as the central planning agency for the federal government in the National Capital Region and express our general views on adequacy of the environmental evaluation and its potential planning effects to federal interest originating from the perspective of the unique planning authority of the NCPC. With the above as background, my comments on the document address several issues about the DEIS evaluation.

The information in the DEIS regarding the identified preferred alternative clearly specifies adverse impacts the Nation's Capital transportation network in the southern portions of the National Capital Region (NCR). The preferred alternative along with three other alternative planning scenarios and the no action alternative have been reviewed within the DEIS information. Accommodation of personnel being realigned to Fort Belvoir took into account the needs of six major groups slated for realignment by the BRAC Commission. The six groups and the number of personnel (staff and contractors) to be realigned include:

Mr. Patrick McLaughlin

Page 2

- Washington Headquarters Services (WHS)—9,263 personnel
- National Geospatial-Intelligence Agency (NGA) —8,500 personnel
- Army Lease—2,720 personnel
- U.S. Medical Command (MEDCOM) —2,069 personnel
- Program Executive Office, Enterprise Info Systems (PEO EIS) —480 personnel
- Missile Defense Agency, HQ Command Center (MDA) —292 personnel

These six groups total 23,324 personnel. The personnel being realigned from Fort Belvoir to other installations result in a net increase at Fort Belvoir of approximately 22,000 personnel.

I note with concern, however, that the BRAC action is expected to have significant effects on the transportation highway system adjacent to Fort Belvoir, regardless of the land use alternative selected. Unquestionably the region's transportation system is already strained under existing traffic volumes (2006 conditions) as demonstrated in the DEIS, and it will continue to be constrained under the anticipated growth of the whole region of Northern Virginia. Through the analyses of the four alternative land use plans, a series of transportation improvements have been identified to mitigate the effects of each of the alternatives. These improvements would be needed to maintain the transportation system's operational performance at an acceptable level of service and delay. Order-of-magnitude costs for the traffic mitigation actions are estimated to be \$458 million for the preferred alternative, and are recommended by the NCPC staff to be implemented by the Army in its Record of Decision (ROD), with highest priority for all within the Defense Access Road Program, and include commitment to fund transit components as well.

For the preferred alternative, the ability of transit to contribute to the mitigation of severe disruption and congestion is greater than for the other alternatives because it is one of two alternatives that are closer to the regional rail network. Its location makes it feasible to achieve the NCPC supported target of at least 10 percent transit mode share for employee usage at Fort Belvoir by no later than 2012. Furthermore, bus service of a high quality to realize a 10 percent mode share for transit must complement the road network mitigation actions and be committed to in the ROD to reduce congestion and limit vehicle delays. The DEIS identifies five basic bus service areas, and examines general routes and service concepts to achieve a 5 or 10 percent mode share. The Commission staff notes that a 10 percent mode split would reduce by 725 the number of vehicles entering the post during peak hours. Again the staff strongly endorses and will anticipate a submission to NCPC, pursuant to National Capital Planning Act, the required Transportation Management Plan that establishes a 10 percent minimum goal. An additional consideration for the preferred alternative is that the needed transportation improvements can largely be constructed without interfering with existing traffic because the Engineering Proving Grounds (EPG) area of the alternative is largely undeveloped. Each of the other alternatives would require highway projects that will need to be constructed within active existing traffic zones and would further delay vehicle movements at critical links in the commuter road network that will also have its own ongoing planned improvements in essentially the same timeframe.

L18.1

Two other areas of the DEIS evaluation that NCPC has concern is in the information regarding proposed land use designations and in the document's review of biological impacts.

In regard to land use, the NCPC staff does not support the elimination of the designation of environmentally sensitive lands currently identified by the 1993 Commission approved plan.

The staff finds no justification for this land use modification beyond the DEIS citing the change allows flexibility for use functions, more area of developable acreage, and greater flexibility for future development without having to grapple with compatibility. Few and minor beneficial effects are estimated by the DEIS to emerge from preferred alteration of the land use title. The DEIS suggested designation as "community" indicates this category includes safety clearances, security areas, water areas, wetlands, conservation areas, resource protection areas (RPAs), forest stands, and former training areas. Plainly some of these proposed activities are incompatible when not fully accounted for by meaningful descriptors of land use. Moreover, this re-labeling fails to denote that many of these lands are important natural resource buffers that assist in sustaining the functions of water areas, wetlands, conservation areas, resource protection areas (RPAs), and forest stands of the National Capital Region. Additionally, these attributes are sensitive lands for which the importance of their existence and function is emphasized throughout the DEIS analysis in such findings as:

- The preferred alternative land use plan increases the post's available acreage for development by approximately 800 acres, some occurring within the previous environmentally sensitive land use areas.
- Proposed on-post non-BRAC projects and off-post non-army projects cumulative effects would further diminish the availability of forest and field habitats on and off the installation, and increase the possibility of occurrences of invasive species, edge effects on habitats, and habitat fragmentation.
- Long-term minor adverse effects on water resources would be expected from other on-post and off-post proposed development projects in the vicinity of Fort Belvoir that would potentially increase storm water runoff from paved surfaces and nonpoint source pollutants.

Furthermore, the NCPC staff does not agree with the DEIS conclusion and proponent's justification that "changes in land use plans do not define the extent of effects [to soils, topography, and other natural systems] that would result if the plan were implemented". Commission staff finds land use designations do define potential land use coverage and the degree of impervious surface possibly present within areas in question, and consequently its relative impact to soils, watersheds, water quality, and vegetative cover that is achieved by the land use plan as a whole.

This discrepancy is particularly important to water quality impacts and potential impact to the Potomac River. Surface water from Fort Belvoir drains directly to the Potomac River and to the lower reaches of three major Potomac River tributaries: Pohick Creek, Accotink Creek, and Dogue Creek. As noted by the DEIS, watershed modeling was used by the Army to assess potential cumulative effects on flow and pollutant loads affected by future development in the watersheds that drain Fort Belvoir. Further noted by the DEIS, in contrast to the land use designation noted above, is the indication and conclusion that "RPAs and riparian buffers also extend into areas

L18.2

L18.3

proposed for land use designation changes. Encroachment into these areas decreases the buffer between developed land and sensitive natural resources". The DEIS continues on to note the development and impervious surface cover results in potential changes in peak flows due to the preferred alternative. The storm events used to evaluate the impacts are described to correspond to the Commonwealth of Virginia's Erosion and Sediment Control Regulations. The threshold used to determine potential adverse effects for the analysis is indicated as a 10 percent increase in peak flow occurring from a 1-year, 24-hour and a 10-year, 24-hour storm event. As specified by the DEIS, nine subwatersheds were found to have greater than a 10 percent increase in peak flow during the 1-year storm event under the preferred alternative, with one subwatershed experiencing the highest percent increase (100 percent). Each of these same subwatersheds, except for one, would also experience at least a 10 percent increase in peak discharge during a 10-year, 24-hour storm event, indicating there would be a moderate to high increase in flood levels within these drainage areas.

Clearly the importance and need for the establishment of continued environmental sensitive land use description is required in the proposed land use plan modification for Fort Belvoir. It is unmistakable that the cumulative impact of the planned land use modification to the environment of the post and the region is measured in hundreds of acres of adverse impact to stream floodplains, tens of acres of important impacted and fragmented forested land, and scores of acres of significant and important Chesapeake Bay associated streamside areas. These results are further stipulated in the DEIS in its noting that approximately 86 acres of high-intensity and 262 acres of medium-intensity development would be added to the installation by implementing the preferred alternative and that impervious surfaces would substantially increase in subwatersheds 1 (119 percent), 3 (32 percent), 25 (75 percent), 53 (910 percent), 54 (352 percent), 55 (325 percent), 57 (285 percent), 58 (194 percent), and 59 (134 percent). The steady conversion of undeveloped land to impervious surface is an ongoing risk to the region's streamside forests and wetlands. Development densities that result in amplified stormwater run-off volumes produce erosion, adverse nutrient loading, and added pollution problems for wetlands and lower watershed aquatic resources. Also, a loss of stream and forested habitat from the Potomac tributaries, combined with losses from other affected areas highlighted in the DEIS, demonstrates an overall significant impact that materially affects the regional biodiversity important to the Potomac River and the region as a whole.

Another area of the DEIS lacking analysis of effects and mitigation relates to the discussion of biological impacts specifically regarding submerged aquatic vegetation (SAV) located within the vicinity of Fort Belvoir shorelines. This omission is important in particular to shallow water SAV of the ecosystem of the Potomac River. Proposed Fort Belvoir BRAC construction nutrient loadings (total nitrogen and total phosphorus) under the preferred alternative are identified but the significance and effect to SAV is not discussed. This is disturbing in that five of the subwatersheds draining to the Potomac show nutrient magnitudes as described in the following table that appears in the DEIS: [Table 4.7 - shown]

L18.4

L18.5

**Subwatersheds with greater than 10-percent increase in TN and TP loads
under the Preferred Alternative**

Subwatershed number	Percent increase in TP	Percent Increase in TN	Affecting projects
53	51%	68%	NGA, Infrastructure
54	8%	17%	Infrastructure
55	26%	39%	Infrastructure
57	19%	31%	NGA, Infrastructure, CDC (NGA)
58	22%	33%	NGA, WHS, Infrastructure, Emergency Services Center (EPG)

Noticeably, under the heading of Biological Resources within the DEIS, there is no detailed discussion of the potential impact of any of the Fort Belvoir BRAC alternatives on SAV resources within the Potomac River and its tributaries. The importance and function of SAV to the river include:

- Generating food and habitat for waterfowl, fish, and invertebrates;
- Adding oxygen to the river water column during photosynthesis;
- Filtering and trapping sediment that otherwise would bury benthic organisms and cloud the water column;
- Inhibiting wave action that erodes shorelines; and
- Absorbing excess nutrients, such as nitrogen and phosphorus that may fuel the growth of unwanted algae in surrounding waters.

The significance of SAV impacts is sufficiently important to be discussed in the Fort Belvoir DEIS because of the potential increases in nutrient loading to the watersheds involving the Potomac River and the consequence to SAV. Specific criteria for cumulative significance and mitigation should also be explicitly identified and described for all impacted SAV resources.

Your consideration of our comments at this stage of the environmental review is most appreciated. Please place the Commission on the distribution list pertaining to all further environmental considerations of the 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia as they progress.

Sincerely,



Patricia E. Gallagher, AICP
Executive Director

L18.5
(cont.)

L18.6

P1

Comment Form

Environmental Impact Statement for Implementation of 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia

NOTE: All information submitted will become public record.

1. Your information:

Name: Eileen H. Hurley - dependent military retiree
 Title: _____
 Agency/Organization: _____
 Address: 9001 Cherrytree Dr.
 City, State, Zip: Alexandria VA 22309
 Phone: 703-799-9353
 E-mail: hurleyja@aol.com

Please send a CD copy of the Final EIS to me.

2. Please check the one affiliation that best represents your role or interest in the EIS:

- | | |
|---|---|
| <input type="checkbox"/> Fort Belvoir Resident <u>user</u> | <input type="checkbox"/> Recreational Organization |
| <input type="checkbox"/> State Government | <input checked="" type="checkbox"/> Private Citizen <u>+ retired federal employee</u> |
| <input type="checkbox"/> School/University | <input type="checkbox"/> Federal Government |
| <input type="checkbox"/> Civic Organization | <input type="checkbox"/> Business/Commercial Organization |
| <input type="checkbox"/> Federally Recognized Tribe | <input checked="" type="checkbox"/> Environmental Organization |
| <input type="checkbox"/> County | <input type="checkbox"/> Other: <u>neighboring property/home owner</u> |

3. EIS Areas of Concern. Please check the appropriate boxes and write your specific comments about the area of concern in # 4 below. More Comment Forms are provided at the Written Comments table if you need additional space.

- | | |
|--|--|
| <input type="checkbox"/> Construction | <input checked="" type="checkbox"/> Noise |
| <input checked="" type="checkbox"/> Traffic and Transportation | <input type="checkbox"/> Native American Resources |
| <input type="checkbox"/> Cultural Resources Historic Properties | <input checked="" type="checkbox"/> Air Quality |
| <input type="checkbox"/> Socioeconomics | <input checked="" type="checkbox"/> Water Quality |
| <input checked="" type="checkbox"/> Wetlands, Wildlife, Endangered Species | <input type="checkbox"/> Other: _____ |

(More comment sheets are available if you need additional space.)

4. Please write your comments in the space provided below.

PI.1

My husband and I chose to live in Mt. Vernon (Mt Vernon Forest) because of its natural beauty and balance of meadows and natural/nature plant and animal life.

I come here to ride and work with horses at Woodlawn Stables and appreciate the range of plant and wildlife (on land and air) afforded by this beautiful land on the Atlantic flyways in historic record.

PI.2

The noise and pollution (air/water) along RT. 935 between Mt Vernon Estates and Woodlawn has increased dramatically in the past 10 years - we live along the highway.

PI.3

The wetlands (and supported wildlife, etc.) are already in peril - Dogue Creek, Little Nantux Creek and tributaries, Accotink Creek, Peckick Bays - by the clear cut construction on South Post.

PI.4

I am a lover of nature and an historical boy education and related employment. I fear over-development is destroying environmentally and historic lands permanently. I am committed to saving our heritage and resources. I am a member of environmental ~~Web Site~~ and bird conservancy groups.

Comments may be submitted online at: www.BelvoirBRAC-EIS.net

E-mail: Comments may be e-mailed to: environmental@belvoir.army.mil

Mail: Comments may be mailed to:

Attn.: EIS Comments

Fort Belvoir Directorate of Public Works

9430 Jackson Loop, Suite 100

Fort Belvoir, VA 22060-5116

All comments must be received or postmarked by May 1, 2007 to be considered in preparation of the Final EIS.

(More comment sheets are available if you need additional space.)

Comment Form

Environmental Impact Statement for Implementation of
2005 Base Realignment and Closure (BRAC) Recommendations
and Related Army Actions at Fort Belvoir, Virginia

NOTE: All information submitted will become public record.

Your information:

Name: JOHN A. HURLEY
 Title: Brig. General, USAF-Ret
 Agency/Organization: HURLEY FAMILY
 Address: 9001 CHERRY TREE DRIVE
 City, State, Zip: ALEXANDRIA VA 22309
 Phone: 703 799 9353
 E-mail: hurleyja@aol.com

Please send a CD copy of the Final EIS to me.

Please check the one affiliation that best represents your role or interest in the EIS:

- Fort Belvoir ^{Facility user}
- State Government ^{as DoD retiree}
- School/University
- Civic Organization
- Federally Recognized Tribe
- County
- Retired ^{MILITARY}
- Recreational Organization
- Private Citizen
- Federal Government
- Business/Commercial Organization
- Environmental Organization
- Other: NEIGHBORING PROPERTY OWNER

EIS Areas of Concern. Please check the appropriate boxes and write your specific comments about the area of concern in #4 below. More Comment Forms are provided at the Written Comments table if you need additional space.

- Construction
- Traffic and Transportation
- Cultural Resources Historic Properties
- Socioeconomics
- Wetlands, Wildlife, Endangered Species
- Noise
- Native American Resources
- Air Quality
- Water Quality
- Other: _____

I am very concerned re the adverse impact upon the eagles nurtured by the Federal Wildlife Refuge at Mason Neck as their fly'g. range includes Fort Belvoir.

The closure by the Army of Woodlawn Road and the extensive tree cutting by the Army for the dense RCI residential construction has caused a risk to flora, fauna with particular regard to

(More comment sheets are available if you need additional space.)

Wildlife cont.

P2.1
continued

TRAFFIC

P2.2

Please write your comments in the space provided below.

Agave Creek,
Nojun Creek,

Wild life such as: Accokeek Creek
egles, hawks, owls,
deer, etc. and endangered Frogs
in the Pole Road area.

The addition of
A ~~group~~ 20,000 commuting
day workers to Fort

Belvoir will swamp a
gridlock -

- Route 95
- Route ONE
- Route 7100 (FC Pkwy)
- Route 235

Chit. Vernon Memorial Hwy
- George Washington
Memorial Parkway of
the National Park Service

All of the above are overloaded
now at commuting times.

Thank you for the opportunity to comment.

John A. Hung

Web Site

Comments may be submitted online at: www.BelvoirBRAC-EIS.net

E-mail: Comments may be e-mailed to: environmental@belvoir.army.mil

Mail: Comments may be mailed to:
Attn.: EIS Comments
Fort Belvoir Directorate of Public Works
9430 Jackson Loop, Suite 100
Fort Belvoir, VA 22060-5116

All comments must be received or postmarked by May 1, 2007 to
be considered in preparation of the Final EIS.

(More comment sheets are available if you need additional space.)

**Draft Environmental Impact Statement for Implementation of 2005 Base
Realignment and Closure (BRAC) Recommendations and Related Army Actions at
Fort Belvoir, Virginia**

**Comments in Behalf of the Mason Neck Citizens Association
17 April, 2007**

My name is Gerald Lyons. I am a Mason Neck resident of 25 years and am here tonight to speak on behalf of the Mason Neck Citizen's Association (MNCA). The Association represents Mason Neck residents and Home Owner's Associations, including those of Old Colchester, Gunston Road, Belmont Blvd., Harley Road, Mason's Collar, Gunston Manor, and Hallowing Point.

Mason Neck is situated in the Mount Vernon District and is the southern most point in Fairfax County. We are bordered by the Potomac River and its tributaries, Route 1, and Fort Belvoir. There are only two entry and exit points from Mason Neck -- accessible only from Route 1. Our environment on Mason Neck is one surrounded by the same waters fed by the drainage from Fort Belvoir. Most of our land is refuge, parklands, a truly magnificent historic plantation, and institutions such as BLM that are all dedicated to protection of our environment in many ways. We citizens of Mason Neck have grown to share the responsibility for our treasures with our institutional neighbors. This sort of protective drive makes us sensitive to the impact potential of processes introduced into our environmental neighborhood. With that kind of background, we will express our concerns about water quality, air quality, the chain reactions of environmental quality degradation generated by traffic congestion along corridors, historic preservation, and wildlife conservation, by commenting on the contents of the DEIS.

The MNCA acknowledges the intense task being thrust upon the governments and organizations involved. The Association also acknowledges that the issues being addressed in the Draft Environmental Impact Statement (DEIS) are so complex, information so plentiful, and reports so voluminous that it is difficult for residents to grasp everything upon reading documents in libraries and trying to download long documents. P 3.1 Therefore, we recommend strongly that a stakeholder group be established to meet regularly and often to review and understand each issue that pertains to the neighboring communities affected by the changes. We propose a partnership that includes the local associations, churches, and businesses that may be impacted by decisions made as result of BRAC at Fort Belvoir and its associated changes. This arrangement should reduce the adverse effects on the neighboring residents, while improving the decision-making process.

Additionally, based on our organization's review of the DEIS, we have the following primary concerns:

P3.2

1. Transportation: The impact of traffic is a major concern for our residents since Route 1 is our only access route. Even road construction has a major impact and we should be stakeholders in planning such changes and determining their timing. A great deal more public information and interaction is needed in all transportation decisions and construction.

P3.3

2. Cultural and Natural Resources: Because MNCA strongly advocates for the preservation and protection of cultural and natural resources on our peninsula, we strongly encourage that the highest standards of resource management be used. The Belvoir peninsula has a large number of cultural and natural resources and is physically and historically aligned with Mason Neck. Full identification of resources in the intended impact areas should be done and evaluations made based upon federal and state guidelines in efforts to mitigate any negative impact.

P3.4

3. Safety: Any and all actions under consideration must take into account the personal safety of all residents, before, during, and after implementation.

In summary, we believe that many of the analyses in the DEIS are of extraordinary value to the community at large and to the implementation of BRAC at Fort Belvoir, especially those addressing economic impacts and transportation impacts. We would only emphasize here once again, the need of an EIS with important transportation implications, to reach beyond minimum NEPA requirements - to examine and report impacts at a scale commiserate with realistic regional influence. Further to that, we must observe that although the transportation impacts of BRAC are of great political and popular importance, a more publicly quiet environmental advocacy in these neighborhoods surrounding Fort Belvoir would wish to see the assessments of biological impacts and water quality impacts taken to a higher, even restorative, level of mitigation, including funding proposals.

We have prepared more detailed comments based on a thorough analysis of the DEIS that we will submit, in writing, in response to the DEIS during the public comment period.

We thank you for the opportunity to address you tonight and look forward to a continued partnership with our Ft. Belvoir neighbor throughout the BRAC planning and implementation process.

Mason Neck Citizens Association
P.O. Box 612
Mason Neck, VA 22199
Info@MasonNeck.org

1. Paragraph 4.13.2.3 states that environmental and health risks will be controlled by implementing existing programs, policies, regulations, and standard operating procedures, and that harm to humans and the environment from hazardous substances and hazardous materials would be included in these requirements.

We express significant concern over the Army's ability to properly identify, handle and dispose of hazardous wastes resulting from building demolition, renovation or infrastructure improvements required to implement any action. The Draft Environmental Impact Statement (DEIS) discusses liquid PCBs but does not address solid PCBs which may be contained in numerous material applications throughout the facility, as the Army has historical knowledge of known applications where this type of contamination may be present. These applications include insulation and sound dampening materials; plastics, rubber materials and adhesive tape used in electrical cabling; paint formulations; fluorescent light ballasts; gaskets in HVAC and other duct systems; ceiling tiles; flooring and floor wax/sealants; roofing and siding materials; caulking and grout; waterproofing compounds, anti-fouling compounds and fire retardant coatings; and coal tar enamel coatings for steel water pipe and underground storage tanks. These applications should be assumed to be regulated unless proven otherwise by approved grab sampling procedures. In addition, electrical cables should also be assumed to contain friable asbestos unless proven otherwise by sampling or other verifiable means.

The DEIS incorrectly states that PCBs are regulated at concentrations greater than 50ppm. PCBs are regulated in concentrations greater than or equal to 50ppm.

2. The List of Preparers should have the respective Governmental Organization/Activity name or associated Company name listed for each individual.

3. The General Conformity Determination is incomplete as it only addresses construction activities and employee commutes to/from the facility but does not address emissions resulting from support contractors traveling to/from the facility, whether they are relocating to nearby office spaces or transiting from their current locations; does not support emissions resulting from supply, service, or support vehicles transiting to/from the facility; nor does it include the emissions occurring from transient activities such as employees traveling off the facility for lunch. These impacts are also required to be analyzed.

4. Utility mitigation measures are based upon Dominion Virginia Powers ability to upgrade its existing off-site capacity significantly. However, Dominion Virginia Power presently is predicting insufficient capacity to meet an anticipated 2011 electrical demand, and currently does not have approval for accomplishment of the infrastructure upgrade from the State Corporation Commission. The DEIS Utility mitigation measure is a significant adverse impact and poses an unacceptable risk of insufficient electrical capacity and rolling blackouts to the surrounding community resulting from the proposed action.

P4.5

5. The DEIS only addresses employee traffic impacts during peak commuting periods, but does not address the traffic impacts resulting from support contractors traveling to/from the facility whether they are relocating to nearby office spaces or transiting from their currently locations; from supply, service, or support vehicles transiting to/from the facility; nor does it address impacts resulting from transient trips such as employees traveling off the facility for lunch. These impacts are also required to be analyzed.

P4.6

6. Traffic mitigation measures are predicated on accomplishment of numerous projects beyond the Army's cognizance and control. We consider any action, other than the no action alternative, to be a significant adverse impact and unacceptable risk to the public until all projects upon which the mitigation measures are predicated are programmed, fully funded, and accomplished.

Commentor:

Gary Kitchen (Resident)
8842 Camfield Dr
Alexandria, VA 22308

P5

Comment Form

Environmental Impact Statement for Implementation of 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia

NOTE: All information submitted will become public record.

1. Your information:

Name: Yolanda Nicholson

Title: _____

Agency/Organization: _____

Address: 8506 Sky View Dr. #304

City, State, Zip: Alexandria, Va 22309

Phone: 703 780 0008

E-mail: gln@cox.net

Please send a CD copy of the Final EIS to me.

2. Please check the one affiliation that best represents your role or interest in the EIS:

- | | |
|---|---|
| <input type="checkbox"/> Fort Belvoir Resident | <input type="checkbox"/> Recreational Organization |
| <input type="checkbox"/> State Government | <input checked="" type="checkbox"/> Private Citizen |
| <input type="checkbox"/> School/University | <input type="checkbox"/> Federal Government |
| <input type="checkbox"/> Civic Organization | <input type="checkbox"/> Business/Commercial Organization |
| <input type="checkbox"/> Federally Recognized Tribe | <input type="checkbox"/> Environmental Organization |
| <input type="checkbox"/> County | <input type="checkbox"/> Other: _____ |

3. EIS Areas of Concern. Please check the appropriate boxes and write your specific comments about the area of concern in # 4 below. More Comment Forms are provided at the Written Comments table if you need additional space.

- | | |
|--|---|
| <input type="checkbox"/> Construction | <input checked="" type="checkbox"/> Noise |
| <input type="checkbox"/> Traffic and Transportation | <input checked="" type="checkbox"/> Native American Resources |
| <input checked="" type="checkbox"/> Cultural Resources Historic Properties | <input checked="" type="checkbox"/> Air Quality |
| <input type="checkbox"/> Socioeconomics | <input checked="" type="checkbox"/> Water Quality |
| <input checked="" type="checkbox"/> Wetlands, Wildlife, Endangered Species | <input type="checkbox"/> Other: _____ |

(More comment sheets are available if you need additional space.)

4. Please write your comments in the space provided below.

Undeveloped forested land is one of Fort Belvoir's greatest public resources. It is virtually irreplaceable if lost. In a time of disappearing natural resources it is vital that green spaces be retained. Any plan that develops the remaining space should disturb the minimum number of wooded acres.

Preserving these spaces is vital to quality of life + in fact the very ability to sustain life.

Fort Belvoir's green spaces are truly a national treasure. Please do all possible to retain them.

"I think that I shall never see a poem as lovely as a tree..." providing

Quiet peaceful space to preserve a sense of sanity
Home of wildlife

Aircleaning factory
erosion control

Think twice before clearing or even opening up any land.

Web Site

Comments may be submitted online at: www.BelvoirBRAC-EIS.net

E-mail: Comments may be e-mailed to: environmental@belvoir.army.mil

Mail: Comments may be mailed to:
Attn.: EIS Comments
Fort Belvoir Directorate of Public Works
9430 Jackson Loop, Suite 100
Fort Belvoir, VA 22060-5116

All comments must be received or postmarked by May 1, 2007 to be considered in preparation of the Final EIS.

(More comment sheets are available if you need additional space.)

P5.1

PG

Subject: Belvoir BRAC EIS – Master Plan Land Usage

The Belvoir Draft BRAC EIS makes it very clear that this “EIS pertains to the initial step of the Real Property Master Plan (RPMP) update process – to revise the land use plan which must happen before the Army can begin siting facilities for BRAC implementation (ES.4.1 Land Use Plan Update).” This EIS gives the impression that with the approval of this EIS the RPMP will be approved and changed.

The Draft EIS states “the Belvoir Master Land Usage Plan must be changed from the current approved 1993 plan as amended in 2002 in order to make final recommendations on the siting of various BRAC facilities.” A perfect example is changing the land use of the current South 9 golf course from outdoor recreation to professional/institutional. Without first changing the land usage designations the siting of the hospital cannot take place.

It seems that Fort Belvoir garrison is putting the Belvoir Master Land Usage Plan on the fast-track and not doing an extensive analysis on the reasons and impacts of changing the land usage that should be done with changing such an important document. The Draft EIS does mention that the Master Land Usage will be further developed in the future. The coupling of the Belvoir Master Land Usage Plan with the Belvoir BRAC EIS gives the impression that the garrison is trying to hide something and trying to slide this important document under the radar in order to get the Belvoir EIS completed so that construction can begin.

No place in the Draft Belvoir BRAC EIS is there a clear definition of the new land use categories (Airfields, Community, Industrial, Professional/Institutional, Residential, Training and Troop) that one could make an educated guess on what type of facilities could be built and compatible with that land usage.

Recommend the Final Belvoir EIS clearly identify and define each of the new land usage categories and the types of facilities compatible with that land usage category so it can be a matter of record.

PG.1

P7

Subject: Belvoir BRAC EIS – Hospital Helipad Safety and Noise Considerations

P7.1 Belvoir BRAC has planned for a hospital and along with that hospital comes a Medical Evacuation helipad to receive injured patients. This hospital will be bigger and receive more patients than the current DeWitt Community Hospital. Helicopters could be flying into and out of that helipad 24/7 in all types of weather conditions. No place in the Draft Belvoir BRAC EIS does it address the safety impacts for the use of that helipad and any safety concerns for the residents of family housing, traffic on the major roads adjacent to each hospital site, power lines, and the planned flight patterns for each land use

alternative. It also seems helicopter engine noise from the use of the helipad will be higher and will be a problem. It also has not been assessed.

P7.2 Aircraft noise from Davison Army Airfield has been assessed and the aircraft noise from the airfield on each of the land use alternatives has been assessed but the helicopter aircraft noise generated by the hospital location has not been assessed for each of the land use alternatives.

P7.3 Recommend the Final Belvoir EIS address the safety concerns for people on the ground, in office buildings, in schools, on outdoor recreational sites and in cars created by the hospital helipad for each land use alternative and address the aircraft noise impacts for each alternative generated by the hospital helipad.

P8

Patrick Solomon

From: McLaughlin, Patrick M. FB-DPW [patrick.mclaughlin@us.army.mil] on behalf of Environmental [environmental-fb-dpwl@belvoir.army.mil]
Sent: Monday, March 12, 2007 5:51 PM
To: 'Holtham, Susan E NAE'; Jeff Moran; Patrick Solomon
Cc: Kicos, Marcia G; Keough, Dorothy FB-DPW; Sachs, Robert D. FB-DPW; Gillett, Susie; Carr, Donald N; Sanders, Bill L.
Subject: DEIS Comments - FW: Frustrated Bicycle Commuter

Please see below

Patrick M. McLaughlin
 US Army Garrison Fort Belvoir
 Chief, Environmental & Natural Resource Division
 9430 Jackson Loop
 Fort Belvoir, Virginia 22060-5116
 703-806-3193
 703-806-0622 FAX
 mclaughlinp@belvoir.army.mil

From: Kerner, David A. CONTRACTOR [mailto:David.Kerner_Contractor@dtra.mil]
Sent: Monday, March 12, 2007 1:18 PM
To: environmental@belvoir.army.mil
Subject: Frustrated Bicycle Commuter

Sir,

P8.1
 As the crow flies, my house in Alexandria is about 11 miles from my office at the Defense Threat Reduction Agency HQ on Ft. Belvoir. That's a very reasonable distance for bicycle commuting. Unfortunately, the crow isn't the one to dictate paths, and safe routes of reasonable distance have not been established; to travel safely from home to office by bike would take almost 30 miles, which is a real disincentive to biking to work. It would be helpful for Ft. Belvoir to weigh in with potential solutions during the planning stages mentioned in the draft EIS; the development of mapped and marked routes that support safe cycling between Ft. Belvoir and all points north, south, east, and west.

Many thanks for your time and efforts on this.

Best regards,
 David Kerner

P9

Patrick Solomon

From: McLaughlin, Patrick M. FB-DPW [patrick.mclaughlin@us.army.mil] on behalf of Environmental [environmental-fb-dpwl@belvoir.army.mil]
Sent: Monday, March 12, 2007 5:48 PM
To: 'Holtham, Susan E NAE'; Jeff Moran; Patrick Solomon
Cc: Kicos, Marcia G; Keough, Dorothy FB-DPW; Sachs, Robert D. FB-DPW; Gillett, Susie; Carr, Donald N; Sanders, Bill L.
Subject: FW: Comments and Suggestions on DEIS

Please see below.

Patrick M. McLaughlin
 US Army Garrison Fort Belvoir
 Chief, Environmental & Natural Resource Division
 9430 Jackson Loop
 Fort Belvoir, Virginia 22060-5116
 703-806-3193
 703-806-0622 FAX
 mclaughlinp@belvoir.army.mil

From: Michael Brownell [mailto:brownellm@earthlink.net]
Sent: Monday, March 12, 2007 4:17 PM
To: environmental@belvoir.army.mil
Cc: Gerry Hyland
Subject: Comments and Suggestions on DEIS

I have two concerns about the Fort Belvoir Draft Environmental Impact Statement:

P9.1
 1. Route 1 needs to be widened from the Woodrow Wilson Bridge interchange (I-495) all the way to Fort Belvoir. It is a mistake to think that the majority of the additional traffic generated by BRAC will use the Fairfax County Parkway. Many people will use the Route 1 corridor because they will buy homes there and/or go shopping or dining on Route 1 on the way to or from work. There is no shopping available on the Fairfax County Parkway.

People who live in Maryland will cross the Wilson Bridge and take the shortest route to Fort Belvoir which is of course Route 1. Route 1 is currently saturated with traffic and there is simply not sufficient capacity to add more cars on this Route. There is also an immediate need to extend the Metrorail system from Huntington to Fort Belvoir and to make provision for a future light rail or trolley line down Route 1, both of which will require the widening of Route 1.

P9.2
 2. The proposed location of the Army Museum is not convenient and I predict that it will not be successful. I would prefer to see the museum located at a future MetroRail or trolley stop near the main entrance to Fort Belvoir. It needs a hi-visibility location so that people will stop in on the spur of the moment while visiting Mount Vernon and other local attractions. Most people are not likely to plan to go there as a special trip.

Michael D. Brownell
 COL USA (Ret.)
 5903 Mount Eagle Dr # 608
 Alexandria, VA 22303-2528
 brownellm@earthlink.net

4/9/2007

P10

Patrick Solomon

From: McLaughlin, Patrick M. FB-DPW [patrick.mclaughlin@us.army.mil] on behalf of Environmental [environmental-fb-dpwl@belvoir.army.mil]
Sent: Wednesday, March 28, 2007 9:58 AM
To: Patrick Solomon; Jeff Moran; 'Holtham, Susan E NAE'
Cc: Sachs, Robert D. FB-DPW; Sanders, Bill L.; Gillett, Susie; Keough, Dorothy FB-DPW; Kicos, Marcia G
Subject: FW: COMMENTS: BRAC

The comments below are for your review/action.

Patrick M. McLaughlin
US Army Garrison Fort Belvoir
Chief, Environmental & Natural Resource Division 9430 Jackson Loop Fort Belvoir, Virginia
22060-5116
703-806-3193
703-806-0622 FAX
mclaughlinp@belvoir.army.mil

-----Original Message-----

From: diannekelly@netzero.net [mailto:diannekelly@netzero.net]
Sent: Sunday, March 25, 2007 11:22 PM
To: environmental@belvoir.army.mil
Cc: diannekelly@netzero.net
Subject: COMMENTS: BRAC

From: Dianne M. Kelly
8528 Southlawn Court
Alexandria, VA 23099-1522

To: Mr. Patrick McLaughlin
Fort Belvoir Directorate of Public Works Environmental
and Natural Resources Division
Building 1442
9430 Jackson Loop, Ft. Belvoir 22060-5116

Subject: Impact Statement for Implementation of 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia, prepared by U.S. Army Corp of Engineers, Mobile District with technical assistance from Tetra Tech, Inc. Fairfax, VA 22030, March 2007

Prepared by:

L. Douglas Turney, P.E.
Deputy District Engineer for Programs for Project Management

Approved by:
Brian L. Lauritzen
Colonial, U.S. Army
Garrison Commander
Fort Belvoir, VA

The document is located at the Sherwood Library. Only a partial review was made of the Executive Summary. This review is not complete.

These are a few of the recommendations to be included in the Executive Summary.

1. Affected Jurisdiction. Should include Prince William County.
2. Abstract. Should state Ft. Belvoir and the surrounding areas.
(Examples: Interstate 95, Telegraph Road and Jeff Davis Highway also known as Route 1, are the major roads which all intersect with the Fairfax Parkway.

10.3 3. Exact date of issuance is not acknowledged, is that because it is written as a draft? In any case, I am not sure when the sixty (60) day period begins and ends.

10.4 4. Formally, Ft. Belvoir was a troop support and training mission. Now it will be Administration and Logistics. Is anyone leaving? If know one is leaving, it should state it will continue troop support and training mission and will now add administration and logistics support.

10.5 5. Please include a map (if not included, or else state where it is; page #) to identify the 800 acres for professional use, initial use, residential ...).

10.6 6. ES.4.1. Land Use Plan Update. 7 areas - page ES- 2&3. This probably should state the location of maps on these pages to see what we are reading about in the Executive Summary. Include the buffer zones.

10.7 7. Page ES-3, do a breakout in 8 categories by the number of people, instead of 6 categories. This will be a good visual of the actual. (It leaves no room for error. Probably the numbers will change by 2011.) 146 personnel relocations which would support units, agencies and activities within Ft. Belvoir.

10.8 8. New title needed for ES.4.3. Schedule for Implementation Proposed.

10.9 9. ES.5 Alternatives. I was unable to find the three (3) other land use plans. Need to make subtitles. I could not find them in section 2. Also it would be wise to include a before and after picture, description with each alternative. It further provides an accurate, precise, information, (less for error).

All together you have four (4) plans. A clear way to write this is the Preferred Plan and three (3) options. ES.5.4. Change Title Preferred Plan..., Alternate 1 or Option 1..., Alternate 2 or Option 2..., Alternate 2 or Option 3....

Sincerely,

Dianne M. Kelly
Phone # 703-799-2681

P11

Comment Form

Environmental Impact Statement for BRAC 2005 Implementation
and Master Plan Update at Fort Belvoir, Virginia

NOTE: All information submitted will become public record.

1. Your information:

Name: Lee Schroeder
Title: Marine Safety Data Analyst
Agency/Organization: NGA-Bethesda
Address: 10401 Grosvenor Pl. #1006
City, State, Zip: N. Bethesda, Md. 20852
Phone: 301-530-7570
E-mail: _____

Please send a CD copy of the EIS to me.

2. Please check the one affiliation that best represents your role or interest in the EIS:

- | | |
|---|---|
| <input type="checkbox"/> Fort Belvoir Resident | <input type="checkbox"/> Recreational Organization |
| <input type="checkbox"/> State Government | <input type="checkbox"/> Private Citizen |
| <input type="checkbox"/> School/University | <input checked="" type="checkbox"/> Federal Government |
| <input type="checkbox"/> Civic Organization | <input type="checkbox"/> Business/Commercial Organization |
| <input type="checkbox"/> Federally Recognized Tribe | <input type="checkbox"/> Environmental Organization |
| <input type="checkbox"/> County | <input type="checkbox"/> Other: _____ |

3. EIS Areas of Concern. Please check the appropriate boxes and write your specific comments about the area of concern in # 4 below. More Comment Forms are provided at the Comment station if you need additional space.

- | | |
|--|--|
| <input type="checkbox"/> Construction | <input type="checkbox"/> Noise |
| <input checked="" type="checkbox"/> Traffic and Transportation | <input type="checkbox"/> Native American Resources |
| <input checked="" type="checkbox"/> Cultural Resources/Historic Properties | <input checked="" type="checkbox"/> Air Quality |
| <input type="checkbox"/> Socioeconomics | <input checked="" type="checkbox"/> Water Quality |
| <input checked="" type="checkbox"/> Wetlands, Wildlife, Endangered Species | <input type="checkbox"/> Other: _____ |

(More comment sheets are available if you need additional space.)

4. Please write your comments in the space provided below.

P11.1

Is this activity on the EPG going to threaten the wood Turtle (state threatened) or the Bald Eagle (federally threatened)? non stop

P11.2

Is there going to be a high speed [↑]monorail for the MD. people to use? This could be a q/t only system, rail going from Bethesda to nr. EPG?
This would make it easier on the commutes for MD people, relieve congestion in Va.)

P11.3

This BRAC was decided on by people and people do make mistakes, so is this a wise use of money? where is the money going to come from? shouldn't the money be secured 1st before anything is built on broken ground?

P11.4

Isn't this mass move going to encourage sprawl?

P11.5

What about telecommuting? Shouldn't this factor into the decision about moving NGA-Bethesda since ~ 40% of the people that work there live in MD?

Web Site

Comments may be submitted online at: www.belvoirmewvision.com (click on EIS)

E-mail Comments may be e-mailed to: environmental@belvoir.army.mil

Mall

Comments may be mailed to:

Attn.: EIS Comments

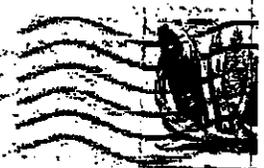
Fort Belvoir Directorate of Public Works
9430 Jackson Loop, Suite 100
Fort Belvoir, VA 22060-5116

All comments must be received or postmarked by July 2, 2006 to be considered in preparation of the Draft EIS.

(More comment sheets are available if you need additional space.)

Mr. Lee P. Schroeder
10401 Gmsvenor Pl Apt 1006
Rockville, MD 20852-4637

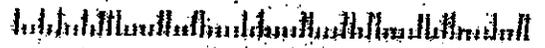
SUBURBAN MD 308
13 MAR 2007 PM 1 L



Fort Belvoir Directorate of Public Works
9430 Jackson Loop, Suite 100
Fort Belvoir, Va. 22660-5116

ATTN: EIS comments

22060+5116



RECEIVED
MAR 19 2007
ENVIRONMENTAL AND NATURAL
RESOURCE DIVISION
U.S. ARMY FORT BELVOIR

Testimony on the BRAC Environmental Impact Statement (EIS) provided on behalf of the Transportation Committee, Mount Vernon Council of Citizens Associations (MVCCA), provided without a review by or under the auspices of the MVCCA Council.

P12.1

1. **Immediate Appointment of a Transportation Demand Management Coordinator (TDMC):** The proposal for an appointment of a TDMC is an excellent idea. One should be appointed immediately and Fairfax County should be requested to appoint a counterpart. Action needs to be taken immediately, since the 2011 BRAC completion date places any new significant project already behind schedule, considering the need to determine funding sources and time for design and construction. The TDMC must be assured of adequate resources and authority to fulfill the projected mission.

P12.2

2. **Set Priorities and Determine Funding Sources:** The voluminous data provided in the EIS, depicting existing conditions and delineating projects underway or projected for completion by 2011, should serve as a good starting point, to permit the TDMC to prioritize requirements, add projects deemed necessary and initiate action to determine who will pay for what. The currently provided budget estimates, regardless of option to be selected, will not accommodate all requirements to be developed by the TDMC, even if Federal funding can be secured for the full amounts cited in the EIS, plus any currently requested Federal funding for spot transportation improvements related to the Fort Belvoir BRAC.

P12.3

3. **Fund Added Projects:** Funding will be needed for the 20 transportation projects, outside Fort Belvoir, that the Fairfax County Federation of Citizens Associations (FCFCA) identified by resolution and the MVCCA supported with its own resolution, deeming these projects essential for a successful area transportation plan. Answers must be developed for each project and consensus obtained as to who will pay for what.

P12.4

4. **Addressing Congestion from the Beltway to the Occoquan:** The EIS appears to be overly optimistic with its statement that the expected increase in traffic and congestion will disappear within 3-5 miles from Fort Belvoir. Current congestion on Route #1, for example, exists both northbound and southbound during each rush hour, mornings and evenings. Any added traffic potentially threatens gridlock. Assuming road construction projects are undertaken and completed, the TDMC must consider the road net from the Beltway to the Occoquan. An analysis may be required to ascertain impact for any project not completed by 2011.

P12.5

5. **Mass Transit Needs:** The statement that currently no plans exist for Metro expansion of either the Blue or Yellow Lines should raise a red flag. Fairfax County should be requested to expedite the pending Transit Study designed to determine optimal mass transit options for the Route #1 corridor. The TDMC should furnish appropriate BRAC input and remain in close coordination with this study group. Mass transit to Fort Belvoir, along with a properly located VRE station, is deemed to be an absolutely essential component of any successful area transportation plan.

P13

STATEMENT OF ROBERT D. McLAREN ON THE DEIS FOR BRAC

This statement adds to and expands the comments I made at the public hearing on 17 April.

My name is Robert D. McLaren and I live at 7810 Kincardine Court. This is in Hayfield Farm, a neighborhood that is close to Fort Belvoir on Telegraph Road. I moved to this address in June 1976 and am very familiar with Fort Belvoir – both as active duty military (Air Force) and a retiree who uses facilities at Fort Belvoir. Both my wife and I have used Fort Belvoir facilities since 1976. I am also very familiar with the Engineer Proving Ground (EPG) having coordinated with the U. S. Army Nuclear and Chemical Agency while on active duty. I was also on the Citizen's Task Force that came up with the recommendations for the Fairfax County Comprehensive Plan for the EPG. During the latter activity, I walked EPG many times to see on-ground conditions.

I reviewed the DEIS and have concluded that the DEIS is inadequate. It does not adequately address all the significant environmental impacts that need to be either avoided or mitigated. It also does not identify sufficient mitigation measures that will be done to alleviate the serious environmental impacts. The DEIS should therefore be formally revised and made available for public comment in a supplemental or revised draft EIS. The following paragraphs give my reasons for these conclusions.

A. Environmental impacts caused by traffic due to BRAC are not correctly identified.

(1) There is a basic underlying error in the DEIS as regards traffic. This error is that BRAC just causes a redistribution of traffic within the National Capitol Region – no new traffic is added. The DEIS points out that since the BRAC calls for the departure of some personal from the area, the overall traffic impact is improved. **This is false.** As personal move out of leased facilities to Fort Belvoir, there will be no reduction in traffic to those leased facilities since new tenants will move in. This is a direct and foreseeable consequence of BRAC. As a result, the traffic impact of personal going to work at Fort Belvoir is an addition to the already existing traffic, not redistribution. All trips to Fort Belvoir caused by BRAC should therefore be considered as new traffic in the DEIS.

(2) Furthermore, there are errors in the data presented. Table 4.3-15 shows the distribution of NGA employees. However, this is based on payroll data and therefore only includes federal employees, not embedded contractors. Embedded contractors are approximately 50% of the personnel coming to Fort Belvoir. All calculations done on the effect of the move of NGA are based on federal employees. The implicit assumption is that the embedded contractors have the same distribution as federal employees, but this is not supported in any fashion.

P13.1

P13.2

P13.3

(3) Support contractors, not embedded, are not considered. It can be expected that some support contractors will relocate to be nearer to the agencies they are supporting, but others will elect to stay in place. The impact of these contractors is not addressed and this is a serious oversight.

P13.4

(4) Table 4.3-15 shows that 45% of NGA will have to cross the Potomac to get to Fort Belvoir. While this figure is subject to debate (see A2 above) and may be much higher, this puts a significant number of new crossings over three bridges across the Potomac. This will have a significant impact on already overloaded bridges and make the existing situation worst. Yet none of these bridges are addressed in the study.

P13.5

(5) There is an error in one table on road intersections in Table 4.3-5 and this leads to a question about the accuracy of the others in this table and other tables. The DEIS shows the Telegraph Road/South Van Dorn Street intersection traffic condition as C in the AM and as D in the PM. This is an underestimate. At 5:00 PM, the intersection of Telegraph/South Van Dorn is always F. For example, I went through this intersection on 17 April on my way to attend the public hearing on the DEIS. I ran into traffic backed up from this intersection at 4:55 PM and did not clear the intersection until 5:00 PM. I traveled 0.4 miles in these five minutes. The backup that I encountered was much less than what I see on most days.

P13.6

(6) The methodology used to generate many of the tables showing traffic is not fully explained. If all this is done by modeling (such as Table 4.3-5), then the models need to be supplemented by current empirical data. The models used in traffic predictions often fail to correctly predict the actual traffic conditions. This is due to the inherent limitations of such models plus the models being applied in cases where they are not suited. Furthermore, numbers presented are precise and therefore are not realistic. All results should show a range of figures to account for uncertainties in the data used and the methodology.

B. The measures for mitigating the admitted serious (Paragraph 4.3.4.4) traffic impacts are inadequate.

P13.7

(1) Only potential measures are shown and a comprehensive list of measures that will be done, if any, is left to the future. Since there are many uncertainties in these measures, including cost, an informed guess cannot be made as to what measures will be selected.

P13.8

(2) Since the traffic impact is seriously underestimated, sufficient mitigation measures are not identified. The DEIS needs to be revised, showing a complete set of such measures. Additionally, there needs to be real measures identified and funded, not an incomplete wish list.

P13.9

(3) At this time, it is highly unlikely that a complete set of mitigation measures will be in place by 2011, the date the BRAC changes will occur. Therefore, severe traffic impacts will happen and be experienced by not only those newly assigned personnel to Fort Belvoir, but also all users of the roads in eastern Fairfax County. This is

Continued

P13.9
continued

unacceptable since this is a significant negative impact on the quality of life in this area of the County, plus an increase in air pollution.

P13.10

(4) Rail is not considered as a mitigation measure. This is a serious mistake – rail must be considered. As mentioned in A4, there will be significant numbers of people coming across the Potomac. If NGA at the Washington Navy Yard is a good example, a significant number of NGA personnel use metro rail today, and these personnel would have to find alternative ways of getting to Fort Belvoir. This will be via an already overloaded road network. While busses can help, they are still tied down to the road network and will suffer delays due to traffic. Rail extensions, either extending today's metro rail or by light rail, on both the Blue and Yellow lines to Fort Belvoir on Richmond Highway and to the EPG need to be put in place before 2011. Furthermore, there needs to be internal shuttles that will carry people from the new rail stations to their places of work.

P13.11

C. The change in land use categories (paragraph 2.2.1.2) will reduce protection to environmentally sensitive areas.

(1) The existing 1993 Master Land Use Plan includes a category for environmentally sensitive land (currently at 3,063 acres, which does not include EPG). The proposed new plan eliminates this category and places some of the environmentally sensitive land into a community category. However, large areas of environmentally sensitive land are placed into other categories – airfield, professional/industrial, and training. These three categories will encompass significant environmentally sensitive areas such as portions of the wildlife corridor, streams and wetlands in the southwest area, and all the streams and wetlands on the EPG.

P13.12

(2) While some protections remain in place for these environmentally sensitive areas, the overall designation as such is gone. As a result, future development can be expected to encroach into these areas. This expectation of future development is illustrated by a statement in paragraph 4.6.2.1.1 "The Professional/Industrial, Community, and Residential land uses would allow development in areas that were considered Environmentally Sensitive in the 1993 land use plan, although environmental constraints (e.g., endangered species habitat) would retain their protected status and continue to limit potential development in some of these area."

P13.13

(3) The Environmentally Sensitive category should remain in the land use plan.

P13.14

(4) The environmentally sensitive lands such as RPA and EQC should be clearly identified in the EIS. Furthermore, all streams on the EPG need to be surveyed to see if they are perennial streams and therefore have RPAs associated with them. The experience in Fairfax County is that the number of perennial streams was underestimated until a detailed survey was done using an approved protocol. (Prior to this, designation as a perennial stream was based upon mapping by the U. S. Geological Survey – said mapping acknowledged to be full of errors.) This added a significant amount of new RPA to lands in Fairfax County and I would expect the same at EPG. I do know of one

P13.14
continued

tributary in the northwest portion of the EPG that is a perennial stream and therefore deserving of protection. This stream was not identified as EQC because of policies in the early 1990's. These policies have been updated and this tributary would likely now qualify as having EQC, and would certainly have an RPA. In order to ensure protection of all RPAs, the EPG should have their mapping of streams updated by an on-site survey with approved protocols (such as developed by Fairfax County).

P13.15

(5) In addition to EQCs and RPAs, all environmentally sensitive areas need to be clearly identified in the EIS. At present, such detail is missing.

P13.16

(6) There needs to be a clear commitment to protecting all environmentally sensitive areas. Development should not be allowed in these areas, now or in the future.

D. Construction because of BRAC will have significant impact on streams.

P13.17

(1) A number of subwatersheds will experience over a 10% increase in 1- and 10-year storm event peak discharge (Table 4.7-7). These increases range up to 100% and will have serious impact on the quality of water in the streams. Furthermore, these increases can be even greater since experience in storm events has shown that models can, and do, under predict peak discharges.

P13.18

(2) The EIS does not address any impact on streams other than peak discharges. Due to the increase in impervious surface, many subwatersheds will experience an increase in total volume of water, thereby increasing erosion. Both peak discharges and total volume of water from storm events must be considered and treated.

P13.19

(3) A good list of mitigation measures is proposed (paragraph 4.7.2.4); however, there is no commitment to some of these. The language that some of the measures "could be included" needs to be changed to "will be included." These include LID management practices, man-made wetlands, restored riparian buffers, stream restoration projects, and participating in Fairfax County's Watershed Planning Process. A complete set of adequate mitigation measures needs to be identified and funded. I would also suggest a commitment to keeping storm water runoff to that of a forested condition. This commitment will help guide the selection of mitigation measures.

E. Additional mitigation measures can be done both within and outside of the areas affected by BRAC.

P13.20

(1) Stream restoration and riparian buffer restoration should be done at Davidson Airfield. This can help mitigate the impacts of BRAC on Accotink Creek.

P13.21

(2) Reforestation should be done on selected areas within Fort Belvoir. This would help replace some of the trees that BRAC construction removes. One such area would be those portions of the EPG that are being grubbed to remove UXO. Where possible, oak and mixed oak hardwoods should be considered for upland areas. Such replantings that

continued

P 13.21
continued

would help regenerate a mixed oak forest would have long-term benefits to water quality, air quality, and animal life that depends upon acorns from oaks as a food source.

F. Air quality impacts due to BRAC are not correctly identified.

P13.22

(1) Air quality impacts due to the increase in traffic are ignored. As mentioned in A1 above, the traffic to Fort Belvoir as a result of BRAC is essentially new traffic. However, the DEIS ignores this and states that there is an overall improvement to air quality because of BRAC. **This is false and is a serious flaw in the DEIS.**

P13.23

(2) The EIS does not take into consideration or include an analysis of the increased production of ground-level ozone (smog) or particulate matter (PM_{2.5}) that will result from the significant increase in traffic that will be coming to Fort Belvoir. An ozone and PM_{2.5} hot spot analysis should be included as part of the EIS to determine what impacts, if any, each alternative would have on local ground-level ozone and PM_{2.5} concentrations.

P13.24

(3) All air quality models and analyses done for the EIS should be fully explained.

P14

Jill Frier

From: Patrick Solomon
Sent: Monday, April 30, 2007 1:22 PM
To: Jill Frier
Subject: FW: EIS Comments: Museum of the US Army(Ms. Denda)

From: fpavp@aol.com [mailto:fpavp@aol.com]
Sent: Saturday, April 28, 2007 7:54 PM
To: environmental@belvoir.army.mil
Subject: EIS Comments: Museum of the US Army

Fort Belvoir Directorate of Public Works

The issues raised at the public hearing concerning the impact of the Fort Belvoir expansion are very valid, particularly concerning traffic access/congestion mitigation. It is clear major changes in the program are very much of a possibility, but I trust the plan for the Museum of the US Army will continue to fruition. Pending final funding, the place-holder status that this particular project enjoys in the master plan is a very significant, if relatively small, element of the larger program.

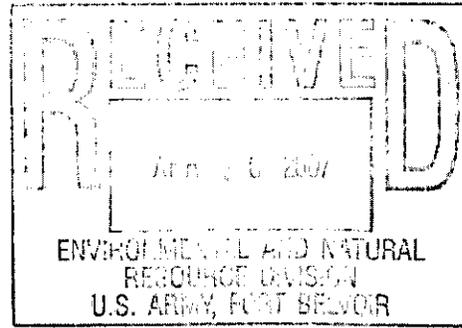
(P14.1) The importance of this long-overdue tribute to our army through exhibits and other factual evidence cannot be overestimated. The full story of how our armed forces fit into the fabric of history of this country has not been fully presented. In fact, the U.S. Army has a singularly important position in that history due to the continuity of the institution which predates the republic itself. This fact should justify the project in and of itself.

Such a facility will also provide a fine venue for veterans to visit and be honored, at the same time giving them an opportunity to share their stories which artifacts will no doubt evoke. We can only hope that the museum will be given an appropriate media profile so that its existence, unlike the current proposal, does not remain virtually anonymous.

Dale F. Denda
Resident,
Fairfax County, Virginia

P15

David & Jo-Anne Clark
7321 Hampton Manor Place
Springfield, VA 22150
April 30, 2007



Mr. Patrick McLaughlin
Fort Belvoir Directorate of Public Works
Building 1442
9430 Jackson Loop
Fort Belvoir, VA 22060-5116

Reference: Draft EIS for Implementation of 2005 BRAC Recommendations and Related Army Actions at Fort Belvoir, Virginia, March 2007

Dear Mr. McLaughlin,

1. Please add the following comments to the record concerning the Draft EIS for Implementation of 2005 BRAC Recommendations and Related Army Actions at Fort Belvoir, Virginia, March 2007. We live in the Towns at Manchester Woods (TMW) development within view of the trees on the north side of Engineering Proving Grounds. We consider ourselves concerned environmentalists by volunteering to help our community with trash pickup, removing invasive plants, and working professionally in the fields of environmental sciences. David uses mass transit to get to work in Falls Church.

2. We think mass transit was not given adequate attention in the DEIS by assessing only bus options. From our experience, buses don't attract professional employees in significant numbers as compared to rail. The EIS should talk to bus verses rail ridership. The light rail concept figure below (or something similar) should be assessed in the EIS. The reuse of existing Government owned railroad right-of-way extends to the CSX main line that connects to the Franconia-Springfield Metro/VRE station. The concept is approximately 6.5 mile long. It connects Metro & VRE to the proposed Army Museum as well as several Ft Belvoir

Ft Belvoir Light Rail Transit Line Concept



P15.1

locations which are convenient to work places. Request the EIS access ridership rates (bus verses rail), corresponding road traffic congestion, air quality improvements associated with various levels of ridership for each alternative, and if transportation mitigation projects can be avoided/simplified. The EIS should also discuss how a higher density of workers (Town Center Alternative) improves the viability of mass transit. Personnel screening could be located in the "Gateway" Station to address and security concerns. People wishing to visit the Army Museum would get a visitors pass that would only enable them to exit at the DLA/Museum Station.

3. Our preference is with the Town Center Alternative for the following reasons:

- Concentrates base function to make mass transit feasible, making it the best case for its success on Ft Belvoir
 - o Reduces traffic congestion and improves air quality
 - o Improves connectivity to Pentagon
 - o Leadership in Energy and Environmental Design (LEED) point – Sustainable Credit 4.1
 - o Reduces America's dependence on foreign oil
 - o Positive recruiting and retention tool for workers
- Less costly over long term
 - o Fewer security check points than the Preferred Alternative (saves money)
 - o Fewer emergency service stations than the Preferred Alternative (saves money)
 - o Potential to use central energy plants to provide chilled & hot water, steam and emergency power (higher efficiency – potential privatization)
 - o Less travel time lost for maintenance workers going to EPG or GSA
 - o Less travel time lost for workers going to main post for support services
- Takes advantage of existing infrastructure investments
 - o Utilities
 - o Emergency services
 - o Post support services (retail, legal, medical, recreation, fitness, housing, barracks, etc). Potential for increased AAFES sales to off-set loss of MWR profits due to loss of golf courses
 - o Reutilizes previously developed land LEED point – Sustainable Credit 3
- Less impact on the environment
 - o Biological resources
 - o Cultural resources
 - o Water resources (Potomac and Chesapeake Bay)
- Consider Enhanced Use Lease (EUL) to construct a Transportation Center on Ft Belvoir
 - o Third party financing, it wouldn't cost the Army or BRAC accounts the cost of this facility
 - o It could serve as a transportation center for public transit and security screening to the Post
 - o It could provide Government contractor leased space, conferencing spaces, hotel, retail spaces, doctor offices for civilians, childcare (instead of using BRAC dollars), and a physical fitness center for civilians, etc.
 - o A user fee included in public transit fares and rental of commercial space could help the developer recover their initial investment
- Ties into the Planning Principles (pg 2-2):
 - o Transportation Center would transform the post into a "world-class" installation
 - o Transportation Center would achieve a diversity of use and activities
 - o The Town Center Alternative strengthens the natural habitat – is the best alternative at protecting the natural habitat
 - o The Town Center Alternative is the most compact neighborhood of all the alternatives!

- Transportation Center could be used to meet the “*improve connectivity* planning principle” to “park once” – parking garages could also be EUL facilities
- The Town Center Alternative creates the most walk able neighborhood
- The Town Center Alternative can respect Ft Belvoir history
- The Town Center Alternative and Transportation Center can foster community benefit by bringing the best the private sector has to offer with a patriotic dedicated workforce

4. Given the proximity of the EPG to our residency, here are specific issues that need to be addressed in the Final EIS:

- P15.3 - Replace existing fence on north side & pickup of construction debris along fence line weekly
- BRAC construction to be at least 400-800 feet from existing homes for noise attenuation
- Leave in place the existing natural hardwood buffer zone between fence and the notional circular road enclosing the proposed EPG users (WHS & NGA)
- P15.4 P15.5 - BRAC construction to be of low and medium height facilities not to exceed 5 stories (ref Section 4.2.1.2.3, pg 4-4) above grade such that they cannot be seen through the natural buffer zone
- Placement of mechanical/energy plant systems to be located as far away as possible from residences, and be of a low noise variety with sound attenuating systems if noise levels exceed 65db measured at closest residence
- Limit construction activity (noise) on EPG to Monday to Friday with work hours not to exceed 0600-1800 hrs
- Construction traffic – improve roads first (Backlick & Fairfax County Parkway) before arriving BRAC employees! Hundreds or thousands of construction trucks/workers will choke existing roads. Some of these road improvements will need to occur during non-standard hours
- P15.6 - Extend Metro or light rail to EPG – shuttle buses to Franconia-Springfield Metro station will likely be stuck in traffic and therefore will not attract sufficient riders to measurably reduce traffic congestion
- P15.7 - Capture (to relocate) native large mammals (deer and fox) to avoid forcing them into surrounding neighborhoods that don't have sufficient resources or provide a proper habitat
- Oppose the creation of Neuman Street Gate
 - Neighborhoods to the north of EPG have only one way in and out @ Bonniemill Lane/Spring Village Drive. It is already a major battle neck for ingress and egress
 - This gate would force residents to compete with thousands of EPG employees to get on Springfield-Franconia Parkway
 - The mitigating road improvement would increase travel time (reduces response time) for emergency services (Fire & Rescue services from the Springfield Volunteer Fire Department) on Backlick Rd to neighborhoods north of EPG
- P15.8

5. Issues of concern with the Preferred Alternative:

- Pg ES-10, the Preferred Alternative disturbs more acreage than all but one alternative @ 353, Satellite Campuses @ 471, City Center @ 298, and Town Center @ 330. How is impacting more acreage better than less acreage?
- Pg 4-281, Table 4.8-11, the Preferred Alternative shows the greatest potential effects (in acres) on natural resources of all the alternatives, the Town Center the least impact.
- Pg ES-11, the Preferred Alternative has “The greatest potential expected increases in total nitrogen and total phosphorous pollutant loading to surface waters...with five watersheds expected to increase their loads by more than 10 percent.”
- Pg ES-11, “The City Center Alternative would have the greatest adverse effect on the biological resources of Ft Belvoir, followed by the Preferred Alternative.” The Town Center has the least impact of the alternatives.
- Pg ES-12, “The simple tally of the number of proposed projects” affecting cultural resources is not favorable to the Preferred Alternative.

- Pg ES-13, the City Center alternative has the least impact than the other 3 alternatives with respect to aesthetics and visual resources.

P15.10

- Pg 2-20, Table 2-4. What is an "overwatch booth"? Are these similar to a prison watch tower? Watch towers exceeding tree height are unacceptable if seen from area neighborhoods.

- Pg 4-76 bottom of page (Section 4.3.4.2.1), this section understates the impact to EPG proper as it combines it with the main post. The analysis of EPG (see pg 4-83) which receives 80% of the BRAC workers with limited ways to access the site: Backlick Rd, Newington, Fairfax County Pkwy (7100 not yet built), Springfield-Franconia Pkwy @ Newman St (a recommended transportation mitigation initiative). The 4 or so access points makes each (on average) busier than Tully Gate (Table 4.3-6) from 0600-0900 time frame with the 18,000 workers are expected to work. Suggest making EPG parking *outside* the security fence to simplify the screening process to just personnel and handbags similar to the Pentagon. The new campus should be friendly to walking.

P15.11

- Section 4.3.4.2.1, glaring oversight not to address how the BRAC workers currently get to work.
- Section 4.3.4.2.1, glaring oversight not to address any DoD shuttle bus(es) that would be required to shuttle employees between Ft Belvoir, EPG, GSA, Franconia-Springfield Metro or the Pentagon.

- Pg 4-85, *Transit Center/Facilities*, the brief description is vague. What is the concept? Would it be located on EPG or main post or both? How is this different from the *Rideshare Facility*?

- Pg 4-87, *Transit System*. Concern with bus travel is that unless dedicated bus or HOV lanes are provided, they'll be caught up in the congestion too. Need to provide a public transit alternative that is faster than SOV. Without saving time, it'll be difficult to get workers to ride a bus to get to work.

- Table 4.3-22, Mitigation Measure #12. How does adding access to EPG off of Neuman Street improve the level of service on the Springfield-Franconia Parkway (Route 7900)? If the LOS for mitigation measure #11 got to C or better, adding high volume (4 lane Neuman St) would reduce the LOS on Route 7900 and not "reduce volume on Parkway by 500 vph". Need to clearly explain how adding 500 vph improves the LOS on Route 7900?

P15.12

- Pg 4-231, Table 4.7-10. The Preferred Alternative affects more RPAs @ 13.7 acres than Town Center Alternative @ 7.4 acres (pg 4-240). How is impacting more RPAs better?

- Pg 4-266, Section 4.8.1.5.4. Development on EPG threatens the Small Whorled Pogonia, the only known location in Fairfax County. How will the Remote Inspection Facility identified on pg 2-13 affect the Small Whorled Pogonia?

P15.13

- Pg 4-270 & 271, Section 4.8.2.3.2. Need to protect PIF habitat on EPG & main post.

- Find an alternative location for the family travel camp project where campers will not come in contact with wood turtle habitat (we all know what kids do to turtles), and is not within an occasional-use foraging area for bald eagles.

6. Technical Issues with DEIS Analysis:

P15.14

- Did not assess the existing transportation methods used by current workers. WHS currently can use the Metro Yellow or Blue lines. Do the users make a significant percentage of the workers? Is it reasonable to assume if there were a mass transit option, that they'd continue to commute via mass transit? The Preferred Alternative without adequate mass transit appeal would likely have a net increase in air emissions and traffic congestion if the former mass transit commuters have to drive to Ft Belvoir due to the inadequate level of mass transit.

P15.15

- If the hospital were to be constructed at EPG under the City Center Alternative, wouldn't there have to be a troop medical clinic on the main post? To not have an out patient clinic on main post would require active duty personnel to travel to EPG for routine care which would increase lost duty time.

P15.16

- Tables 4.3-19 and 4.3-30 display Productions & Attractions for the Preferred and City Center Alternatives. Looking at EPG how is it that the production and attraction numbers are less under

the Preferred Alternative when there are 17,763 employees verses 11,705 employees under the City Center Alternative (a 50% population increase, but 11% fewer events)?

P15.17

Pg ES-9. On pg 4-161 (Section 4.4.4.3) the City Center Alternative states that "Under NSR permitting requirements, NOx emission offset at a ratio of 1:1.15 would have to be located and obtained for all stationary sources cited on EPG." If this is true statement, then all alternatives including the Preferred Alternative will require such a permit! Pg 4-157 (Section 4.4.2.3) fails to list this as a BMPs/Mitigation.

P15.18

Pg ES-14 & 2.2.2.3 pgs 2-19 to 2-21, the Preferred Alternative talks to the EPG upgrade utility expenses, but fails to discuss the "construction cost avoidance" of not having to build utilities (Project numbers 64097, 67487, 67959) associated with the Town Center & Satellite Campuses alternatives. Project number 64076 (Emergency Services Center) is also not required under the Town Center and Satellite Campuses Alternatives. Project number 65447 (USANCA Support Facility) would not be needed if EPG is not developed (Preferred Alternative or City Center Alternatives). Are there other projects not shown in the alternatives that would offset the savings? The projects for each alternative should represent what's truly required to support the requirement including ancillary and utility projects.

P15.19

- Pg ES-15 (ES.6.12), wouldn't UXO cost @ EPG be approximately the same for City Center @ EPG? Less for Town Center and Satellite Campuses? Clarify what is and isn't required when it comes to UXO and environmental remediation.

P15.20

- Pg 2-13 Fig 2-5 shows a "Remote Inspection Facility" (RIF), however there is no project number on Pg 2-14 (Table 2-3) for this project. Was the impact of the RIF assessed? Being on the west side of Accotink Creek places this in the area of the Small Whorled Pogonia (pg 4-266, Section 4.8.1.5.4) "the only location in Fairfax County where the rare species has been found." Clarify and assess.

P15.21

- Pg 4-24 Table 4.2-4, under the City Center Alternative; the hospital population moves to EPG. Would the existing Dewitt Hospital staff move to the new hospital as well? Would this increase the population shift to EPG and decrease the net increase to main post?

P15.22

- Pg 4-55 Section 4.3.2.5 assumes that after BRAC is implemented that a generation rate of 18 inbound trips per 100 people results. This assumption appears flawed. It would be lower once all the BRAC workers arrive.

P15.23

- Pg 4-63 Section 4.3.3.5, there is no discussion of when a public transit system (Metro or light rail) becomes economically feasible. Does a population mass of 18,000 or 30,000 make it feasible? Was Metro's planning board contacted about collaboration?

P15.24

- Pg 4-72 Section 4.3.4.2 Preferred Alternative, the second sentence should have included EPG as in "... Section 4.3.3, would worsen traffic conditions in the immediate vicinity of Fort Belvoir and EPG." Under the Preferred Alternative, 18,000 of the 23,000 (greater than 80%) BRAC personnel are located @ EPG with a road network ill equipped to handle this volume.

P15.25

- Pg 4-75 Section 4.3.4.2.1 discusses the time frame for a residential location shift. It states that "For 2011 it was 50 percent of both NGA and WHS employees would adhere to their existing distribution and the remaining 50% mimic the distribution of Fort Belvoir's existing employees." What is the basis of this assumption? An alternative assumption is that employees starting work post BRAC would mimic Ft Belvoir's distribution, but employee's in place prior to BRAC will stay in place the rest of their working life, if they don't look for a Federal job closer to their residence. How sensitive is the analysis to the assumption?

P15.26

- Pg 4-100, last sentence of Section 4.3.5.2.2. Delete the reference to "EPG". The Town Center alternative does not involve EPG, therefore an increased use of public transit would not remove traffic from EPG.

P15.27

- Pg 4-104, last paragraph on page, (Section 4.3.5.4). Explain why the cost of transit-related mitigation actions is less under the Town Center alternative (pg 4-89) than the Preferred Alternative (both require the same number of buses) yet the Preferred Alternative goes to more locations?

P15.28

- Pg 4-105 Table 4.3-28, why is the "Before" column different than the "Before" column in Table 4.3-22? All four tables under the "Before" should be the same as they represent the LOS *before* BRAC.

P15.29

- Pg 4-108, Section 4.3.6.2.1, first sentence below Table 4.3-30. Why is EPG being grouped with Main Post? It is just as geographically separated as GSA and should be analyzed as a separate site. Therefore the EPG site would show a huge percentage growth!

P15.30

- Pg 4-136, Section 4.3.9, third paragraph. The placing of all BRAC-related development within the Main Post also presents a synergy of mass – that makes public mass transit feasible! This would reduce overall congestion, speed access to and from work, and improve employee recruiting & retention efforts. The continued dependence on the automobile burning fossil fuel is not sustainable. President Bush admits America is addicted to oil, and therefore the Army should lead the way to encourage alternatives to the automobile. This BRAC action is large enough in scope to assess the potential environmental impacts of providing such a transit system. The workforce at Ft Belvoir would be larger than the Pentagon, and would fill largely empty rail cars on the Metro Blue and/or Yellow lines.

P15.31

- Pg 4-157 Section 4.4.2.3, Mitigation. If this section is correct that no mitigation measures are needed at EPG for a new site (see Pg 4-150, Section 4.4.1 referencing EPG and the GSA Parcel), then Pg 4-161, Section 4.4.4.3 is *wrong*. If EPG development under the City Center Alternative would require NNSR permitting requirements and NOx emission offsets, then the Preferred Alternative also would require the NOx emission offsets. Development under the Preferred Alternative is more extensive than under the City Center Alternative.

P15.32

- Pg 4-171 Section 4.5.2.2.1, Construction Noise. Temporary noise is NOT 4 years, but measured on the scale of days, weeks or several months. Neighborhoods north of EPG would have to live with construction starting in late 2007 through 2011 or beyond to complete everything associated with BRAC including mitigation!

P15.33

- Pg 4-316, Table 4.9-10. The potential effects for EPG under the Town Center and Satellite Campuses are mislabeled as "Same as Preferred" when in fact they are "No Effect" (ref Sections 4.9.3.1.1 & 4.9.5.1.1)

P15.34

- Pg 4-319, Section 4.10.1. Concerning the Region of Influence (ROI), why doesn't the ROI go beyond the listing communities given the vital importance and high use of the Interstate I-95 corridor (especially long distance trucking)? I-95 is a central transportation artery of the entire East Coast. With predicted traffic congestion discussed in Section 4.3, the transport of goods and services using I-95 will be caught up and delayed this affecting the flow of goods and services beyond the described ROI. This will affect the cost of shipping, and business productivity well beyond the stated ROI. Considering the congestion of the next best North-South alternative, I-81, they just aren't good options to business. The socioeconomic costs need to be described and assessed.

P15.35

- Section 4.12 on Utilities (water, sanitary, gas) did not adequately address if the existing service mains around EPG have sufficient capacity to support the alternatives without being upgraded (seemingly only electrical was described in sufficient detail to know that substation expansion will be required). The EPG analysis was less specific than the one on Fort Belvoir. The environmental impacts of the expansion efforts need to be assessed, as well as impact of the failure of not expanding on area utility consumers.

Respectfully,

David T. Clark, PE

Jo-Anne M. Clark

Comments related to the Draft Environmental Impact Statement for Implementation of 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia

Our comments are representative of the communities at Mason Neck, VA, and we would hope, of the other communities in Northern Virginia.

Our environment on Mason Neck is one surrounded by the same waters fed by the drainage from Fort Belvoir. Most of our land is refuge, parklands, a truly magnificent historic plantation, and institutions such as BLM that are all dedicated to protection of our environment in many ways. We citizens of Mason Neck have grown to share the responsibility for our treasures with our institutional neighbors. This sort of protective drive makes us sensitive to the impact potential of processes introduced into our environmental neighborhood. With that kind of background, we will express our concerns about water quality, air quality, the chain reactions of environmental quality degradation generated by traffic congestion along corridors, historic preservation, and wildlife conservation, by commenting on the contents of the DEIS.

While our comments will be indicating disagreement with a number of elements in the Fort Belvoir BRAC DEIS as prepared, we also believe it to be significant that we found almost total agreement with the statements delivered by Senator Webb, Representative Davis, Representative Moran, Fairfax County Supervisors Connelly, Kauffman, and Hyland, former Mayor Ticer (Alexandria), and Mr. Pierce Homer, Virginia Secretary of Transportation at the DEIS Public Hearing on April 17, 1997. Accordingly, we wish to record herewith our support for those comments on the DEIS made by all of our governmental representatives.

It is important to note that we are responding to elements of the Proposed Master Plan as well as to the DEIS.

Comments Keyed to content (*italics*) in the Executive Summary

ES-6

Similarly, the Satellite Campuses Alternative would be expected to result in the greatest disturbance to Chesapeake Bay RPAs (40 acres) and floodplain (3 acres), as compared with 14 acres of disturbed RPAs and 3 acres disturbed floodplain under the Preferred and City Center Alternatives, and 18 acres of disturbed RPAs and no disturbed floodplain under the Town Center Alternative.

It is our understanding that RPAs may not be disturbed to any degree by any entity. Is the US Army exempt from state laws, in such that 14 acres may be disturbed? In our opinion, no RPA land should be eligible for disturbance.

P16.1

ES-6

Increases in localized traffic near the installation, however, would result in minor increase in traffic congestion and subsequent long-term minor increases in localized carbon monoxide concentrations at nearby intersections.

This is stretching our experienced reality to a considerable degree. The transportation analysts need to "ground truth" the traffic assumptions by traveling from Woodlawn (Fort Belvoir) to the Fairfax County Parkway, or even the reverse of that during the hours, of 3:00PM to 6:00PM.

P16.2

Morning traffic is notably worse now than it was merely a year ago, and many of us on Mason Neck leave at 6:00 am.

ES.6.7 Biological Resources

Long-term moderate and minor adverse effects would be expected by implementing any of the four land use plans and by implementing BRAC. These effects would pertain to vegetation; wildlife; and endangered, threatened, and sensitive species.

• *Main Post. The primary areas of biological resources concentration on the Main Post are the Southwest Area, land bordering the shores of the South Post, and the Special Natural Areas (SNA). All the alternatives would reduce vegetated areas on the post by a substantial amount and could indirectly affect vegetative communities and wildlife through habitat fragmentation and isolation and increased occurrences of invasive species, which would result in a loss of ecological integrity.*

These are issues and impacts of pronounced concern within the Mason Neck community. We cannot emphasize enough that degradation of the natural resources on Fort Belvoir can directly degrade our shared Pohick Creek watersheds and damage the integrity of the wildlife corridors and habitats that our citizens, Commonwealth partners and federal partners on Mason Neck have worked for so long to protect.

We regret that the proposed master plan is of such a large scope, that it is difficult for us to assess the major proposed development footprints for truly measurable impacts. Without subdivision of the overall Master Plan map into a set of larger scale maps, the modeling of impacts remains a statistical analysis that defies a relational comprehension of impacts. Certainly, our communities need the published visual tools at appropriate scales to enable informed discussion of sustainable development strategies in our environmental neighborhood.

• *EPG. Natural habitat on EPG has been re-establishing itself since the 1970s, when intensive training activities on EPG ceased. West of Accotink Creek, development has been minimal, and east of Accotink Creek, the developed areas have not been used intensively in recent years. Natural aspects of the area east of Accotink Creek—such as woody growth and the use of undisturbed open areas by breeding birds—have increased.*

We recommend that the master planning process contain language that will impose constraints on construction activities during the peak nesting season that extends from March through June. Attendant mapping would necessarily limit constraints to the most sensitive habitat areas.

The Preferred and City Center Alternatives have the greatest adverse effects on the biological resources on EPG because they have more project development in EPG, while the Town Center and Satellite Campuses Alternatives have less development occurring on EPG.

Overall, the City Center Alternative would have the greatest adverse effect on the biological resources of Fort Belvoir, followed by the Preferred Alternative. The Town Center and Satellite Campuses Alternatives would have the least impact on biological resources.

Again, we revisit the case for including the GSA warehousing tract in the full evaluations of impacts on natural resources and transportation.

ES-7

For all the alternatives, the significant transportation effects would be limited to the entrance points and the immediately adjacent transportation facilities. These significant effects would disappear into the regional traffic flow within 3 to 5 miles of Fort Belvoir. While the alternatives differ somewhat in terms of the detailed extent and location of these effects, on a regional basis, beyond the 3- to 5-mile range, the effects become negligible for all alternatives.

Transportation effects are more likely to impact several corridors, notably, I-95, Fairfax County Parkway, Route 123, and U.S. Route 1, in ranges up to 8 to 9 miles from EPG and Fort Belvoir at Route 1, in the north, south, and westerly directions before any disappearance of effects could be measurable. In our opinion, then, the transportation effects will not, with certainty, become negligible within 3 to 5 miles of Fort Belvoir.

ES-8

Order-of-magnitude costs for the mitigation actions are estimated to be as follows:

- Preferred Alternative, \$458 million
- Town Center, \$732 million
- City Center, \$471 million
- Satellite Campuses, \$742 million

For the Preferred and City Center Alternatives, the ability of transit to contribute to the mitigation is greater than for the other alternatives because these alternatives use sites that are closer to the regional rail network. Their locations make it easier to achieve the targeted 5 to 10 percent transit mode share goals.

1. Does the estimated \$458 million (Preferred Alternative) estimate include necessary connection improvements to make rail links viable?
2. Does the estimated \$458 million include necessary costs to provide on-site bus service availability or subsidies?
3. Does the estimated \$458 million represent a financial commitment from DOD in order to implement Preferred Alternative, and if not a DOD commitment of funding, is the cost included as part of the net economic impact?
4. It appears from the ES and from Chapter 4, Affected Environment, that the estimated \$458 million is funding only the mitigation of transportation impacts that are contiguous to the Fort Belvoir development sites (Preferred Alternative). Please see comments on several details in Chapter 4, below.

In consideration of a holistic assessment of transportation impact mitigation, the reasonable DOD responsibility for mitigation costs can grow from the DEIS estimated \$458 million to an estimated range of \$700 million to \$900 million for improvements to I-95, Fairfax County Parkway, and Route 1.

ES-9

For all the alternatives, implementing the BRAC action would decrease both the number of vehicles and the total vehicle miles traveled (VMT) within the region. In turn, regional motor vehicle emissions would decrease. This decrease would be primarily due to a net reduction of approximately 1,700 personnel from the region. These are personnel leaving Fort Belvoir to areas outside the NCR. These BRAC-related reductions in emissions would constitute an ongoing net benefit to the region's air quality. Increases in localized traffic near the installation, however,

P16.9
continued

would result in minor increase in traffic congestion and subsequent long-term minor increases in localized carbon monoxide concentrations at nearby intersections.

It is difficult to imagine that a reduction of 1,700 personnel would offset an increase of 22,000 personnel to create a decrease in emissions for a net benefit to the region's air quality.

ES-11

The greatest potential expected increases in total nitrogen and total phosphorous pollutant loading to surface waters would be expected to occur under the Preferred Alternative and the City Center Alternative, with five sub-watersheds expected to increase their loads by more than 10 percent.

P16.10

Does the statement referring to increased loading as an impact suggest that no mitigation measures are planned? A 10% load would, in our opinion, exceed acceptable standards. If mitigation measures are anticipated, as some measures are detailed in Chapter 4, then a brief synopsis, including cost estimates and technology, should certainly be included in the Executive Summary because of the great importance of water quality to the surrounding communities.

1-3 (from Scoping Process)

Socioeconomics

Local communities will not have a sufficient tax base for hiring teachers and creating additional space to accommodate the influx of students.

One comment in the report seemed to indicate that planning for schools was on-going within the county and therefore did not need to be addressed in the report.

Examine the real commuter, road, and air quality impacts; include the precise number of contractors serving DoD entities to be relocated and the dollar figures of contracts under which these contractors perform.

P16.11

It appears that the DOD employees were surveyed, but contractor employees numbers were not addressed.

Include precise numbers of bedrooms in the proposed housing to plan the precise number of children who will attend Fairfax County Public Schools.

We did not see these numbers addressed.

4-00

Transportation. On-post facilities projects, taken together, would be expected to have negligible effects on Fort Belvoir area traffic. Impacts on the transportation network associated with off-post projects would be mitigated through roadway improvements by the developers. The largest contributor to future impacts would be the proposed National Museum of the U.S. Army. This could be sited at either the North Post golf course or along Route 1, east of Pence Gate. At either location, additional road improvements would be required. To quantify the effects of the museum on the transportation system,

P16.12

trip generation and mode split would need to be developed for site traffic.

We believe that the impacts of the most likely museum sites should be incorporated into the BRAC EIS because the developments are not mutually inclusive with regards to environmental impacts, in terms of direct and cumulative impacts.

4-220

Fort Belvoir is incorporating storm water management and protection methods into land planning and new development as well as correcting and retrofitting existing problem areas. A storm water drainage system master plan study is currently underway, as discussed above. This study will identify current deficiencies (e.g. capacity problems, outfall problems, stream bank erosion) and determine infrastructure needs required to meet BRAC requirements and long-term growth through 2030. This study will also provide recommendations for storm water quality and quantity control, such as required design criteria, potential locations for new facilities, and methodologies that should be used or avoided. The MS4 storm water management program discussed in Section 4.7.1.3.1 requires "minimum control measures," including Best Management Practices (BMPs) to control storm water and pollutants in runoff. Fort Belvoir is developing pollution control measures that must be implemented within 5 years of permit issuance.

This (above) is a good example of a replacement for the non-discussion in the ES. We would like to see some cost proposals associated with an aggressive storm water management plan for newly developed areas (EPG), and some assurance during this master planning/EIS process, that adequate storm water management funding would be a part of the BRAC funding, and not subject to the vagaries of future CIP requests.

In addition to prioritizing storm water management systems, we strongly support the inclusion of language in the adopted master plan (Preferred Alternative) that mandates the use of permeable surfaces at every opportunity for new constructed facilities or in re-constructed facilities, regardless of cost differences.

ES-11

Long-term moderate and minor adverse effects would be expected by implementing any of the four land use plans and by implementing BRAC. These effects would pertain to vegetation; wildlife; and endangered, threatened, and sensitive species.

• *Main Post. The primary areas of biological resources concentration on the Main Post are the Southwest Area, land bordering the shores of the South Post, and the Special Natural Areas (SNA). All the alternatives would reduce vegetated areas on the post by a substantial amount and could indirectly affect vegetative communities and wildlife through habitat fragmentation and isolation and increased occurrences of invasive species, which would result in a loss of ecological integrity*

One of the flaws in an EIS process that is focused only on-site development impacts is that the integrity of wildlife genetic corridors is ignored at a larger cost to the connected ecological system. The very spirit and language of NEPA is directed towards consideration of extended and collateral affected environments. Thus, the potential impacts of BRAC development areas are a concern to those who support wildlife habitats on Mason Neck and in Northern Virginia.

ES-12

Assessment of specific adverse effects to historic properties from the proposed BRAC projects depends on the exact location of the proposed projects and the specific design details of the projects. These details include such things as building materials, construction footprint, height of buildings, and building design. Many of these project details cannot be determined until Fort Belvoir initiates the project design process. Until these details are developed, the exact nature and extent of adverse effects cannot be determined.

It should be possible and necessary, however, to map the existence of historic sites and document areas of prehistoric archaeological sites within the mapped development areas, in support of the idea that once an archaeological resource is buried by structural development or terraforming, the impact becomes irreversible. Such potential impacts are significant because the lands under and adjacent to Fort Belvoir and immediate vicinity were occupied in historic America to dates as early as middle 17th century (early colonial), and in prehistoric times by native Americans as early as 5000 BC. Comprehensive analysis of cultural resources belongs at the proposed land use level and prior to the Final EIS.

Additionally, it is important to include the mapping of sites or structures of historic significance that are off-property, but adjacent to Fort Belvoir, for consideration of view-shed or transportation development impacts. The historic places on and around Fort Belvoir are important to the residents of Mason Neck and Northern Virginia because they contribute to the quality of life in irreplaceable ways.

The following are NRHP (National Register of Historic Places) sites within or adjacent to Fort Belvoir:

- Belvoir Mansion Ruins and Fairfax Grave-site.
- Pohick Episcopal Church.
- Gunston Hall Plantation and Mansion.
- Woodlawn Plantation.
- Pope-Leighey House
- Thermo-Con House, Fort Belvoir.
- Alexandria Friends Meeting House and Cemetery (NRHP eligible).
- Washington's Grist Mill
- Mount Vernon Mansion and Plantation

The following are sites within the Fairfax County Inventory of Historic Sites:

- Accotink United Methodist Church.
- Belvoir Mansion and Fairfax Grave.
- Camp Humphreys Pump Station and Filter Building.
- Fairfax Chapel.
- Fort Belvoir Historic District.
- Woodlawn Baptist Church (original).
- U.S. Army Package Power Reactor.

Some sites may have been overlooked in this list.

It should be noted that a portion of Fort Belvoir on South Post, extending through Mason Neck, contains remnants of the original route of the 600 mile Washington-Rochambeau baggage train on the march to Yorktown. The route is currently under study by National Park Service, with the

P16.15

P16.15
Continued

Northern Virginia portion being researched by the historian as jointly funded by Northern Virginia counties. Following completion of a FEIS in the Summer of 2007, it is expected that the 600 mile length of the route will be declared a National Trail by Congress later this year.

Comments Keyed to SECTION 4.0: AFFECTED ENVIRONMENT AND CONSEQUENCES

Table 4.2-6
Comparison of Land Use Categories Between the 1993 Land Use Plan and the Proposed Land Use Plan.

P16.16

The proposal to bundle the category of Sensitive Land Uses with several other non-sensitive categories in effect dilutes the importance of those sensitive natural areas on Fort Belvoir by default. We insist that the category for Sensitive Land Uses not be removed or substituted by a "Community" category.

Table 4.3-17 indicates a population increase of 2,767 by 2011 on Mason Neck. Given the absence of major private land blocks, and the few remaining infill opportunities, it would be difficult to forecast a population increase greater than 400 by 2011. Possibly, the population increase in Table 4.3-17 for Mason Neck was forecast based on mapping omissions in Figure 4.3-4. The map does not indicate the 800+ acres converted to public lands (Bureau of Land Management) in 2003, nor 115 acres purchased by Fairfax County Parks Authority in April, 2007. Demographic projections cited for Mason Neck and generated by Fairfax County prior to 2000 may also be inaccurate. The implications of no capacity to further absorb employment related population increases on Mason Neck would increase the travel time to and from the south of Fort Belvoir, to be factored into traffic forecasts and commensurate air quality impacts.

P16.17

Table 4.3-9, List of Improvements Beyond the Constrained Long-Range Plan, indicates improvements to Old Colchester Road from Route 1 to its terminus. Because of its historical status, it is unlikely that Old Colchester Road will ever be altered significantly for traffic improvement. The road is a Virginia Byway, it is soon to be included in the 600 mile Washington Rochambeau National Historic Trail, and the road is also a current nominee for the National Register of Historic Places.

P16.18

P. 4-84

Transit Systems. Mode split—the fraction of the employee population that would use mass transit—for the Main Post is 1 to 2 percent. The rail portion of the transit system does not directly serve the Main Post or EPG. Implementation of the BRAC-related projects, which would affect the vast majority of new personnel at Fort Belvoir, would likely not adversely affect use of the rail systems because of the continued lack of direct service.

P16.19

A predictable mode split of 2% at the EPG or Fort Belvoir sites is not a fundamental platform, for what was hoped to be a world class installation, by any notion of serious land use planning in the 21st century. Although it is our intent here to respond to the DEIS with special attention given to the preferred alternative, we see a more fundamental need for either a site selection directly linked to the Franconia transportation hub, or a DOD commitment to funding an appropriate rail expansion to Fort Belvoir. Bus service alone could not contribute significantly to the needed mode split, nor would a more fragmented user trip help to attract additional mass transit users.

P16.19
continued

The modal split issue provides an example of the reason our thinking is aligned with Representatives Davis and Moran in their insistence that the site selection process should not be closed, and that the alternative GSA warehouse site should be seriously considered.

Table 4.3-9, List of Improvements Beyond the Constrained Long-Range Plan, indicates improvements to Old Colchester Road from Route 1 to its terminus. Because of its historical status, it is unlikely that Old Colchester Road will ever be altered significantly for traffic improvement. The road is a Virginia Byway, it is soon to be included in the 600 mile Washington Rochambeau National Historic Trail, and the road is also a current nominee for the National Register of Historic Places.

Statement on page 4-154:

P16.20

Motor Vehicles. The realignment of Fort Belvoir would decrease both the number of vehicles and subsequently the total vehicle miles traveled within the region. In turn, regional motor vehicle emissions would decrease. This decrease would be primarily because of a net reduction of approximately 1,700 personnel leaving Fort Belvoir to locations outside the region. Although overall additional personnel at Fort Belvoir is expected to increase, the new personnel and the miles they currently commute are already with in the NCR. In addition, many of the new personnel are expected to either relocated to or be replaced by individuals living in areas outside, primarily south of, the region. These BRAC-related reductions in emissions would constitute an ongoing net benefit to the region's air quality. Therefore, although there is an SIP-based regional budget for motor vehicles, it was unnecessary to perform a direct comparison.

This statement is either inaccurate or simply obtuse because the BRAC Commission's recommendations will generate a net increase of 22,000 people in the workforce on Fort Belvoir.

It would seem that a comparison of emissions based on the net increase of 22,000 personnel, with 68% commuting to and from the south, contributes to a measurable load in traffic, travel delay, and the resulting emissions.

Excerpts from the written statements by Virginia Secretary of Transportation, Mr. Pierce Homer, during the BRAC DEIS Scoping phase (Appendix B, Part 3), reflect the opinions of many of us in Northern Virginia and in Mason Neck:

P16.21

"..... Virginia will provide approximately \$89 million in construction funding for this (final segment of Fairfax County Parkway) Fairfax County Parkway project and approximately \$4 million worth of completed preliminary engineering work. Once the project and directly-related environmental remediation is complete, the Commonwealth will accept the Parkway into the state system of highways for long-term maintenance and operations. This arrangement will allow the Department of the Army, in consultation with the Commonwealth and the Federal Highway Administration, to design and construct the Fairfax County Parkway in a way that better integrates the limited available transportation capacity with the specific land uses and security needs of Fort Belvoir.

In addition, Virginia will fully fund and construct a fourth lane on I-95, from Rt. 123 to the Fairfax County Parkway, at an estimated cost of approximately \$75 million.

I need to underscore, however, that any serious analysis of the long-term Fort Belvoir transportation needs must consider more than just the final segment of the Fairfax County Parkway and the I-95 fourth lane."

It is our opinion that the impacts of BRAC proposed development on transportation capacity will extend from Fort Belvoir to I-66 on Fairfax County Parkway, from the Fairfax County Parkway to Route 234 on I-95, and from Fort Belvoir to Route 123 on Route 1. Additionally, because of collateral non-DOD support services and secondary commercial enterprises locating or re-locating to Fort Belvoir nearby locations (estimate 3,000-5,000 employees to the south, and 5,000-6,000 to the north), transportation capacity should be considered from Route 123 to I-495 on Route 1.

P16.21

continua

It appears to us that the DEIS and supporting studies have only considered the immediate Fort Belvoir-serving infrastructure elements of the larger affected environment, and this is an important concern for all of us in Mason Neck and Northern Virginia who may be obliged to fund transportation solutions in the future resulting from full BRAC implementation (2011-2016).

Regarding potential road improvements within Fort Belvoir, however, the BRAC generated facility master plan offers an opportunity to finally connect Main Post with North Post efficiently with a flyover(s) at Route 1, thus allowing unimpeded communication between the two properties, along with further streamlining traffic flow on Route 1.

In summary, we believe that many of the analyses in the DEIS are of extraordinary value to the community at large and to the implementation of BRAC at Fort Belvoir, especially those addressing economic impacts and transportation impacts. We would only emphasize here once again, the need of an EIS with important transportation implications, to reach beyond minimum NEPA requirements - to examine and report impacts at a scale commiserate with realistic regional influence. Further to that, we must observe that although the transportation impacts of BRAC are of great political and popular importance, a more publicly quiet environmental advocacy in these neighborhoods surrounding Fort Belvoir would wish to see the assessments of biological impacts and water quality impacts taken to a higher, even restorative, level of mitigation, including funding proposals.

P16.22

P16.23

Again, It is important to many of us citizens in Fairfax County, with regards to cultural resources, that a responsible ROD be contingent upon creditable consultation with appropriate Fairfax County cultural resources representatives at every step in the Fort Belvoir BRAC planning process.

Finally, we believe that one of the most important services that Department of the Army could provide to the Northern Virginia communities is to establish a community stakeholders group that is inclusive of businesses, churches, local schools, and the many citizens groups whom will experience the impacts and benefits of change brought to Fort Belvoir.

P16.24

P16



Mason Neck Citizens Association

P.O. Box 612, Lorton, Virginia 22199

May 1, 2007

Mr. Patrick McLaughlin
Fort Belvoir Directorate of Public Works
Environmental and Natural Resources Division
Building 1442
9430 Jackson Loop
Fort Belvoir, Virginia, 22060-5116

Dear Mr. McLaughlin:

We are pleased to submit our comments on the Draft Environmental Impact Statement (DEIS) for Implementation of 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia. Our comments are representative of the communities at Mason Neck, VA, and we would hope, of the other communities in Northern Virginia.

Our environment on Mason Neck is one surrounded by the same waters fed by the drainage from Fort Belvoir. Most of our land is refuge, parklands, a truly magnificent historic plantation, and institutions such as BLM that are all dedicated to protection of our environment in many ways.

We citizens of Mason Neck have grown to share the responsibility for our treasures with our institutional neighbors. This sort of protective drive makes us sensitive to the impact potential of processes introduced into our environmental neighborhood. With that kind of background, we will express our concerns about water quality, air quality, the chain reactions of environmental quality degradation generated by traffic congestion along corridors, historic preservation, and wildlife conservation, by commenting on the contents of the DEIS. Therefore, we feel it appropriate to request *Consulting Party Status*.

P16.25

Additionally, we believe that one of the most important services that Department of the Army could provide to the Northern Virginia communities is to *establish a community stakeholders group* that is inclusive of businesses, churches, local schools, and the many citizens groups whom will experience the impacts and benefits of change brought to Fort Belvoir. This group should meet regularly and work in partnership with decision makers throughout every step of the

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process and designate working groups to focus on cultural, biological, environmental quality, design and traffic aspects.

While our comments will be indicating disagreement with a number of elements in the Fort Belvoir BRAC DEIS as prepared, we also believe it to be significant that we found almost total agreement with the statements delivered by Senator Webb, Representative Davis, Representative Moran, Fairfax County Supervisors Connelly, Kauffman, and Hyland, former Mayor Ticer (Alexandria), and Mr. Pierce Homer, Virginia Secretary of Transportation at the DEIS Public Hearing on April 17, 2007. Accordingly, we wish to record herewith our support for those comments on the DEIS made by all of our governmental representatives.

P16.27

In summary, we believe that many of the analyses in the DEIS are of extraordinary value to the community at large and to the implementation of BRAC at Fort Belvoir, especially those addressing economic impacts and transportation impacts. We would only emphasize here once again, the need of an EIS with important transportation implications, to reach beyond minimum NEPA requirements - to examine and report impacts at a scale commiserate with realistic regional influence. Further to that, we must observe that although the transportation impacts of BRAC are of great political and popular importance, a more publicly quiet environmental advocacy in these neighborhoods surrounding Fort Belvoir would wish to see the assessments of biological impacts and water quality impacts taken to a higher, even restorative, level of mitigation, including funding proposals. Further, as stated above, this continued analyses and planning should only take place in concert and through active involvement of a dedicated community stakeholders group.

Sincerely yours,



Bruce Scott
President

P17

Martha Claire Catlin
8324 Mount Vernon Hwy.
Alexandria, VA 22309
May 1, 2007

Patrick McLaughlin
Fort Belvoir Directorate of Public Works
Environmental and Natural Resources Division
Building 1442
9430 Jackson Loop
Fort Belvoir, VA 22060-5116

Dear Mr. McLaughlin:

I write as a local historian with a strong interest in preservation of historic properties potentially affected by future Army decisions regarding the implementation of activities associated with BRAC at Fort Belvoir. I am a participant as a consulting party in the Section 106 review process for BRAC pursuant to National Historic Preservation Act, a process that I hope and expect will provide future opportunities for full consideration of the effects of BRAC on properties listed or eligible for listing on the National Register of Historic Places.

P17.1 I am concerned that the National Environmental Policy Act review process for BRAC appears to be far more advanced than the Section 106 review process. I believe it is important that critical decisions not be made without full consideration of effects to historic properties through Section 106 consultation among all stakeholders. I am also

P17.2 concerned that the DEIS attempts to address land use planning in a manner that appears to be entirely disconnected from the BRAC issues. Clarification of the rationale for land use proposals—whether or not they are BRAC related—is needed before these proposals can be evaluated.

P17.3 The level of information included in the DEIS is also inadequate for selection of a preferred alternative, especially regarding effects to historic properties. I would note that, as written, the DEIS includes BRAC alternatives that, with further analysis and adjustment, may have the potential to avoid or minimize impacts to historic properties through concentration of new development and functions away from sensitive historic properties. However, where the DEIS identifies specific land use proposals to be paired with such alternatives, the protection of historic properties appears to be outweighed or reversed. Therefore, the relationship between each alternative and its associated land use proposals, perhaps through lack of explanation, seems arbitrary. Among the most troubling examples of this is the proposal to construct a new access road or control point opposite Pence Gate. It is not clear why this land use element must be introduced into alternatives that otherwise could, in comparison to other alternatives, be preferable for their potential to avoid historic property impacts.

P17.4

I strongly support the preservation and protection of all historic properties potentially affected by Fort Belvoir's BRAC activities, including direct, indirect, and cumulative impacts. The Virginia State Historic Preservation Officer has listed, in Marc Holma's letter of April 4, 2007 to Colonel Lauritzen, some of the highly significant historic properties on or near Fort Belvoir, including three National Historic Landmarks, that should be considered under NEPA. Another highly significant historic property that I would add to this list is the Mount Vernon Memorial Highway, which would certainly become more congested as a result of BRAC, and could suffer considerable loss of National Register integrity as a result. The National Park Service's views should be sought and considered regarding the protection of both the affected National Historic Landmarks and the George Washington Parkway, the park unit of which the Mount Vernon Memorial Highway forms a part. The majority of the most significant of the potentially affected historic properties, including those which are destination heritage sites, are located near the main post of Fort Belvoir and could be protected from adverse impacts through concentration of new development and functions at the Engineering Proving Ground and the GSA parcel.

In addition to the full range of historic properties potentially affected, I have a particular concern regarding the impact of Fort Belvoir's BRAC decisions on the Woodlawn Quaker Meetinghouse and Burial Ground, a property whose history and architecture I have researched over many years and whose unusual historical significance has been confirmed and documented. This unique surviving element of the pre- and post-Civil War Woodlawn and Accotink anti-slavery Quaker settlement is currently threatened by a number of changes, many of which were brought about by security measures necessitated by the events of September 11, 2001. Fort Belvoir officials are to be commended for having worked closely with the Meeting and other stakeholders, including myself, to help ameliorate such threats. As BRAC decisions are considered, I hope the work that has been accomplished by Fort Belvoir through consultation with the Meeting and others is not reversed or eroded.

P17.5

In September 2006, the Virginia State Review Board approved the "Preliminary Information Form" submitted by the Alexandria Monthly Meeting of the Religious Society of Friends (at Woodlawn) for purposes of nominating the Meetinghouse property to the National Register of Historic Places. I request that the DEIS be revised to reflect the status of the Woodlawn Meetinghouse and Burial Ground as having been determined individually eligible for the National Register of Historic Places. In recognition of the status of the Meetinghouse property as individually eligible for the National Register, I request that the DEIS be revised to more adequately identify and address the full range of anticipated effects each of the alternatives would have on the characteristics of the Meetinghouse property that qualify it for the National Register.

The DEIS, as written, notes that the Meetinghouse property is eligible for the National Register as a component of the Woodlawn Historic District and that the property is a component of the Fairfax County Woodlawn Historic Overlay District. However, in addition to inadequate recognition of the historical significance of the Meetinghouse

property, the DEIS also fails to adequately document the significance of either of the two historic districts of which the Meetinghouse is a part. These two intersecting historic districts represent a remarkable continuum of history in southern Fairfax County that is currently reinforced and complemented by Fort Belvoir's open space, its natural areas, and its vistas. A BRAC alternative that places new construction and new functions at the Engineering Proving Ground and the GSA parcel could help preserve the complementary role of Fort Belvoir's open spaces and vistas with respect to its neighboring historic properties.

P17.6

The DEIS attributes much of its now outdated and inadequate information on historic properties to studies by Goodwin & Associates from 2001. Apparently such studies were done as part of Fort Belvoir's Integrated Cultural Resources Plan. The DEIS states that the ICRMP is to be updated on a five-year cycle, suggesting that the update is overdue. In light of the adverse effects to historic properties alluded to but inadequately analyzed in the DEIS, it is important and could be quite useful for Fort Belvoir to immediately begin to address this need and to seek and consider the views of stakeholders on the ICRMP so that the updating of the Plan may correlate with and inform the NEPA process for BRAC.

A significant threat to the Meetinghouse historic property is the possibility of an increase in noise levels. The DEIS notably lacks adequate methodologies for noise assessment and abatement and it does not adequately acknowledge the central importance of silent worship to the continued use and viability of the Meetinghouse as a place of worship by its Quaker congregation. It is unacceptable for the DEIS to state that "currently no existing information is available" for the Meetinghouse and Burial Ground, and to merely identify the property as a "noise sensitive receptor" without providing any data, much less analysis of data. "Baseline estimates" and "projected" changes in future noise levels are inadequately explained and, as presented, do not qualify as analysis. To accomplish its purpose, the DEIS should incorporate a noise analysis methodology that would accurately measure existing and future noise levels so that such information can be utilized in decisionmaking concerning all potentially affected areas. In the case of the Meetinghouse, the issue of noise level assessment is critical: if the Meetinghouse is to continue to be viable in its historic use as a place of silent worship, accurate information is needed to ensure that steps can be taken and decisions made that would keep increases in noise levels to a minimum in the vicinity of the Meetinghouse and grounds.

P17.7

Another extremely important issue for the continued use and viability of the Woodlawn Meetinghouse and Burial Ground is that of adequate and safe access for individuals and families of members, attenders, and visitors. The DEIS does not identify or address this issue; however, the implications for continued access to the Meetinghouse are evident throughout the alternatives described in the DEIS. The Meetinghouse, in addition to Woodlawn Plantation, the Jacob Troth House, and other components of the Woodlawn Historic District, is situated within a zone that is treated as a major gateway to the post. Approaching from Route One north of Fort Belvoir, vehicles pass through the heart of the Woodlawn Historic District. All proposals for increased use of this corridor, including modifications to the post's entrance points, would impact the Historic District and its component historic properties. The Meetinghouse is currently accessible only by virtue of

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temporary measures arranged with Fort Belvoir to accommodate changes that resulted from the closure of Woodlawn Road. Its future accessibility is not assured and is not addressed in the DEIS. To minimize impacts to the Historic District, BRAC development should be planned to ensure that expected traffic increases, as well as the measures needed to accommodate such increases, occur in less sensitive areas, such as the Engineering Proving Ground and the GSA parcel.

I appreciate the opportunity to comment on the DEIS for BRAC actions at Fort Belvoir. I also appreciate the opportunity to participate in the Section 106 consultation process for further consideration of approaches to BRAC implementation that would avoid, minimize, or mitigate adverse effects to the Woodlawn Meetinghouse and Burial Ground, and to all potentially affected historic properties. As a participant and consulting party in several other ongoing Section 106 reviews involving Fort Belvoir undertakings, including the Army Museum, the Telegraph Road Connector, the Residential Communities Initiative, the Permanent Closure of Woodlawn Gate, I understand there are many actions that the DEIS is not intended to address, or cannot prejudge or predict. However, in light of the over-arching nature of BRAC, I hope Fort Belvoir will, to the extent possible, coordinate its NEPA and NHPA BRAC reviews with related ongoing Section 106 reviews to help ensure a holistic approach to considering the impacts of these major decisions on historic properties and on the human environment.

Sincerely,

Martha Claire Catlin

Martha Claire Catlin
Historian

P18

Comments
on the

Fort Belvoir BRAC Draft Environmental Impact Statement (DEIS)

Selecting the former site of the Engineer Proving Ground (EPG) as the "preferred" alternative for the BRAC relocation is a serious mistake. On its west side, the EPG is located off I-95, the major U.S. east coast arterial, a regional highway, and local commuter route. Approximately 21,000 people, about the same number of employees at the Pentagon, will arrive to work at Ft. Belvoir – doubling the current number. The EPG has no public transportation services available.

Traffic congestion around present Ft. Belvoir and the entire Mt. Vernon District, severely impacted by the closure of Woodlawn Road to the public, has become "unbearable." The National Capital region has the fourth highest congested traffic in the nation. The current transportation infrastructure cannot serve the BRAC proposals. Ten or more major road improvement projects are proposed to accommodate the increased workforce. Only one of these projects has an identified funding source. Since DOD "does not build roads", there is an unfunded mandate of half-a-billion dollars imposed on state and local governments. It is highly unlikely that the required transportation infrastructure could be in place by the BRAC 2011 deadline.

The planned establishment of the Army Museum at Ft. Belvoir is expected to attract one million visitors each year. The DEIS does not adequately address the impact of this development on the transportation infrastructure related to BRAC.

Serious consideration should be given to relocating the National Geospatial Intelligence Agency (NGA) at the GSA warehouse complex near the Springfield Metro (Blue Line) station. Northern Virginia's elected officials have requested Ft. Belvoir BRAC to utilize the GSA warehouse facility. Use of the EPG however, should be limited to an agency relocation site only.

The EIS estimates increased traffic of 10 – 30% on area roads with a corresponding increase in pollution and decrease in air quality. The National Capital region does not meet the current Ambient Air Quality Standards for ozone and fine particulates. While the EIS identifies some emissions, it ignores other significant emissions that can be expected and concludes that only minor impacts will occur.

The DEIS indicates, Figures 2-3 and 2-4, over 3,000 acres of land that has natural constraints, that are no longer labeled as environmentally sensitive and labels over a hundred acres of Accotink watershed land as "Professional/Institutional." The streams and watersheds within Ft. Belvoir should be accurately labeled and consistent with the protections under the Chesapeake Bay Preservation Act and other Federal law protecting existing streams from the effects of development.

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Land use classifications should retain the environmentally sensitive classification established to protect wetlands, provide wildlife habitat, and protection for endangered and threatened species. DOD should be required to comply with all existing federal, state, and local regulations related to the Chesapeake Bay Preservation Act and other relevant ordinances. Ft. Belvoir's Integrated Natural Resources Management Plan (INRMP) should include a provision requiring coordination with the Virginia Department of Conservation and Recreation, Game and Inland Fisheries, and the U.S. Fish and Wildlife Service.

The Ft. Belvoir Master Plan is not being updated to provide a reasonably comprehensive picture of actions to be taken as a result of the DEIS that proposes to eliminate environmentally sensitive lands and destroy critical wildlife habitat on the Ft. Belvoir post.

The BRAC DEIS lacks the procedural processes that are required under the Administrative Procedures Act and other federal guidelines that require the establishment of a public docket for the review of materials in the Administrative Record.

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P18.5

P19

The Army has released the DRAFT Environmental Impact Statement (DEIS) that analyzes the environmental and socio-economic impacts of changes in and around Ft Belvoir, VA, as a result of the 2005 Base Realignment and Closure (BRAC) Commission's recommendations. Pursuant to any change with the revisit or re-opening of the 2005 BRAC, the following comments are submitted as part of the official public comment period.

P19.1

As a resident of the Springfield area where I live and work, the quality of life within the area surrounding the Ft Belvoir complex to include the Engineering Proving Ground (EPG) will be greatly impacted by the BRAC. The nearly 22,000 new workers that are slated to be relocated to Ft Belvoir will face a 12 hour per day traffic jam with peak commuter traffic seeing a three-hour delay entering and exiting the post. The personnel addition at Ft Belvoir is the equivalent of re-sighting the Pentagon at Ft Belvoir! The key difference is the Pentagon was built more than 60 years ago with the focus on moving ~ 25,000 into the area each day.

P19.2

Being a resident of Springfield and actively involved with the revitalization of the area, one must be concerned with the drain and negative impact BRAC will have on the growth of commercial business development within the central part of Springfield. With three major redevelopment programs on the horizon, the full implementation of BRAC could delay or halt any or all of these projects. With the announcement and beginning of the Springfield Mixing Bowl project, the second largest public works project outside of the Boston Tunnel Project, property values for commuters within a few miles of the Mixing Bowl were impacted by a seven to ten or greater percent reduction in property values that took many years to recover. We in the Springfield area want our community to be a place to go to rather than a place to go through. With the imposed traffic congestion at Ft Belvoir, business and residential opportunities will avoid Springfield for it will be far too hard for these businesses to compete with the facilities on the base. Like the Pentagon and other encapsulated military 'communities' the people who work on-site will eat and stay on site for it will be too hard to travel off base and return in a reasonable time.

P19.3

One reason for the move from current secure locations to Ft Belvoir was the issue of terrorist attacks. Under consideration for development at Ft Belvoir is the building of two bases split by one of the busiest interstate highways in the nation. Interstate 95 becomes a traffic jam and comes to a halt in the morning as well as in the evening. During peak weekend and holiday travel times, it often takes hours to travel less than 30 miles. Splitting the development between Ft Belvoir and the EPG will require duplicate security forces, duplicate fire protection, duplicate fitness and day-care centers as travel between the two facilities would be stalled by either I-95 or the Springfield-Franconia Parkway. The division of forces (and facilities) is contrary to military teaching that goes back thousands of years to the great military philosopher Sun Tzu.

P19.4

If the real concern for the environment is evaluated, then the addition of a southern platform at the Springfield-Franconia METRO and VRE terminal would be an ideal solution. Building a south terminal platform and staying with the Town Center Alternative would allow for the maximum utilization of mass transportation. Traveling south from the new south platform, shuttle buses could travel a newly built and improved road directly from the METRO/VRE into Ft Belvoir without getting onto the Springfield-Franconia Parkway or crossing over I-95. All the current plans for sighting the additions to Ft Belvoir, except the Town Center Concept and not building of a south platform or terminal, forces all mass transit travelers to come onto the Parkway and greatly impacting the current heavy traffic on the roadway. Of each dollar Northern Virginia residents send to Richmond less than 19 cents comes back to area where road improvements are desperately needed as the current transportation networks are choked to the breaking point.

P19.5

The road improvements maps have cut short many of the surrounding areas where road construction is planned or recommended. Several maps that are shown or used at briefings cut short many areas on the northern edge of the EPG grounds where new road improvements or construction is seen. Recommend that the maps more correctly show areas outside the immediate areas of potential use by the BRAC relocations.

P19.6

Keeping all the construction on the east side of I-95 greatly impacts the ability to provide inter as well as intra base transportation. Transportation links could easily be built to handle this type of inter as well as intra base needs. Links to the METRO and other commuter lots or nodes would be greatly improved by using the single base concept. Splitting bases only adds to the mix and doubles the inter and intra base transportation problem. Larger entry and inspection access points could be built verses the need to build more in number for a two base concept.

P19.7

To better support the Town Center concept of development, Davison Army Airfield needs to be part of the new Ft Belvoir build-up. Davison Airfield is a very limited use facility. The Ft Belvoir installation commander has repeatedly referred to the air strip as a VIP or executive use facility. Less than 150 cars can be found on the airfield on any particular day and should it rain that day, the number is cut in half. It is termed a limited use facility by the FAA for it has few navigational aids. The least amount of weather causes the airfield to close to all traffic. As for the field tenants, all could be easily moved to other nearby locations. The DC Army Guard should be moved to Reagan National Airport after all general aviation users were moved from the airport. The Guard's few assets would be closer to the DC National Guard headquarters if relocated to National IAP. The 12th Aviation Battalion could be moved to better serve the Army as their website talks of building clearing after natural or man-made disasters or crowd control at the Nation's Capitol Air Show at Andrews AFB, MD

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and lists few Army related Aviation activities. The VIP and executive traffic could and should be moved to Andrews where a whole VIP and protocol activity is currently in place. All the other activities at Davison could be moved to other parts of the base, Quantico, Andrews, National, or other bases. At a Congressional Oversight Hearing last year, the Assistant Secretary of the Army for Installation, when questioned about the use or potential use of Davison Airfield by Congressman Davis, testified that 'Davison could be used as part of the BRAC relocation to Ft Belvoir if the Army found new locations for the current tenants at the airfield.' The Army installation commander, the folks working the BRAC and others have not fully considered the use of Davison airfield in the BRAC process and should be encouraged to modify the Town Center Alternative for including the airfield. The inter and intra transportation modes to best support the single base concept would be better suited by the construction of a few bridges or tunnels to avoid impacting the civilian traffic on the four-lane section of the Parkway extension currently dividing Ft Belvoir/DLA and Davison Airfield.

P19.8

The reuse of Davison makes for a unified protection plan for Ft Belvoir and avoids the base split by I-95 and the protection of two large operation locations. The reuse of Davison Airfield leaves the EPG section for the Army Museum, a Fairfax County Park, and other Army culturally-correct attractions. Like the Marine Corps Museum at Quantico --- easily seen from I-95, an easily acceptable Museum would greatly improve the number of people who would consider attending the Army Museum. To say that the Army Museum attracts the same type of folks who might be visiting George Washington's Mt Vernon is using some very fallacious logic. The type of visitors to the Army Museum are the veteran, retired and service-associated folks who visit the Marine Corp Museum or the Air Force Museum at Wright-Patterson AFB, OH.

P19.9

In addition to the above-mentioned issues, the BRAC Ft Belvoir have yet to address the GSA Warehouse, Springfield, VA, as a possible location for the new hospital at Ft Belvoir. At the BRAC April 17th Public Meeting, many federal and state elected officials mentioned the relocation of Walter Reed Medical Center not to Ft Belvoir as seen in the BRAC proposal, but to the GSA Warehouse site. Closer to METRO and other transportation nodes as well as the NOVA Medial training site, no one has looked at the hospital relocation options.

John R Sperling
7435 Spring Summit Road
Springfield, VA 22150

P20

-----Original Message-----

From: Nancy James [mailto:nrjames@earthlink.net]

Sent: Monday, April 30, 2007 3:13 PM

To: environmental@belvoir.army.mil

Subject: Comment Form -DEIS

1. Nancy R. James
Religious Society of Friends (Quakers)
home address: 4009 Gibbs Street
Alexandria, VA 22309
703-360-2989
nrjames@earthlink.net

2. I am a member of the Friends Meeting on Woodlawn Road.

P20.1 3. Our meeting house is a cultural and religious resource as well as an historic property. As our worship is primarily silent, increased noise is of great concern to me.

4. I thank you for the respectful attention you have paid to our concerns throughout this process. I appreciate this opportunity to offer my thoughts on the draft Environmental Impact Statement preceding implementation of BRAC at Fort Belvoir.

P20.1 I am most grateful that the preferred site for the Army Museum was first changed from adjacent to our property to the east side of Route 1, and is now at the corner of Kingman Road and the Fairfax County

Parkway. The sounds of helicopters overhead and of guns firing would make our form of worship impossible. Ideally, the Museum would be located as far away as possible from our meeting house.

Placing the Army Museum on the Engineering Proving Grounds, the City Center alternative, would best meet our needs.

P20.2 I note that project #15, "Access Control Point" proposes the placement of a new security gate in what is now a soccer field directly behind our property. Our meeting needs to be protected from any adverse visual and/or auditory effects that may result from this placement.

P20.3 I also have several environmental concerns. Please retain the designation "environmentally sensitive" in your current land use proposal, in order to designate areas needing protection from the effects of development. And include plans for bike paths and facilities in your designations.

Again, my thanks for including Quakers in this seasoning process.
Please keep me informed of developments as they arise.

P21

Jill Frier

From: Patrick Solomon
Sent: Tuesday, May 01, 2007 2:17 PM
To: Jill Frier
Subject: FW: Friends of Accotink Creek Ft. Belvoir DEIS Comments (Mr. Latasa)

From: Philip Latasa [mailto:prl@mail.org]
Sent: Saturday, April 28, 2007 5:28 PM
To: environmental@belvoir.army.mil
Cc: Duane Murphy
Subject: Friends of Accotink Creek Ft. Belvoir DEIS Comments

Friends of Accotink Creek

P.O. Box 12182
 Burke, VA 22009
www.accotink.org
 28 April, 2007

Friends of Accotink Creek Ft. Belvoir DEIS Comments

We are the Friends of Accotink Creek (www.accotink.org), a group of neighbors concerned about the well being of our local watershed. We have initiated projects to achieve that end, including stream monitoring, community cleanups, anti-dumping watch, and storm drain marking.

Accotink Creek flows through the center of Fairfax County. It begins its journey in the City of Fairfax and flows southward to join the Potomac River at Fort Belvoir, passing through the Engineer Proving Grounds on the way. We endeavor to sustain the health of the entire length of this waterway, from origins to estuary.

Much of the area being considered, though not pristine, is now relatively free of disturbance. Its wooded areas continue to provide refuge for native flora and fauna, forestall erosion, recharge our ground water, and perhaps nourish our spirits.

The concerns we have are:

- Reclassification of protected status lands,
- Loss of tree cover,
- Loss of native species habitat,
- Further degradation of already stressed stream habitat and bank erosion due to siltation and permanently increased runoff,
- Increased nutrient load in stream waters due to expanded fertilized lawns and landscaping,
- Spread of invasive plant species both by habitat disturbance and use of non-native landscaping.

The Town Center is the best of the action alternatives in terms of acres impacted, but an option for high-density development of the GSA warehouse, an already paved-over location (also in the Accotink Creek watershed), would best address our concerns.

Other concerns may be partly balanced by:

P21.1

P21.2

- Maximizing use of Low Impact Development (LID),
- Designing to the U.S. Green Building Council's highest LEED rating,
- Stream bank restoration/ sloping,
- Stormwater detention and infiltration,
- Storm drain screening/filtration,
- Anti-litter screening on bridges,
- Use of permeable paving in parking lots, trails, and sidewalks,
- Maintaining and creating natural habitat corridors,
- Preserving maximum existing tree cover during construction,
- All-native replanting,
- Increased funding of invasive species removal,
- Acre for acre replacement of impacted natural resource areas,
- Maintaining or reducing present stormwater runoff totals.

P21.2
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This essay from our website expresses many of our concerns:

Our streams are drowning. We are drowning them with inadequate water management. One of the major problems impairing the health of our streams is, ironically, water itself - a case of too much of a good thing.

Flooding has become only partly an act of nature. Development has multiplied many times over the amount of impervious surfaces in our landscape. Even during routine rainstorms, runoff from roads, driveways, roofs, and parking lots rushes directly down storm drains into local streams, forcing them over their banks, carrying trash, fertilizer, and oil washed off streets and lawns. Natural surfaces with tree cover and sponge-like layers of leaf litter and humus used to allow much of this rainwater to evaporate or seep into groundwater. Now overwhelmed streams, forced to act as extensions of storm drains, result in destructive erosion of streambeds, silt washed downstream to the bay, creeping habitat degradation, and unnecessary flooding of man-made structures.

And what happens after the rain? The water that once would have seeped slowly into the stream has already washed out to the bay. Many streams shrink to a trickle, a fraction of their historic steady flows.

P21.3

If building must take place, let it be an example of the best kind.

The Friends of Accotink Creek look forward to cooperation with Fort Belvoir in any endeavor that can contribute to the health of the Accotink Creek watershed. Please keep us informed.

Sincerely yours,

Philip Latasa

steward@accotink.org

><(((°>.....><(((°>.....><(((°>
"FIND JUST ONE OTHER PERSON WHO CARES."
><(((°>.....><(((°>.....><(((°>

PZZ

-----Original Message-----

From: Tracey Paddock [mailto:tracelpad@yahoo.com]

Sent: Tuesday, April 24, 2007 1:53 PM

To: environmental@belvoir.army.mil

Subject: Bike friendly BRAC.

PZZ.

Please strongly consider implementing bike lanes and other bike commuter-friendly options on/around Fort Belvoir. If we are able to safely bike instead of drive to work, many of us will take that option helping to save the planet and lighten the gridlock.

Tracey Paddock

P23

-----Original Message-----

From: Schroeder, Lee P. [mailto:Lee.P.Schroeder@nga.mil]

Sent: Tuesday, April 24, 2007 7:13 AM

To: 'environmental@belvoir.army.mil'

Subject: RE: Comment form

I was unable to attend the last EIS meeting and remembered some of my comments from previously.

P23.1

I have noticed that the Wood Turtle, a state endangered species, resides in the planned area to be disturbed. What is being doing to protect this animal ?

P23.2

I have also noticed that the American Bald Eagle resides in the planned area to be disturbed. What is being done to protect this national symbol ?

P23.3

There is a great danger of massive sprawl that the federal government will be encouraging. This sprawl will add much more undue pressures on our National Battlefields. What is being done to protect this ? (Just 1 example that has been thwarted by citizen unrest was when Dominion Power announced that their power lines were going to slice through 2 Civil War Battlefields in Manassas. Could there be more citizen unrest to come ?) Our National Battlefields should not be comprimised.

P23.4

NGA has not come up with a telework plan for its worker bees or has not rearranged the workforce so MD people could use the telework plan. Shouldn't this be a priority ?

P23.5

Is this mass move in the interest of "We The People ?" The phrase is printed on many of our \$10 to remind people.

P23.6

Wouldn't this money be better spent to care for the wounded soldiers, protect our borders, or secure our ports ?

Thankyou,
Lee

P24

Jill Frier

From: Patrick Solomon
Sent: Tuesday, May 01, 2007 2:48 PM
To: Jill Frier
Subject: FW: Transportation Concerns about Ft. Belvoir BRAC EIS (MGySgt Gillespie)

From: GGille2607@aol.com [mailto:GGille2607@aol.com]
Sent: Friday, April 20, 2007 4:32 PM
To: environmental@belvoir.army.mil
Subject: Transportation Concerns about Ft. Belvoir

To whom it may concern:

While I live in Springfield, as an Active Duty Marine, I frequently visit Ft. Belvoir for shopping needs, as well as for recreation (I love the nearby Nature Preserve, and just biking around post). Usually, I come by car, but sometimes I come on my bike.

P24.1 As you plan for the expansion of roads on and around Ft. Belvoir, I hope that you incorporate plans for bike use, both for commuting and recreation. Some plans I hope you will include are bike lanes on the entire length of Gunston Rd, to allow for safe crossing over Rt 1, and along Belvoir Rd, as well as having ample bike parking at main locations, such as the commissary, PX, fitness center, and office buildings. The roads approaching Ft. Belvoir could reduce some of the expected delays by having adequate bike lanes to encourage bike commuting. For folks living on or near post, cycling is an activity that can contribute to an individual's improved health, while helping to keep down pollution. If we make it safe and easy, the whole community can benefit. Thank you for your thoughtful consideration of these issues as you plan the upcoming changes in and around Ft. Belvoir.

Sincerely,
Gail L. Gillespie, MGySgt, USMC
7414 Erska-Woods Ct
Springfield, VA 22153



SIERRA
CLUB
FOUNDED 1892

P25

May 1, 2007

Attn: DEIS Comments
Fort Belvoir Directorate of Public Works
9430 Jackson Loop, Suite 100
Fort Belvoir, VA 22060-5116
e-mail: environmental@belvoir.army.mil

Re: Comments on the Draft Environmental Impact Statement (DEIS) for the implementation of the 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia.

The following comments are submitted on behalf of the Mount Vernon and Great Falls Groups, Virginia Chapter of the Sierra Club, with over 7,000 members in northern Virginia. We recognize that the actions of the BRAC have imposed a ridged schedule on the US Army which makes planning difficult, but even in that context, we are disappointed in many aspects of this DEIS. Among our major concerns are the following:

P25.1
1. There is no evidence that the DEIS considers impacts from the contractors, family members and service sector that will necessarily accompany the 22,000 employees that will be added at Belvoir.

P25.2
2. The DEIS seriously understates and minimizes impacts. There are many natural features that are under stress in Fairfax County and the region, including: streams, the Potomac River, the Chesapeake Bay, air quality, tree cover, wetlands and open space. This means that even a small impact on a stressed system can cause major harm and there is little room for absorption. Not admitting the severity of the impacts seems to justify the lack of mitigation, in either action or financing.

P25.3
3. The complete omission of a discussion of energy consumption and the consequent impact on global warming. The Army should recognize that not only are there broad environmental impacts from global warming, but that it has significant national security implications and finally, given its location, the prospect of rising oceans, the Bay and the Potomac would directly impact Belvoir.

It is especially important for the impacts be properly evaluated, acknowledged and mitigated by the Army because as a federal facility, this major development is not subject to local ordinances and citizens are restricted from normal channels of grievance and protection. The other major development occurring in Fairfax County, the expansion of Tysons, is undergoing a full year of planning with citizen participation and a million dollars of consulting support. In contrast, the Army is doing little planning for Belvoir. Expanding on each of the numbered points above:

P25.4
The massive influx of employees into Belvoir will bring a large multiple of others, such as family members, contractors and many kinds of support personnel. For example, no mention is made of the additional schools and their employees or the buses that will be traversing the local roads to serve the families that will be part of the move. The claim that many of the people already live in

the area is not well analyzed or presented. It is difficult to be more specific because not enough information is provided on the numbers of people making a move.

P25.5
An example of a dismissal of an impact is the treatment of air quality. The DEIS makes no acknowledgement of the fact that the Council of Governments must make a determination via a conformity analysis of this activity. The emissions of all criteria pollutants (CO, NO₂, SO₂, PM₁₀, PM_{2.5}, Lead and, possibly, O₃) must be modeled to prove that the project will not "cause or contribute to any new violation of **any** standard" or "increase the frequency or severity of **any** existing violation of any standard in any area. The DEIS makes the simplistic claim that because there will be a decrease of people in the region, the impact is minimal, but that assertion is not established. In order for there to be a net reduction of people in the region following the movement of 22,000 people to Ft. Belvoir, one would have to believe that the space the people left would remain vacant indefinitely, an absurd notion. In addition, localized impacts of emissions which are independent of the regional effects, such as air toxics and particulates, need to be analyzed.

P25.6
Another example of this dismissive posture appears with water quality. The DEIS finds on page 4-217 that seven sub-watersheds already exceed the 25 percent impervious threshold for clean streams. In spite of this, the DEIS offers no mitigation for all the additional impact the expansion will cause, other than a possible study of a stormwater drainage system. There is little indication of coordination with Fairfax County stormwater managers. Finally, we are concerned about the decision to eliminate "Environmentally Sensitive" as a land use designation. Clearly there is significant acreage on Belvoir that would warrant such a classification.

To ignore global warming impacts is a major oversight and weakness of the DEIS. Planners for the BRAC expansion should review all aspects of their plan through the lens of the impact on global warming. A recent study, "National Security and the Threat of Climate Change." By CNA Corp, (<http://securityandclimate.cna.org/>), with a military advisory board of 11 Admirals and Generals, should not have missed the notice of the US Army. The first recommendation on page 9 of the report states that the "national security consequences of climate change should be fully integrated into national security and national defense strategies". Because there is nothing on this topic in the DEIS to respond to, here are some considerations that a responsible plan for Belvoir could incorporate to begin to address this issue.

a) Arrange the pattern of structures compactly to reduce construction and to facilitate the use of transit rather than cars. This will nicely complement the need to maintain security buffers because a cluster of buildings will require less buffer area than the same capacity dispersed.

P25.7
b) Add more employee housing on the base so as to lower the jobs/housing balance and raise the internal capture rate of trips. The J/H ratio on base of the DEIS preferred option is about 3 and a good goal would be below 2.

c) Maximize the use of transit through an aggressive TDM program. The goal of a transit share of 5-10 % may be realistic for 2011, but there needs to be a plan to raise the share to 20, even 30 % over the next 10-15 years. There are many steps that can help implement that, including a more sincere effort to work with local government toward solutions. The DEIS says a transportation demand manager is a possibility, but it is a necessity for one or more. The Army needs to provide support to extend the Metro Blue line to the EPG and eventually, the Yellow line to the Base. Placing the WHS facility at the GSA site will make the Blue line extension

more meaningful and reduce auto trips. Include a good feeder bus system on base. Reduce the amount of parking to save space, money and discourage drivers.

d) Build a complete bike system network, with trails throughout the base, and covered bike stations at all major destinations. Consider providing free bicycles for employees on base, possibly with an electronic check-out system. Hire a bike coordinator.

e) Make all buildings LEED Silver certified or equivalent.

f) Purchase fuel efficient vehicles, even some electric vehicles, at every possibility. Discourage idling of vehicles and heavy equipment.

g) Base facilities undoubtedly will consume substantial amounts of electrical power and other fuels, perhaps natural gas as well as motor fuels. That will result in additional strains on the regions' energy systems, especially the electrical grid, and probably require additional electrical and natural gas transmission/distribution lines with their associated environmental and aesthetic impacts on the region. The consumption of power and fossil fuels will add to regional air pollution, greenhouse gases and pressure for offshore drilling.

Those impacts could be greatly mitigated if the new facilities were to include their own on-site power generation, heating and cooling facilities, especially if those facilities utilized clean renewable energy. Solar energy could provide electrical power, heating, and cooling services. Solar and wind energy could be combined with other sources such as microturbines into a local "microgrid" that would provide 24/7 electrical power as well as heating and cooling ("combined heat and power" or CHP) at each base or even in individual buildings. CHP is inherently more energy efficient even when based in part on fossil fuels, decreasing net greenhouse gas and pollutant emissions and fossil fuel resource consumption. Microgrid configurations would make the base and facilities more independent and resilient in the event of an interruption of fuel or electricity thus increasing security. Modern microgrid controls also contribute to the overall stability and reliability of the regional electrical grid. When combined with renewable sources such as solar and wind, the microgrid greatly reduces air pollution and greenhouse gas emissions. The DEIS should identify microgrid on-site power generation as an alternative that would mitigate adverse impacts on the region.

Sincerely,

Roger Diedrich
Great Falls Group
Virginia Chapter, Sierra Club
3322 Prince William Dr.
Fairfax, VA 22031

Pat Soriano, Chair
Mount Vernon Group
Virginia Chapter, Sierra Club
5504 Barrister Place
Alexandria, VA 22304

C. Flint Webb, P.E.
8308 Westchester Dr.
Vienna, VA 22182-5218

P26

703-560-5203
FHWebb@aol.com

May 1, 2007

Attn: EIS Comments
Fort Belvoir Directorate of Public Works
9430 Jackson Loop, Suite 100
Fort Belvoir, VA 22060-5116
e-mail: environmental@belvoir.army.mil

Re: Comments on Draft General Conformity Determination for Implementation of 2005 BRAC Recommendations and Related Army Actions at Fort Belvoir, Virginia

I am the co-chair of the Fairfax County Federation of Citizens Associations Environmental Committee. In that capacity I am submitting the resolution on BRAC adopted by the membership last October for the record.

My comments concern the Draft General Conformity Determination for implementation of the 2005 BRAC recommendations and related Army actions at Fort Belvoir, Virginia. My comments are my own not those of my employer or the Fairfax County Federation of Citizens Associations.

My detailed comments are attached. My comments can be summed up that this project should not be allowed to go forward due to serious deficiencies in the General Conformity Determination. The applicable General Conformity Regulation (40 CFR 93 Subpart B) (the wrong regulation was stated in the subject document) states:

No department, agency or instrumentality of the Federal Government shall engage in, support in any way or provide financial assistance for licenses or permit, or approve any activity which does not conform to an applicable implementation plan.

Since the Washington Metropolitan Area has been designated as nonattainment of the 8-hour ozone and annual PM_{2.5} National Ambient Air Quality Standards, no SIPs have been approved by EPA for these pollutants, and the estimated emissions are above the precursors *de minimis* emission thresholds for both these standards. Therefore, the project can not go forward without the provisions of 40 CFR 93 Subpart B being strictly adhered to. Specific deficiencies are explained in more detail in the accompanying detailed comments but the deficiencies amount to:

1. The emissions of all criteria emissions (CO, NO₂, SO₂, PM₁₀, PM_{2.5}, Lead and, in my opinion, O₃) must be modeled to prove that the project will not "cause or contribute to any new violation of **any** standard" or "increase the frequency or severity of **any** existing violation of any standard in any area".
2. The emissions did not include many indirect emissions from, for instance to name just a couple, contractors or added electrical usage.
3. The emissions have not been offset by contemporaneous reductions in emissions at other sources in the nonattainment area.
4. The required certifications that must be made by COG and the Governor of Virginia were not included.

P26.1

These deficiencies could have been addressed if the emissions budgets had been included in the 8-hour ozone SIP currently going through public comment but the Army did not participate in the process. The only way to resolve the issue now and continue with the project would be to fully offset the anticipated emission increases by purchasing emission reduction credits (which I do not think exist in the Washington Metropolitan Area) and model the resulting emissions to ensure that **no** NAAQS will be exceeded in the surrounding community. Even though there are no readily available emission reduction credits in the nonattainment area, the Army may be able to satisfy this requirement by reducing mobile source emissions - possibly by subsidizing mass transit (i.e., providing funds to WMATA or VRE to encourage the use of mass transit).

Sincerely,

C. Flint Webb, P.E.
8308 Westchester Dr.
Vienna, VA 22182-5218

Detailed Comments on Fort Belvoir and EPG General Conformity Analysis

Section 1.0, 1st Paragraph, last sentence: The wrong regulation is cited. Since there is no SIP in place the applicable General Conformity Regulation is 40 CFR 93. 40 CFR 51 should only be used when an approved SIP is in place. Quoting from FR 63213, *Determining Conformity of General Federal Actions to State and Federal Implementation Plans; Final Rule*:

In addition, the rule adds a new subpart B to part 93 of title 40 of the Code of Federal Regulations. This is necessary to make the conformity requirements apply to Federal agencies as soon as the rule is effective and in the interim period before the States revise their implementation plans.

Since neither the PM_{2.5} or the 8-hour O₃ SIPs have been approved by EPA this 40 CFR 93 is the applicable regulation not 40 CFR 51. It is worthwhile to compare the O₃ precursor emissions with the emissions budgets from the approved 1-hour O₃ for determining whether the Action is *Regionally Significant* and it would be informative to the public to compare project emissions to the emission budgets in the proposed 8-hour O₃ SIP, but the 8-hour O₃ National Ambient Air Quality Standard.

The main difference with these two regulations is that for 40 CFR 93 there is that if the emissions are over the *de minimis* thresholds the only options would be:

1. The emissions for the Action are "... specifically identified and accounted for in the applicable SIP's attainment or maintenance demonstration" (40 CFR 93.158(a)(1)). The direct and indirect emissions are **not** identified in the Draft 8-hour O₃ SIP, and the PM_{2.5} has not been developed yet.
2. Fully offset the emissions. There has been no attempt to offset the emission increases of this project. Since the project is a General Conformity project it would be possible to offset mobile source emissions by, for instance, contributing to the Washington Metropolitan Area Transit Authority (WMATA) to reduce fares and encourage increased ridership.
3. Demonstrate that:
 - i. The non-ozone precursor emissions do not "cause or contribute to any new violation of **any** standard" **and** will not "increase the frequency or severity of **any** existing violation of any standard in any area" (40 CFR 93.158(b)(2) referred to in 40 CFR 93.158(a)(3)(i)) [emphasis added]. This would require the Army to demonstrate that the direct and indirect emissions from the BRAC action will not cause a violation of the CO, SO₂, NO₂, Lead, and PM₁₀ standard as well as the PM_{2.5} standard to demonstrate that the BRAC action will not cause a violation of, or increase the frequency or severity of existing violations of these standards. When the regulations were originally promulgated in 1993 the state of ozone modeling was not as advanced as it is today and it would be of public benefit to not only model for the other pollutants but also for ozone. Since the Virginia DEQ has been performing extensive ozone modeling of the area it should be possible to use the model inputs from DEQ and add in new emissions from the proposed BRAC action demonstrate that the proposed action will not "increase the frequency or severity" of violations of the 8-hour O₃ NAAQS.
And
 - ii. Virginia direct and indirect emissions will "result in a level of emissions which, together with all other emissions in the nonattainment ... area, would not exceed the

emissions budgets specified in the applicable SIP” (40 CFR 93.158(a)(5)(A)) and “... [are] determined by the [Virginia Department of Environmental Quality], would exceed an emissions budget specified in the applicable SIP and the [Virginia] Governor or the Governor’s designee for SIP actions makes a written commitment to EPA which includes ... (1) A specific schedule for adoption and submittal of a revision to the SIP which would achieve the needed emission reductions prior to the time emissions from the [proposed BRAC action] would occur; (2) Identification of specific measures for incorporation into the SIP which would result in a level of emissions which, ... would not exceed **any** emissions; (3) A determination that all existing applicable SIP requirements are being implemented in the area for the pollutants affected by the [proposed BRAC action], and that local authority to implement additional requirements has been fully pursued; (4) A determination that the [Army] have required all reasonable mitigation measures associated with their action; and (5) Written documentation including all air quality analysis supporting the conformity determination” (40 CFR 93.158(a)(5)(B)) such a letter would require the revision of the SIP within the next 18 months. Since Virginia has just completed the preparation of a SIP that did not include these determinations it is unlikely that Virginia will be willing to make such a determination.

- iii. The COG determines that the BRAC action “is specifically included in a current transportation plan and transportation improvement program which have been found to conform to the applicable SIP under 40 CFR 51 subpart T or 40 CFR 93 subpart A” (40 CFR 93.158(a)(5)(ii) referred to from 93.158(a)(3)(ii)). This would mean that COG would have had to include the emissions from the proposed BRAC action in the most recent transportation conformity determination - **which they have not**. However, the next transportation conformity analysis is expected to include the BRAC action. The project therefore can not be approved until the next transportation conformity determination has been made.

P26.3 Section 3.0, 2nd paragraph after Table 3-1, 2nd sentence: Reference is made to “guidance issued by EPA”. You need to include the reference.

P26.4 Section 3.1, 2nd paragraph, 3rd sentence: The emission estimates must be for the proposed alternative. It is not appropriate to simply state that there would be “Slight variation in the siting [sic] of the new facilities on Fort Belvoir would not change the emissions”. The proposed action includes construction activities at EPG as well as Fort Belvoir. The statement does not address options that would include EPG.

Section 3.1, 3rd paragraph and Section 3.1.3 1st paragraph: It is correct that Major Source New Source Review (NSR) (i.e. Prevention of Significant Deterioration (PSD) or projects that would require Lowest Achievable Emission Rate (LAER)) are exempt from General Conformity, but minor source emissions such as emergency generators and space heaters **are not** exempt from General Conformity.

P26.5 Section 3.1.1.1: No reference to how the list of equipment was developed or how long it will be used is given. Please expand in the text and provide a complete list of equipment for each project in the appendix.

P26.6 Section 3.1.1.2, 1st paragraph: The EIS states that some parameters were provided by COG. Please be specific - which parameters were provided by COG.

P26.7 Section 3.1.1.2, 1st paragraph: The emission estimates only accounted for worker commuting on base. Unless you are planning to provide housing for the workers at the base gate, the direct and indirect emissions would include workers commuting from home to the front gate. They also need to be included in the traffic studies.

P26.8 Section 3.1.1.3: The assumption is made that the painted area would equal the twice the floor area. This would appear to be reasonable for large rooms approximately 32 ft on a side but would appear to under predict the surface area for smaller more intimate rooms. What is the basis of this assumption?

P26.9 Section 3.1.1.3, Table 3-5: Please provide the heated area used in making the assumption for each year. This will allow for better review of the document to ensure consistency with other analyses. The information is provided in the appendix, but it should be included in the text.

P26.10 Section 3.1.1.4, Table 3-6: The table should include the paved area for each year.

P26.11 Section 3.1.1.5, 1st paragraph: What is the basis of the 50% capture factor? Is this based on Best Management Practices? The practices that the Army will be utilizing need to be stated here and in the ROD.

P26.12 Section 3.1.1.5: It appears that demolition emissions are not included in the analysis. Will there be no demolition? If there is any demolition the emissions need to be included in the analysis.

P26.13 Section 3.1.1.5, Table 3-7: Please include the disturbed area for each year in the table.

P26.14 Section 3.1.3: Indirect emissions should also include the emissions associated with the increased electrical power generation needs. The appendix of the draft SIP includes an analysis of the power generating emissions that would be affect the Washington DC Nonattainment Area.

P26.15 Section 3.1.3.1, 2nd paragraph: The heating equipment for the larger projects may be subject to permitting requirements, but I doubt that they will be subject to Major Source NSR or PSD therefore they need to be considered in the General Conformity Analysis. **All** combustion sources will need to be considered in the general conformity analysis unless the emissions will be over the Major Source NSR or PSD requirements. In both cases sources that are subject to Major Source NSR and PSD will go through notice and comment and therefore need not be considered in this notice and comment period except to mention that they will be subject to future notice and comment. Major Source NSR sources will also be required to employ Lowest Achievable Emission Rate (LAER) controls.

P26.16 Section 3.1.3.1, 3rd paragraph: Will the only fuel used on the facility be natural gas? Does that include emergency generators?

Section 3.1.3.1, 4th paragraph: The units are confusing (ft² heated area, ft³ of natural gas, lb of what pollutant ...). Like units should clearly cancel.

P26.13

Section 3.1.3.1, Table 3-9: Please include square feet of heated space for each year in the table.

P26.14

Section 3.1.3.2, 1st paragraph: It is not clear which parameters are from COG and which parameters are assumed in the Mobile6.2 model.

Section 3.1.3.1, 1st paragraph: It is assumed that the average commuting distance is 20 miles. This seems **incredibly** low especially since the average on-base commuting distance given in section 3.1.1.2 was 35 miles. At a minimum the distance should be 35 miles and that would require that all 22,000 new workers would be housed on base (not likely).

P26.15

Section 3.1.3.1: In addition to the direct employees since indirect emissions must be included in the General Conformity you need to include both imbedded and transient contractors and concession workers. I suggest you use the number of entries per year per direct employee as an indication of the number of commuters times the ratio of new direct employees and current direct employees.

Section 3.1.3.2, Table 3-10: It is not credible that an increase of 22,000 employees would lead to a decrease in emissions. You should include the expected emissions from all new direct employees and indirect employees and the current emissions for all direct and indirect employees where the workers are currently stationed. Once both current and future emissions are quantified it would be appropriate to subtract the current emissions from the projected future emissions but the analysis must take into consideration any mass transit commuting that the workers and contractors are currently utilizing. **This analysis did not include enough information in either the text or the appendix to check for adequacy.**

P26.16

Section 3.2, Table 3-12: In addition to NO_x and SO₂ emissions VOC and ammonia emissions should be addressed with respect to the PM_{2.5} Conformity Applicability Analysis since they too could be PM_{2.5} precursors.

P26.17

Section 3.2: Since the proposed BRAC action is over the *de minimis* threshold for in the PM_{2.5} General Conformity Applicability Analysis the emissions will need to be offset since there is no SIP.

Section 3.3.1, 3rd paragraph: The 8-hour O₃ SIP has been approved by the MWAQC so the emissions in the proposed 8-hour O₃ SIP needs to be used for determining regional significance.

P26.18

Section 3.3.1, Table 3-14: It is not clear how many days were assumed for converting from annual emissions to daily emissions. Since much of the emissions are construction related, and construction can not take place year-round it is not proper to simply divide by the number of days per year to determine the ozone season daily emissions and in fact it is

reasonable to expect that most if not all the construction activity will take place during the ozone season.

Section 3.3.2.1, 1st paragraph: The emissions should at least be compared to the MWAQC approved 8-hour ozone SIP.

Section 3.3.2.1, 2nd paragraph, last sentence: This sentence needs to be revised to reflect that the 8-hour SIP has been approved by MWAQC.

P226.19
Section 3.3.2.1, 3rd paragraph: Emissions should be compared to the 2002 base year emissions. The 2002 8-hour ozone precursor emissions budget have been submitted to the EPA (and amended in the draft 8-hour ozone SIP) and should be used rather than the referenced 1990 emission budget.

Section 3.3.2.3, 1st paragraph after Table 3-18: Just because the emissions are considered small doesn't preclude the BRAC action proponent from offsetting the emission increases 100%.

P226.20
Section 3.3.2.3, 2nd paragraph after Table 3-18: The analysis needs to be based on the Fort Belvoir BRAC action on-road emissions not the regional emissions for BRAC as a whole; each facility affected by BRAC must be considered separately - especially in a situation like this where the BRAC actions cover more than one state.

P226.21
Section 3.3.3, 3rd paragraph: In addition to direct employees the analysis is required to include indirect emissions, and this means that it needs to include the emissions associated with contractors.

P226.22
Section 3.4, 1st paragraph: As mentioned earlier the applicable regulation is not 40 CFR 51 but 40 CFR 93.

Section 3.4, 4th paragraph:

P226.23
1st bullet: The statement is not correct since the NOx emissions are above the *de minimis* threshold for both the ozone and PM_{2.5} NAAQS.

2nd bullet: The statement is meaningless since the 1-hour ozone NAAQS has been replaced.

3rd bullet: The statement is meaningless since it is not a General Conformity test.

P226.24
Appendix Table A1-1: There needs to be a list of the equipment for each project, the number of days the project take, and the percentage of the time the equipment is operated during the day.

P226.25
Appendix Table A1-5: The number of days of the project needs to be included and the fugitive emissions from land clearing will take place not only when the land is actively worked but also at night and on weekends when the land is not actively worked. Please include soil properties.

P26.26 Appendix Table A1-7: The number of employees do not match up with other analyses and clearly does not include contractors and vendors; these need to be included as indirect emissions.

P26.27 Appendix Preferred Alternative - Stationary Source Emissions: For reference purposes it would be informative to include the current stationary source emissions from the facility. I believe the figures are included in the 2002 baseline emissions included in the 8-hour SIP.

From Sallie L. Lyons:

As a member of the Fairfax County History Commission it is imperative that I comment upon the Draft Environmental Impact Statement for Implementation of 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia.

The Cultural Resources assessment is so severely deficient as to pose a threat to the resources that the process was created to protect.

P27.1

Archaeological and historical resources must be identified, investigated and made accessible to the site selection process before decisions and development plans are made. This information must inform the selection and design processes rather than be an afterthought when buildings are to be demolished and archaeological sites destroyed in the process of construction.

P27.2

Archaeological analysis and plans for mitigation are particularly weak in the draft EIS. Understanding that location of specific sites can not be made public because of their vulnerability, still greater specificity is in order for sites mentioned as being directly impacted. What is their nature, and how would they be impacted? If sites are endangered what is to be the mitigation? In the case of areas known to have high archaeological potential, what levels of survey and recovery would be planned? There is no discussion at all of how impacts would be mitigated. Preferred mitigation procedures must be included in the document.

P27.3

I find it totally unbelievable that any sort of credible archaeological survey could have been done at the EPG and produce only one artifact. In the rich riverine environment of southern Fairfax County there is not a square foot of land that has not been impacted by man in some way for 10,000 years. There is lithic scatter everywhere. This is not to say that every foot contains a significant archaeological site, but the EPG contains several features that should yield significant archaeological data. Accotink Creek, a good sized stream, traverses the entirety of the parcel, with loops and bends suggesting the likelihood of terraces and pebble beaches. Wetlands would attract hunting, fishing and plant collection. Native Americans preferred these sorts of locations for long term encampments, and streams like the Accotink are generally lined with prehistoric sites for their entire length. Furthermore, since European settlement, this land has been lived on and farmed for from 250 to 350 years. It is very difficult to imagine that a parcel of this size would not include at least one house or barn site, and there is a potential for very early settlement sites.

P27.4

National Archives houses an inventory from Fort Belvoir of photographs and data compiled of structures, mostly houses, that were recorded by the Army after their acquisition and before demolition. They number almost 100. Army maps exist that locate landholdings by former owner. Presence and age of former structures can be determined by title searches in the Fairfax County archives. This kind of research should be done as part of an EIS and inform the selection and design process, rather than after

selection and design of development sites. A new on-site archaeological survey combined with documentary research is necessary to identify and map significant cultural resources at the EPG.

P27.4
(...cont)

Similarly, the GSA parcel is written off as fully developed and therefore archaeologically barren, without any assessment. I spent half a year doing archaeological excavation of cleared areas that had been fully developed urban sites in south England which yielded a warehouse full of earlier artifacts. Slab construction, shallow footings, parking lots, and filled areas can conceal a wealth of untouched subsurface data. Any development that occurs at the GSA parcel must be paired with archaeological oversight.. At the very least, a documentary review and an assessment of potential by a qualified archaeologist should be included in the EIS.

P27.5

The list of impacted properties adjoining or encapsulated within Fort Belvoir has many gaps. While most existing National Register properties and National Historic Landmarks are recognized, there are many historic sites that are passed over and not addressed.

P27.6

The Quaker town of Accotink, over 250 years old, but having its greatest significance for the Quaker mills, shipyards and settlements of the mid nineteenth century, is fully encapsulated by the base. The potential impacts on this unprotected treasure are enormous. The Accotink Methodist Church is recognized in passing, but not its extensive cemetery backing to the old railway site. Numerous other structures in the town, potential archaeological sites, not to mention the identity of the town itself, need to be addressed. The Quakers changed and defined southern Fairfax County. They were early anti-slavery advocates and promoters of education, social responsibility, technology and economic development and their descendents are numerous throughout south county.

P27.7

Lists of potentially impacted historic properties on Mason Neck and environs were spotty at best. Unmentioned in the Belvoir viewshed were Lebanon, a late eighteenth century house in the Pohick Bay Regional Park, and Overlook Farm or Bienvenue, within the Gunston Hall holdings. Both have views of Belvoir across Pohick Bay., both are listed in the Fairfax County Inventory of Historic Sites. The site of La Grange plantation/inn on Old Colchester Road is surrounded on three sides by Fort Belvoir. At the western end of Old Colchester Road is the historic chartered eighteenth century port town of Colchester, currently in process of historic district nomination., Any impact to traffic and changes to register-eligible Old Colchester Road would profoundly impact the old town, which also includes the National Register listed Fairfax Arm Tavern.

P27.8

The great nationally recognized historic properties that would be impacted by the proposed actions are Mount Vernon, Woodlawn Plantation and Gunston Hall. Little is made of the potential impact to these revered properties, and to their viewsheds. Woodlawn had already suffered major damage to its ambiance through construction on adjoining Army property. The administrators of these properties should be allowed to

weigh in on what they consider would be negative impacts to them in the Army alternatives and propose acceptable mitigations, rather than having an EIS that deals in vague guess work.

P27.9
On the mega scale, the renaming of "environmentally sensitive" blocks of land as "community" verges on the totally irresponsible. "Environmentally sensitive" has legal and enforceable ramifications. "Community" is a term that is meaningless. No white wash will alter the nature of these sensitive areas. On page 4-300, Section 4.9.2.1.5, the document states that "an area currently designated as Outdoor Recreation and Environmentally Sensitive would be changed to Community, opening this area to development." The intent of the renaming is clear. This attempt at obfuscation has great impact on cultural resources as well as environmental resources, because prehistoric cultural sites tend to increase in density near streams and wetlands. Such a re-designation is totally inappropriate and unacceptable.

P27.10
In summation, the cultural resources unit of the draft EIS needs to be researched in greater depth and the findings made accessible to the selection process in order to carry weight in the process itself. There must be greater documentary research and a new archeological survey of the EPG and the GSA site. Mitigation for impacts on historical and archaeological sites must be defined. Environmentally Sensitive areas must retain their designation for protection of both environmental and cultural resources.

A more informed process will reduce impacts on irreplaceable cultural resources that are national assets and part of our past and future heritage.

Sallie L. Lyons
10705 Old Colchester Road
Mason Neck, Virginia 22079

703-550-9759

lyonshare@cox.net

P28

-----Original Message-----

From: David Hilde [mailto:David.Hilde@clarkrealty.com]

Sent: Wednesday, May 02, 2007 9:16 AM

To: environmental@belvoir.army.mil

Subject: Fort Belvoir DEIS Comments

Dear Mr. McLaughlin,

We own the property located at 7200 Fullerton Road, which is immediately adjacent to where the Fairfax County Parkway is planned to be constructed.

This letter is a response to the Draft Environmental Impact Statement for the realignment of Fort Belvoir.

It is our understanding that there are two options being considered for how Fullerton Road and the Fairfax County Parkway will interact. The first option would have Fullerton Road stay at grade with the Fairfax County Parkway being elevated over Fullerton Road. The second option would have Fullerton Road being elevated over the Fairfax County Parkway, which would be built at grade.

Elevating Fullerton Road would have a material adverse impact to the ability to access our property, as well as access to the other property immediately adjacent to the opposite side of the Fairfax County Parkway.

Under the option in which Fullerton Road would be elevated, it is estimated that Fullerton Road would be above grade almost the entire length of the frontage of our property. As Fullerton Road is the only access to our property from a public road, we would effectively lose access to our property and the value to our property would be materially adversely affected. Therefore, we request that Fullerton Road remain at grade in order to limit impact to access of our property.

Thank you for your attention to this matter. If you would like to discuss this issue further you may reach me at the contact information provided below.

Sincerely,

David S. Hilde

Clark Realty Capital, L.L.C
4401 Wilson Boulevard, Suite 600
Arlington, Virginia 22203
703.901.4511 T
703.901.0611 F
dshilde@clarkrealty.com

P28.1

P29

-----Original Message-----

From: pcressey@cox.net [mailto:pcressey@cox.net]

Sent: Monday, April 30, 2007 11:05 PM

To: pauline_e_hunter@belvoir.army.mil

Subject: comments on BRAC EIS

Comments on EIS:

P29.1

1. Overall, I have a general concern that both the cultural resource section and the traffic section appear to minimize impacts against all odds that such massive change would have adverse effects. At issue--what are they and how can they be mitigated. It is very important for the Army to use best practices to meet the law/regulations but also to come to the public with full disclosure and recognition of what can happen and what the pledge is regarding mitigations. The public involved in reviewing the EIS are savvy and aware of many basic aspects of EIS study and writing. The citizens are also passionately involved in protecting their quality of life. This does not need to be an adversarial process with the public, but a partnership. It is ultimately the people living around Belvoir, running the businesses, as well the commuters traveling through Belvoir-affected roads and to Belvoir who will be most affected by BRAC. I strongly recommend that these consistencies be pulled together into a series of working stakeholder group on different topics: biological resources, cultural resources, traffic, air and water quality, etc. These stakeholders would receive information, offer suggestions, understand procedures for collecting data and the results, etc. monthly. They would meet jointly once a quarter. There would be a defined process for moving through the EIS and each step of developing and implementing BRAC. In this way, there will be consistency and knowledge--a working partnership that is long-term. I have worked with several such groups in Alexandria as staff, and where it is more time-consuming for staff, I am convinced that the process produces a better result that builds expertise and trust. If BRAC is going to occur, we should grasp it as an opportunity to build a stronger community that brings Belvoir into the larger area.

P29.2

2. In reviewing future documents, I strongly recommend that reports on are put on the web in pieces--chapter by chapter so they can be easily located and printed by the public. It is exhausting to do this from your home commuter or trek to the library and read long documents or spend time and money copying. I really encourage methods that encourage public review and participation.

P29.3

3. Lastly, as an archaeologists I want to comment on the minimal nature of the archaeological section of the EIS. It truly does not meet best practices and does not provide any data from which to draw a conclusion that there will be minimal adverse effect. Even if the specific footprints of buildings or impact areas have not been delineated, general impact areas have. It is necessary to provide lists of all the sites registered on Belvoir as well as surrounding areas of similar topography and history. From this information, historic maps and predictive models it is possible to assess the potential that significant resources may be extant and threatened by the proposed impacts. This is minimal and basic to archaeological Section 106 process. But in this case, when footprints have not been established, it is possible to use best practices--to identify areas of high, medium and low potential, and then propose to survey them. In this way, the goal is to determine where the least adverse effects are and recommend project impact in these locations. Most importantly, this information must be integrated with biological and other EIS results to determine the best ways to build so the most resources are preserved with the least adverse effect to the total environment.

P29.4

4, Lastly, as a daily commuter past Belvoir, I assure everyone that the traffic at peak times is almost at a standstill. I think it is essential that the BRAC EIS and any other reports and policy statements underline Belvoir's commitment to shuttles between the base and metro and that telecommuting be a standard practice--if working at home or from off-site locations can be organized m-f, it may be possible to really reduce traffic in an orderly fashion.

thank you,
Pam
Cressey



P30

Virginia Railway Express

1500 King Street • Suite 202 • Alexandria, Virginia 22314-2730 • (703) 684-1001 • FAX (703) 684-1313
Web Site: <http://www.vre.org> • E-Mail: gotrains@vre.org

April 30, 2007

Fort Belvoir Directorate of Public Works
9430 Jackson Loop, Suite 100
Fort Belvoir, VA 22060-5116
Attn: EIS Comments

To Whom It May Concern:

The purpose of this letter is to provide formal comment to the Department of the Army on the Draft Environmental Impact Statement (DEIS) for the Implementation of 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia.

P30.1

The Virginia Railway Express (VRE) is in agreement with the statement in the DEIS indicating *...the ability of transit to contribute to the mitigation is greater (for the Preferred and City Center Alternatives) than for the other alternatives because these alternatives use sites that are closer to the regional rail network.*

P30.2

However, we disagree with the conclusion, for each of the alternatives, that *Implementation of the BRAC-related projects...would likely not adversely affect use of the rail systems because of the continued lack of direct service.* This is a realistic assessment if no transportation mitigation measures are implemented. However, the DEIS proposes the establishment of shuttle service between the Franconia-Springfield VRE/Metro station and Fort Belvoir employee work locations as part of the mitigation strategy for each BRAC alternative. Provision of connecting shuttle service is a relatively low cost measure that makes existing rail transit (VRE and Metro) a more viable commuting option for Fort Belvoir employees and is likely to attract riders to VRE, particularly those employees living in Stafford County, Fredericksburg and other points south.

P30.3

Several of the proposed bus routes included as mitigation measures operate along the I-95/Route 1 corridor and in western Fairfax County in basically the same operating area as the VRE. New transit services should be coordinated among all transit providers (i.e., VRE, Fairfax Connector, WMATA, PRTC) to maximize the benefits to riders while minimizing operating costs and service redundancies.

- A Transportation Partnership -

Northern Virginia
Transportation Commission
4350 North Fairfax Drive, Suite 720
Arlington, Virginia 22203
(703) 524-3322

Potomac and Rappahannock
Transportation Commission
14700 Potomac Mills Road
Woodbridge, Virginia 22192
(703) 583-7782

P30.4
Additionally, the DEIS relies on the implementation of numerous, unfunded roadway and transit improvements to mitigate the significant, adverse transportation impacts of the BRAC actions. Unless all the roadway and transit mitigation measures are realized, and an aggressive travel demand management program implemented at the installation, congestion on I-95, U.S. Route 1 and other roadways in the vicinity of the Main Post and EPG can be expected to increase. That situation would also tend to make VRE, in conjunction with shuttle service to each site, more attractive as an alternative to driving.

P30.5
Until a commitment is made to funding the proposed mitigation measures and without further information, it is not possible for VRE to determine the potential effect of the BRAC actions on the rail system. VRE's existing service has capacity to accommodate growth in ridership, but it is constrained to a large degree by the availability of parking at outlying stations. Future capacity is also constrained by the availability of parking resources and by the existing operating agreement between VRE and CSX Transportation.

P30.6
The following information regarding Fort Belvoir employee commuting habits is requested to enable a better assessment of potential impact of the BRAC actions on VRE service and operations.

- Number of existing and relocating employees who currently ride VRE
- Number of existing employees who would take VRE, based on their residence location, if connecting transit to their work location were available
- Number of relocating employees who would take VRE if connecting transit to their work location were available

I would also like to reiterate my previous request that any proposals to mitigate BRAC impacts that rely on increased use of VRE be heavily coordinated with our agency.

Thank you for this opportunity to comment. I look forward to continuing to work with the Army as the BRAC planning process continues.

Sincerely,



Dale Zehner
Chief Executive Officer

We're going to begin tonight, our first speaker is Mr. Bob McLaren, and then he will be followed by Larry Zaragoza. Larry, if you want to move down behind Bob or to the mic over here, and with that, Bob, you're up.

MR. McLAREN: Thank you, Don. My name is, as he said, is Bob McLaren. I live at 78 Sanconclaudian Court, that's in Hayfield Farm, and Colonel, I'd like to thank you for not too long ago coming down and addressing our community about BRAC. I am speaking for the Hayfield Citizen's Association, and I'm very familiar with both Fort Belvoir and EPG. I'm retired Air Force. I came here in '76 when I was transferred to the Pentagon, and I still use Fort Belvoir. I also worked with the Army Chem Nuke Agency when I was active duty, and also, I was part of the Citizen Task Force on the public private partnership for EPG a number of years ago.

Now, I'm not going to address traffic issues except very briefly because that's already been fairly well covered. I just want to make three comments. First of all, a bumper sticker my wife saw recently. It said welcome to North Virginia, expect delays.

P31.1 I would like to mention contractors. I am one of those embedded contractors, by the way, that's mentioned there, but what's not mentioned is the support contractors, non-embedded one, and that's a serious flaw in oversight. I would also mention that in the mitigation measures, rail is not considered at all, and that's a serious oversight. It has to be part of the total mitigation transportation package.

P31.2 Moving on to air quality, the EIS really doesn't address air quality at all. It's really hand waving. To state that there's less people going to be moving around because people are moving out and all of the people are staying just relocated, you know, just moving within the area, is a gross over simplification. You've already heard from Delegate Watts that that's really not true, this is going to be an overlay of people on our existing population.

P31.3 However, also, what's not considered is the fact that traffic, delays, more time on the road; these are going to add to our air pollution also. So the EIS has to address both ozone and particulate matter, especially as it affects the local monitors, because that can have an indirect impact on Fairfax County and the fact that we are noncompliance.

P31.4 I'd also like to address the land use plan. I absolutely oppose the re-categorization of environmentally sensitive land. This is removing protection from it and is acknowledged within the EIS. Paragraph 4.6.2.1.1, the professional and industrial community and residential land uses would allow development in areas that were considered environmentally sensitive. Fort Belvoir has normally a positive attitude when it comes to environmentally sensitive areas. I quote, for example, "the formation of the Abbott Wetlands area," and the commitment to the wildlife corridor, although, that's been constrained over past years. So again, that needs to be changed.

P31.5 I also would like to mention in passing that at the EPG there's more than just EQC, Environmental Quality Corridor, that's reflected outside. There's RPA there, which is not mapped, and furthermore, we in Fairfax County recently found our RPA is much more

extensive than we thought it was when we actually went out and looked at our streams, we found many more primary streams, perennial streams, than we thought.

P31.6 There are tributaries that I personally know at EPG that are not in EQC that would be RPA, and speaking about streams, BRAC is going to have significant impact. Even in the draft EIS, there is a number of water sheds that'll have over a ten percent increase in a one in ten year storm events, and they state that these increases can range up to 100 percent. However, my own personal experience, having worked in Fairfax County for many years, is that the models under predict this, and some cases grossly.

P31.7 Furthermore, what's not even considered is the total volume change. Erosion, stream bank erosion, is not only caused by peak flow, but total volume, and with the increase in pervious surface, there will be a substantial increase in total volume.

Now, the draft EIS proposes a great list of mitigation measures for this, you know, I'm really impressed. However, it's (off mike), there is no commitment. There is nothing that allows me to judge and say okay, yes, they're serious impacts, but they're being mitigated and mitigated successfully.

P31.8 Absent that, I would have to rule the EIS as a failure. They said there's going to be serious problems and has not mitigated anything. I would recommend, for example, that you'll have a commitment somewhat similar to reducing the amount of runoff to a naturally forest condition, which is something we're starting to look at here, and some of these mitigation measures that you've mentioned would help satisfy that. I would make one final mention, by the way, I'm going to be submitting written comments afterwards, so I'll be covering this in greater detail, as well as my comments on traffic.

P31.9 There are things you can do outside the areas directly impacted by BRAC to help in the mitigation measures. For example, Davison Army Air Field, stream restoration repairing and buffer, a restoration can be done there. That would help reduce the overall impact in Accotink that's going to be caused by events upstream at EPG.

P31.10 Also, you can look for reforestation at other areas of Fort Belvoir. I mentioned, for example, the areas that are being grubbed on the EPG -- and buffer, a restoration can be done there. That would help reduce the overall impact on Accotink that's going to be caused by events upstream at EPG. Also, you can look for reforestation of other areas of Fort Belvoir. I had mentioned, for example, the areas that are being grubbed on EPG, to locate and remove any unexploded ordnates. A lot of this area does not appear to be proposed for development and this would be a great area to reforest, and I would encourage oak or mixed hardwood in this. Once again, I thank you for the opportunity to comment and good night.

P32

MR. CARR: Thank you, Bob. Our next speaker is Larry Zaragoza. Larry will be followed by Neal McBride if you want to move to the mic most convenient to you. I will remind you as we said in the beginning, I will be showing the cards to help you know how much time you have left, beginning when you have three minutes left, and then we come down to the stop card. If you have comments longer than you think you can do in five minutes, please don't hesitate to submit the written comments, they will carry equal weight in the record, Larry.

MR. ZARAGOZA: Thank you. My name is Larry Zaragoza, I am the Chair of the Environment and Recreation Committee for the Mount Vernon Council Citizen's Association. We are in the process right now of developing our comments and so these are unofficial comments, these are highlights of some of our discussions. In general, we find that the draft EIS really doesn't seem to reflect current knowledge or identify adequate mitigation to compensate for reasonably anticipated impacts.

P32.1 We found this aspect of the document to be poor. The draft EIS really doesn't get to a lot of analysis on the potential impacts and discussion for options on how to mitigate those. It's a long and complex document. We have a number of concerns with this document because it affects our roads, they're already congested, the region is not in attainment for the National Ambient Air Quality Standards for ozone and fine particles, waterways are not meeting water quality standards.

P32.2 One of the problems is that you have all of these projects take place individually and they may have a small impact, but you take projects in a cumulative sense and they have a substantial impact.

P32.3 This is a huge project and even though it does not, in and of itself, perhaps change the ozone standard from being attainment to non-attainment or the converse, it plays a significant role as anything that I can imagine that we have in the region, and I'll get into that in a little bit more detail. In terms of air quality, right now, vehicles already comprised the largest single source of emissions in the National Capital area. The draft EIS presumes that there is going to be a net decrease in vehicle emissions, but yet, we're going to have 2,200 personnel relocated to the facility. There are assumptions embedded in this draft EIS that we just could not understand. If people currently own houses, if they currently rent or whatever, they are going to have things that tie them to their existing residence, and so to assume that they're all going to be moving, particularly in the early stages, seems unreasonable.

P32.4 Secondly, these people are going to be going to already congested roads and the congested roads are going to be further aggravated by the additional traffic. It's also important to realize that additional traffic and congestion is going to have not only an impact on people's commuting time, but from my perspective, it's going to impact air quality, because as you travel at lower speeds, you're going to have more emissions per mile and you actually may have cars running for a longer period. So the assumptions that have been made, in terms of the emissions for these cars, may well be underestimated.

P32.5

In terms of water resources, there are references to, in the beginning of the report, to following applicable regulations. However, the report does not -- the draft EIS doesn't seem to be sensitive to a number of Fairfax County regulations related to Chesapeake Bay Preservation Act and other pieces, and given the water quality that we have in the area, it seems like it's important that we identify those and we follow those just as any other development project in the county would be expected to do.

P32.6

Wildlife, there really does not appear to be a whole lot of sensitivity for the impacts of threatened and endangered species or wildlife in general. In order to maintain the wildlife that we have, it would be important to maintain wildlife corridors so that animals could continue to move in their environment. As you restrict the environment that they live in, we will lose diversity. This is particularly important for threatened and endangered species. Mitigation, it would be good to see more, in terms of mitigation to directly understand how impacts could be addressed. This is true for air quality particularly when you think about the impact of ozone and how the draft state implementation plan that we have that's been released by the Council of Governments is saying that we are a marginal attainment area, and this additional influx of contamination is just really going to aggravate the situation that we currently have.

P32.7

As it is right now, the Mount Vernon district is projected to be one of the areas which is really marginal in terms of making the standard in the future for the eight hour ozone standard, and also, I'd like to echo the comments many others have made, that mass transport, Metro, VRE, really should be critical to maintaining sustainability and relieving congestion that we have in the region.

MR. CARR: Thank you, Larry. Our next speaker is Neal McBride and he'll be followed by Glenda Booth.

MR. McBRIDE: Good evening. My name is Neal McBride and I come from the area where the communities are probably going to be as much affected if not quite as much by the EPG as any other. As I live in the South Run Valley, Pohick Creek Valley, and as it turns out, we're approximately one mile as a crow flies from EPG and about one mile north as a crow flies from the former Lorton prison property, which as you've heard from many others in the past, has become one of the fastest growing areas.

P33.1

As a result, some people as they look at the transportation plan may say hey, there's a lot of need to be done and we've heard this from many politicians and others who've been looking at this. But there are the impacts in the secondary roads, and I'm speaking of specifically the Hose Road Quarter. We're now seeing with the Route 123 completion, that a lot of traffic coming out of Prince William comes up that quarter. Hose Road has not been fixed, it's on a long term plan and I'm probably in the many respects appealing that you and your contractors reach out to the Fairfax County Department of Transportation and VDOT to accelerate raise and ranking status, the need to fix the Hose Road Quarter, as much as anything else, because with the bottlenecks that we've heard, and are not going to be fixed apparently by this EIS projection, along I-95 and Route 1, they're going to come up Route 123, which is what they do often times now anyway, and that obviously impacts my community.

P33.2

Secondly, I am pleased to see that in your EIS draft, you've corrected what I thought was a negative comment made in the February 3rd one where you said the number of new students coming to the Fairfax County public school system is likely to be low, implying that there were no impacts, and I've heard some others say, including our own school department, that oh, don't worry you folks in the south county, you've got plenty of capacity, and then they forget that the BRAC is not the only thing happening in south county. It's the latest implication we have is the Springfield mall will start to see redevelopment, and you know, we can all talk about the many other opportunities for infill. So I'm pleased to see that in your page 520 you recognize that long term adverse effects would be expected to occur on off post schools, but that you also say that building new schools continues to be a challenge because of budget constraints and the rising cost of education. I was in the VA in many years ago and we did have a real federal impact program where when VA hospitals, or clinics, or a military or Indian facilities were built in an area, real money came for impact purposes from the federal government, and not just for transportation, but for schools and cultural resources as well. As we all know, that was killed about 15 years ago and now about all we can rely is possibly this half measure that the federal government is proposing and some of the transportation impacts. So I alert again, that you work with the county and state folks on trying to make sure that they look at the impact of the growth on south county schools.

P33.3

Finally, on a personal note, I used to work, as I said, in the VA and I hear from my friends, since I retired a few years ago, in the VA that there's a growing interest in working with the military facilities on getting an upstanding upgraded, not only military

health care facility, but also to relocate and upgrade the veterans' facilities. We now have a very small clinic on Route 1 and the whole idea for years now has been to put a first class, probably many thousands of out patient visits a year, out patient clinic in concert with the new Army hospital that you're proposing, and again, I hear that from both internal, as well as external VA sources. And as Gerry Hyland mentioned earlier, I 95 think this is an opportunity because, therefore, 10 or 20 years now has been a firm commitment on the VA to work in a joint venture arrangement with all of the military facilities. About ten years ago they passed some laws that made it also much more possible to work with private facilities.

So I see an opportunity here, for many veterans such as my service connected son from Persian Gulf War 1, as well as many others who otherwise have to travel long distances to Martinsburg or downtown D.C. through that traffic. By having this new health care facility accelerated, and I hear there's some effort to try to accelerate the new health care facility that would also help many veterans since they would presume would be using that, in addition to what Fort Belvoir is likely to do to DeWitt. So I appreciate that opportunity. I hope that you'll work more closely with the county and state folks on these other two issues I mentioned, both the secondary roads off the base, off EPG, and making sure they're upgraded, as well as obviously impacting a better response to the school situation. Thank you very much.

P33.3
(con...)

MR. CARR: Next is Gerald Musarra, to be followed by Pat Tyson.

MR. MUSARRA: My name is Gerald Musarra. I'm a retired Army officer and I'm representing basically myself, but also I've spoken with many people over the past four or five months since this has come about, so I guess if I speak in the I, we, please take it as, you know, me and the group. But I appreciate the opportunity to be part of this process, but I want to express my concern, and I'm saying concern of others that I've talked with, and it's talking about preserving the benefits of our military service members. I've been part of the Retiree Council, Fort Belvoir, for about 13 years now.

We always were looking at being vigilant of protecting the benefits of military, so not just the retirees, because as I say if any soldier and their family live long enough, they will enter the retiree ranks and it's up to us to preserve those, and it can be looked at though, as well, okay it's another benefit, I get very, very concerned, I and others, about the fact that what we call upon our soldiers, sailors, airmen, marine to serve this country and their families.

And then to hear statements like well, it's kind of luxuries we can't afford anymore, and specifically what we're referring to is the use of the south nine golf course and then the impact of the Army Museum taking up the north nine, I mean the north 36 or part of that, and I'm saying where's kind of the justice, and you know, that's not always part of the package plan when we're putting out the recruiting bulletins or the recruiting advertisement, you know what I'm saying, you know, are we protecting the benefits.

The military service is a special way of life and in my opinion, it requires special treatment of our soldiers and their families like forever. It's not a normal situation and I get very concerned when it talks about well, we really don't need this anymore because we have a global war on terror. Well, we have a global war on terror then, you know, we fund it, you know, and you know, I don't know what the total answer is, but I'm saying as long as this is part of the process, then I think I just want some specific sensitivity that it doesn't just lop things off the table. Put it some place else.

If a BRAC has to come upon us and we know that that's a big move, it's like a meteor coming towards Earth, I'm not so sure we have to, you know, look at it because there's no dominoes as we've noted tonight and for the past year and a half that are falling into place, but that is another issue. I'm not here to talk about that. I'm just concerned that we keep the issue that the Army takes care of its own, and to -- we have to preserve every benefit, and in my opinion, even add benefits for what we're requiring soldiers to do and their families. We have infantry divisions that are on their second or fourth tour back to Iraq and Iran and that's never going to stop, and I said I don't, you know, it's quite unfair that whenever BRAC and anything else is superimposed on the military, that it requires dismantling and disassembling benefits that are for the family either now, and the soldier and their family either now, or long into the future. Thank you

P34.1

P34.2

MR. CARR: Next speaker is Pat Tyson, to be followed by Norm Starler.

MS. TYSON: Hi, Patricia Tyson. Thank you very much, sir, for this opportunity to speak with you tonight.

P35.1

I wanted to endorse the comments of Supervisor Connolly. I think that was very thorough review of the inadequacies of the draft EIS in supporting the proposed land use revisions. So I won't go into all of the detail that he did, but it's important that you take note of those and his pointing to you that there are several non-BRAC projects that have been swept into this process that do not belong here and should be removed. That includes the travel RV camp, I'm not quite sure what it is, but it's not a BRAC project.

P35.2

As a reader, I want to say I had a lot of difficulty understanding the impacts of the projects on the environment. I think people have spoken very eloquently about the transportation and infrastructure needs and I'm not going to repeat those, but on the subject of impacts to the natural resources, I had a hard time understanding where the impacts would occur, and to what resources they would occur, and from what aspects of the project.

So I suggest that the draft EIS be completely revised to make this clear to all of the readers and to the public, exactly where those multiple impacts are done, and as you probably know, both NEPA and CEQ regulations require that the agency review all of the mitigation that is possible of the environmental effect from these projects, which is not in the document.

P35.3

There are many assertions that there are minor or moderate impacts. Those are not defined, it is not clear why that analysis resulted in that result, I just don't understand, and I have a good example of that which is the water shed impacts in EPG water sheds 53, 54, and 55 are shown to have pretty major impacts, but in fact, that doesn't in any way coordinate with where projects are located. So it's not clear why there would be impacts to those water sheds.

P35.4

An example is its not clear whether those projects have impacts to -- is impact construction, utilities included, roads, grating, you know, the real meats and bones of a construction project not clear at all, and I hope the public hearing knows that being a federal installation, obviously the post is exempt from state and local Fairfax County regulations. So this raises a lot of concerns about the lack of mitigation.

P35.5

Essentially, the draft EIS is asking the public to endorse them not breaking any federal law in doing the project, and it does not offer anything further than that. So we'll be looking at the rod to have specific mitigation that's enforceable, because we do expect you to do it better than the worst it could possibly be, short of breaking the federal laws. And we heard a couple of people tonight offer to be stakeholders and to participate in helping you identify good and necessary mitigation. I offer myself, I know there are a couple of other people, and I think that many kind words have been said about your coordinating with the community. You can follow through and make sure, either direct

P 35.5
Continued

your staff or your consultants to work with the community and those stakeholders who'd like to assist you in this effort, and I thank you for your time.

P36

MR. CARR: Next speaker, Mr. Norm Starler, to be followed by John Hurley.

MR. STARLER: Good evening, Colonel. Thanks for sitting through all of this, I know it's been a long night and I guess it's been a long night for a lot of other people too.

P36.1

I'm going to take off from Gerry Musarra's comments about the loss of golf course facilities at Fort Belvoir, and it's kind of hard to bring this up on a night that we're thinking about what's happened down at Virginia Tech, and you know, but nevertheless, the one aspect that I would bring up is that there are community -- the golf course is a community resource. The green space provided by the 45 holes of golf courses provides green space, keeps the air cooler for the community at large. So it's not only the active duty military, the retired military, and the DOD civilians that enjoy the recreational space of the golf course, but the community as a whole benefits.

Also, when you bring 20,000 more people, there's going to be a demand for golf course recreation. I think the EIS implies that picnic tables and swimming pools and maybe pool tables can substitute for golf course recreation. I don't think that's adequate mitigation. Other folks have talked about mitigation, and so it seems to me that there ought to be a way to construct the facilities that you need to construct to meet the needs in a way that takes advantage of the green space provided by the golf courses rather than eliminating them. Thank you.

P37

MR. CARR: Next speaker up is John Hurley, to be followed by Frank Cohn.

MR. HURLEY: Thank you, Colonel, Deputy Commander, Sergeant Major, and Mr. Carr. I'll make my comments brief. Ms. Hurley, Ellie and I live at the corner of Cherry Tree Drive and Route 235, and our concerns relate to the number one, the traffic impact that would be created by essentially plus 20,000 commuting day workers to and from Fort Belvoir, and secondly, the impacts that have been very well, in fact better describe than I would, on wildlife and the environment, particularly as a great deal of residential construction going on as we speak at Fort Belvoir with massive clear cutting of historic timbers, some of them going back 200 years old.

P37.1

P37.2

It's not just on the prior foot print of existing barracks and housing, but a rather serious problem. The Mount Vernon, as Supervisor Hyland has indicated, is very dynamic. There are improvements underway and expansions at Mount Vernon Estate.

P37.3

We have a number of schools here, the high school, and three elementary schools very close to 235. The closure of Woodlawn Road and the likely replacement, again, creates a strain. So our concern is one very simply of overload of particularly the birds.

It's a bit rye that on one hand we have federal wildlife refuges, on the other side, and then at the same time, we'll be doing major construction. So we thank you for the opportunity to comment and we hope that whatever needs to be done can be done with minimal impact on the neighborhoods. Thank you.

P38

MR. CARR: Next is Sallie Lyons, to be followed by Gerald Lyons.

MS. LYONS: My name is Sallie Lyons. I'm a member of the Fairfax County History Commission. I live in Mount Vernon district and the 18th century tobacco port of Colchester on Mason Neck.

The draft EIS is completely deficient in its assessment of potential impacts on cultural resources. That is to say on archeological and historic sites. It contains little information concerning non-archeological and historic sites and informed decisions cannot be made without information.

P38.1

It needs to reference the Fairfax County inventory of historic sites, the county's archeological resource list, the list of sites eligible for or listed on the National Register of Historic Places, National Historic Landmarks, and other archivally recognized sites potentially impacted by the proposed changes at Fort Belvoir.

This part of Fairfax County is one of the richest in historic resources in the nation. People have lived on this land for 10,000 years and prehistoric sites are dense in this part of the county. The homes of two founding fathers are within the Belvoir view shed and we would be directly impacted by anything that occurs on south post. First President George Washington's Mount Vernon, a national shrine, lies within its view shed. Gunston Hall, home of George Mason, father of the Bill of Rights, over looks Belvoir. National registry property, Woodlawn Plantation has already been negatively impacted by earlier changes at Fort Belvoir. The plantation of Thomas Lord Fairfax, the father of Fairfax County, of the name of Belvoir, lies within the base and gives it its name.

P38.2

The historic Quaker town of Accotink with its milsights (?) and the friends meeting house are surrounded by Fort Belvoir. Furthermore, there are over 100 farm and home sights, some very old, recorded in the National Archives by photography and map location that were destroyed in the acquisition of land for Camp Humphreys and Fort Belvoir. These need also to be referenced as potential archeological sites within the document. Before any decisions are made concerning placement of developments, it's imperative that the information indicating the scope of existing knowledge of historical and archeological sites be assessable in the EIS study.

There is no minimal impact to destruction of cultural resources because of poor planning that would result from ignorance is not minimal impact. The EIS should include a list of non-historic and archeological sites within and adjacent to Fort Belvoir. To this end, I would recommend you work with the Fort Belvoir base historian, the Fairfax County Department of Cultural Resources, the Northern Virginia Chapter of the Archeological Society of Virginia, and the Virginia Department of Historic Resources.

P38.3

You should also communicate with the administrations of Mount Vernon Plantation, Gunston Hall, and the National Trust for Historic Preservation, and recognize their concerns in the document. Impact on cultural resources will only be minimal if planning decisions are informed by knowledge while they are being made. Thank you.

P39

MR. CARR: Thank you. Our next speaker will be John Sperling, to be followed by John Pellegrin.

P39.1 MR. SPERLING: Thank you. I'm John Sperling of Springfield. I have two concerns, one of which is the pending redevelopment of Central Springfield might be drastically impacted by this BRAC and the proposed building at Fort Belvoir. I want to see Springfield to be a place that people drive to rather than drive through and with the congestion that's potentially forecast under the BRAC, I think that it could drastically impact the area.

P39.2 Second, as a resident of the area now, living right outside Fort Belvoir, I'm concerned and hopefully it will not be replicated, but the drastic drop in property values when the Springfield Mixing Bowl started, everybody was concerned about how that would impact traffic and the property values drastically reduced as I moved from one part of Springfield to another.

P39.3 Given all of these factors, I guess I'm concerned that we want to do the equivalent of dropping the Pentagon in the Fort Belvoir area and build 6 million square feet of office space in less time that we did the Mixing Bowl at the Springfield interchange.

P39.4 One of the reasons it was given for doing this BRAC was to consolidate for security reasons, and I guess our main concern that we want to build two bases at Fort Belvoir, one on one side of 95 and the other on the other, and therefore, we're going to end up with two fire departments, two police departments, two day care centers, two gyms, et cetera, and have a redundance and a repeating effect on both sides of the base, and in September the Assistant Secretary of the Army for installations offered at Davison Air Field, for potential consideration and said if we could find another place for it he would consider giving up Davison Air Field, and I think Davison Air Field should be a strong contender for using the revitalization or the rebuilding of the BRAC, and it's been somewhat neglected.

P39.5 I know the Army has been the less then forth coming with the movement of aircraft in and out of Fort Belvoir and Davison Air Field, and even tonight I was told that Davison Air Field is considered a VIP executive airport, and I don't know if we can afford those kind of luxuries given the drastic impact on the local economy and the local constituents of what this move and consolidation at Fort Belvoir could be given. No matter how you come and go under the new program, you're going to have to come up from the Metro and go either east or west on the parkway and it'll drastically impact a lot of us in the neighborhood.

P39.6 Even a consideration of building this south platform of the VRE or at the Metro and coming down the backside of 95, on the east side of 95 rather, would greatly facilitate the move rather than coming up on the parkway and going east over the EPG or going west down into Fort Belvoir. I think those are the kind of considerations that we need to look at as far as maximizing the use of mass transportation.

P 89.7

Again, there seems to be a lot of lack of concern for the local constituencies outside of Fort Belvoir, and I remain concerned about how we, as citizen, and people that use Fort Belvoir and also live outside of Fort Belvoir are going to be impact with this potential move. Thank you.

P40

MR. CARR: Thank you, Frank. Next is Mark Gionet. Am I saying that correctly?

MR. GIONET: Close, very close. Mark Gionet, thank you --

MR. CARR: Mark Gionet will be followed by Monica Thompson.

MR. GIONET: -- Mount Vernon highway.

First, sir, thank you very much for being here this evening with your staff. I think that this must be the assignment of a lifetime and we hope it all ends well. I'd like to thank Supervisor Hyland for hosting this. I'll keep my comments to two basic areas, transportation and land use, they're my chief interest in this as a resident and observer.

In what might be considered a bit of transportation planning irony, on the other side of the county this evening, as part of the county's plans for redoing Tyson's Corner, Doctor Robert Savaro from the University of California is speaking, and he is probably one of the most nationally recognized experts on transportation planning, and Doctor Savaro came up with the notion of the jobs housing imbalance, which is, I think what 22,000 people are going to discover when they realize their job has just moved.

P40.1

So this is as a cause of major transportation congestion, and what that points to is that the county has, for Tyson's Corner, and when Metro goes to Tyson's, come up with a desire to really have a nationally recognized solution to the problem, and that's really what we need here is a national class solution to transportation issues, and it must include transit, it must include that commitment to, you know, HOV lanes, it must include transportation demand management, all elements that have to be worked into this EIS in much better form.

P40.2

I would concur with the Secretary's earlier recommendation of transportation, that there be no record of the decision until all of these 13, and then I would have the 20 that Frank just mentioned, projects are, you know, identified, funded, and locked into place so that they are known things.

P40.3

I would also say that I agree with the previous suggestion that's made, that there be a real -- as part of the mitigation measures, a time table be included, that no jobs be moved until the improvements were in place, to accommodate those people going to those jobs, and finally, I think under transportation, though it falls into land use as well, the use of the GSA Warehouse should be considered, because that really seems to provide the clearest way to have to ready access to Metro, unless somebody can think of a way to have ready access to Metro.

P40.4

Under land use, decoupling this change in the land use plan for the installation from the BRAC process, I really disagree again, with -- as many others have done, with the consolidation and to catch all land use categories. That does not seem to make good planning sense in a narrow, and most planning documents that are certainly done by the county and elsewhere, really seek to provide as much detail as possible to let people

understand the vision of what's being planned, and that does not seem to be the case here.

P40.5

Issues of air quality are not well addressed. Issues of water quality are not well addressed. That's all been stated before.

P40.6

So in closing, I, you know, I think it's a good start, but it needs a lot of work yet, and we wish you the best of luck in that. Thank you.

P41

MR. CARR: Next is Monica Thompson, to be followed by Yolanda Nicholson, please.

MS. THOMPSON: Thank you for this opportunity tonight. My name is Monica Thompson. I'm a community resident. I'm also a former soldier that left out of Fort Belvoir, so my perspective on this whole issue is very broad. I understand the needs of each stakeholder. We already had someone speak about creating a committee of those stakeholders who could, you know, come in and make sure everybody from that stakeholder group's perspectives are represented and issues are raised.

P41.1

My question is, or my concern is, with the influence of so many people and the sensitivity of that influx in where we are, as far as our nation is with the war on terror, has there been much attention paid to the vulnerability or the risk that we're going to take on with so many soldiers and people, or civilians, moving into this area. What is the level of risk that we're going to take on and what is the mitigation to that? Has that been discussed? With this war on terror and so many people being in this area, and what Belvoir means to us. So the security and the safety of the residents has increased with so many people coming into the area.

P41.2

The other thing was, as far as being a community person, a resident, I'm also a small business owner. Have small business owners been included in the planning and execution of this whole thing, because it will impact us. Thank you.

P41.3

P42

MR. CARR: Very good. Thank you. Yolanda Nicholson.

P42.1 MS. NICHOLSON: Hi, I'm Yolanda Nicholson. I'm a citizen of the area. I came to listen, not to speak, but I keep seeing in my mind the old TV commercial where the Native American has a tear running down his cheek because of what's happening to the environment.

P42.2 We're further down that road than we were. Undeveloped forested land is one of Fort Belvoir's greatest public resources. It is virtually irreplaceable if lost. In a time of disappearing natural resources, it is vital that green spaces be retained. Any plan that develops with the remaining space, should disturb the minimum number of wooded acres. Preserving these spaces is vital to the quality of life, and in fact, the very ability to sustain life. Fort Belvoir's green spaces are truly a national treasure. Please do all possible to retain them.

P42.3 I think that I shall never see a poem as lovely as a tree, providing quite, peaceful space to preserve a sense of sanity, a home of wildlife, an air cleaning factory, and erosion control.

Think twice before clearing or even opening any land.

PUBLIC MEETING FOR THE ENVIRONMENTAL IMPACT
STATEMENT FOR IMPLEMENTATION OF 2005 BASE
REALIGNMENT AND CLOSURE (BRAC)
RECOMMENDATIONS AND RELATED ARMY ACTIONS
AT FORT BELVOIR, VIRGINIA
STATEMENT OF EARL FLANAGAN
ALEXANDRIA, VIRGINIA
TUESDAY, APRIL 17, 2007

MR. FLANAGAN: At the earlier briefing of the Mt. Zephyr Civic Association I attended, the briefing was by Colonel Lauritzen, and one of the questions or one of the statements he made at the meeting was that there would be one parking space provided for each of the 22,000 new employees. I recommended or asked him if they were going to have a Transit Demand Management System, TDM, what they call a TDM, Transit Demand Management System, and he said that he knew that they might do that but he wasn't too sure. And I see now that they have in the Environmental Impact draft a section calling for the development of a Transit Demand Management activity. But I want -- they are still proposing in the draft EIS one parking space per employee, and all that does is to encourage single occupancy vehicles, because if you have got your own parking space, I mean, why use public transit or why do car pooling?

They need, this EIS, needs to have in it the outlines of a plan that will dissuade or there should be a purposeful plan to dissuade single occupancy vehicles such as single occupancy, all the single-occupancy vehicles would have to park out of doors in the rain, in the snow and have to remove all the sleet from their windshields. This prompts -- and then all the carpools will be indoors, where it is heated and their parking spaces are right up there next to the entrances.

There has to be a plan at least sketched out in the EIS that says how they are going to dissuade single-occupancy vehicles.

And then there should be a requirement. I'm surprised if there isn't an Executive Order. That you can only provide 80 percent of parking for 80 percent of your employees or something like that.

There are other aspects of the EIS that I would like to make comments on, but I think this one in particular, the proposal that's in the EIS, is just, I don't know any way of describing it except repulsive. This is the most repulsive statement I have ever read in an EIS, proposing to park or to plan for one parking space per employee, just repulsive. And whoever prepared this EIS for the Department of Defense -- I hope it wasn't your firm -- anyway, the Department of Defense has been snookered. I mean, they have really been -- this is, this EIS is full of maybes and ifs and wouldn't it be nice to and all those kind of motherhood statements that are not worthy of the Federal government, in my opinion, and particularly the Army, which I'm a veteran of, and I don't think they should be doing this, hoodwinking the public. It appears to be a definite exercise to hoodwink the public.

P43.1

P43.2

P44

PUBLIC MEETING FOR THE ENVIRONMENTAL IMPACT
STATEMENT FOR IMPLEMENTATION OF 2005 BASE
REALIGNMENT AND CLOSURE (BRAC)
RECOMMENDATIONS AND RELATED ARMY ACTIONS
AT FORT BELVOIR, VIRGINIA
STATEMENT OF NEWMAN A. HOWARD
ALEXANDRIA, VIRGINIA
TUESDAY, APRIL 17, 2007

MR. HOWARD: My name is Newman Howard. I'm a retired Colonel, Corps of Engineers, former District Engineer for the Norfolk District.

In 1975 through 1978, I was associated with a number of Environmental Impact Statements and Environmental Assessments, including Craney Island, and the primary one being the proposal to build a refinery in Portsmouth in the Norfolk Harbor.

During that period of time, I was the Harbormaster for Norfolk, Portsmouth, Newport News and Richmond. The only comments I would like to make are primarily technical aspects of the Environmental Impact Statement.

P44.1

I tried very hard in reading the Environmental Impact Statement to follow the rationale and the analysis of the individuals putting this statement together. My problem with the statement is it appears that the contractor farmed various parts of the statement out to different teams and they went off to do their analysis independently, and in all aspects of the Environmental Impact Statement, it is supposed to be a road map to where the proper ending should be. The road map of this Environmental Impact Statement is fraught with inconsistencies and what I consider inadequate analyses. If you try to follow the maps of the Environmental Impact Statement from one section to another or one table to another, the color coding on the maps will change without warning to the reader.

In addition to that, the designation of the various facilities to be used within those color-coded areas will change in nomenclature, further confusing the reader. This troubles me from the standpoint that this particular Environmental Impact Statement is very important to all the residences of this part of Northern Virginia, and inconsistencies of this type serve to discredit the credibility of the entire impact statement.

I don't think that adequate consideration was given to many areas, particularly the hospital. I state one case on page 1-9, under Land Use.

P44.2

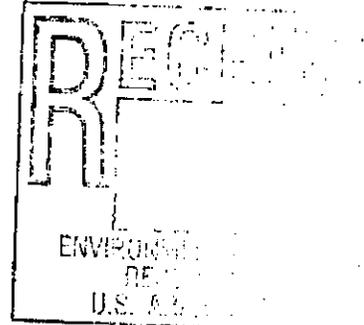
This Environmental Impact Statement considers the Engineer Proving Ground as a potential site for the new hospital. However, this proposal is categorically dismissed purely with the statement that a hospital located in this location would be too difficult to find. This, to me, is amateurish at best. I have pages of other inconsistencies, however, the more you write, the less people read, so short, sweet, this is my opinion, and I have other areas that I could discuss if anybody was interested. Thank you.

P45

**The Towns at Manchester Woods Homeowners' Association
c/o Service First Management & Consulting, Inc.
12084 Cadet Court
Manassas, VA 20109**

April 30, 2007

**Attn: Mr. Patrick McLaughlin
Fort Belvoir Directorate of Public Works
Building 1442
9430 Jackson Loop
Fort Belvoir, VA 22060-5116**



**RE: Comments on Draft EIS for BRAC Process at Fort Belvoir
from the Towns at Manchester Woods Homeowners Association**

Dear Mr. McLaughlin

The Homeowner's Association (HOA) of the Towns of Manchester Woods (TMW) respectfully submits the following comments about the Draft Environmental Impact Statement (DEIS) for the Fort Belvoir (the base) Realignment:

Summary

While mindful of the statutory requirements for the realignment and increase of operations at Fort Belvoir, the HOA believes that the plans set forth in the DEIS are inadequate to prevent unreasonable disruption of the lives and living standards of the residents of TMW and other communities surrounding the base. In particular, plans for development of the Engineering Proving Ground (EPG) contemplate road improvements and changes that cannot possibly be completed in time to support the planned influx of workers at the EPG under the DEIS Preferred Alternative or the City Center alternative. The road plans appear to be insufficient and inadequate because they cannot possibly accommodate the huge increase in drivers the DEIS expects. More importantly, none of the proposed road plans is funded. The fact the road plans are unfunded is our greatest concern. Under either the Preferred Alternative or the City Center Alternative, the DEIS forebodes a future for TMW residents that is fraught with gross-inconveniences from local traffic congestion and constant struggles to gain access to their homes.

I. Area-Wide Transportation Issues

A. BRAC Needs to Ensure Transportation Funding Is In Place Prior to Move

The DEIS describes a variety of alternative sitings for the influx of personnel and agencies to Fort Belvoir under the BRAC realignment plans. All these alternatives describe massive displacements of traffic in and around the Base and the neighboring communities. Each alternative purports to describe road improvements and changes to ameliorate the traffic increases. However, nearly all of the described road plans have one thing in common; they are not currently funded by the Army, the State of Virginia, or other agencies of the Federal government. Even if the described road plans might

P45.1

eventually be adequate to improve the traffic congestion from the base changes, it is highly unlikely that funding for road plans will be in place for the planned moves to Fort Belvoir in 2011, much less in time for the road construction to be completed by 2011. Without timely funding and construction completed before the planned move-in dates, not only will the road congestion around the base be horrendous until the road improvements are completed, but the construction process will make it immeasurably worse.

Despite the statutory requirements of BRAC, no alternative for the realignment should be approved without funding being in place and plans set for road construction to be completed before large numbers of personnel will move to the base. If there is a legal impediment to this common sense approach to BRAC planning, Congress should be asked to both extend the time for completion of the BRAC moves and to fund the needed road projects.

B. BRAC Needs to Present a Workable Plan for Dealing with Traffic Congestion

The HOA notes that no matter which alternative is approved and despite any road improvement and changes suggested for each alternative being contemplated, road congestion around Fort Belvoir and the adjacent communities will be greatly increased during peak travel hours. The HOA does not believe that the DEIS proposes adequate amelioration of this traffic congestion. Traffic in all of Northern Virginia is already unacceptably congested and if complicated by the addition of any of the DEIS proposals, traffic congestion around the base will only worsen. Further, the solutions proposed in the DEIS are inadequate in terms of presenting workable alternatives. Nor does the DEIS suggest from where the necessary funds to ultimately fix the congestion will come. The move of so many personnel to Fort Belvoir will create monumental traffic problems, for which the Army has no sure answer. This plan should not be approved and construction begun until these problems are completely addressed and the solutions properly funded.

P45.2

II. Engineering Proving Grounds (EPG)-Specific Issues

The TMW development backs up to the EPG, so we have a greater interest in plans to utilize the EPG than in plans for projects on other parts of Fort Belvoir. Under either the Preferred Alternative or the City Center alternative, large numbers of personnel will be moved to the EPG. The comments below are directed at both alternatives, because, despite differences in the locations of various agencies under the two alternatives, the impact on the TMW will be very similar. New roads and entry points for the EPG will be built under both alternatives and the difference in impact on the lives of TMW residents will be one of degree, but not of significant substance. If asked to choose between the two alternatives, the TMW HOA would prefer the City Center alternative, as it will site fewer personnel on the EPG and will provide much better access to mass transit for agencies sited in the GSA area, but the disruption to the TMW will be significant in either case.

P45.3

A. Traffic Congestion Increased

The influx of 17,700 to 11,700 personnel to work on the EPG will create traffic congestion on the roads around the EPG, including the area around the TMW, to an extent which may well make TMW residents virtual prisoners in their homes during peak traffic hours, unless they are willing, or have, to brave interminable waits on the exit roads. These same residents will be exiled from their homes, when they want to return home in the evenings. The exit to the Franconia-Springfield Parkway from TMW already backs up and is congested in the morning. With opening of the EPG to several activities and the move of access to the parkway for TMW to Neuman Street, exiting the neighborhood will become much worse (for one major reason, see the next paragraph). Even in the unlikely event that the planning for traffic around the EPG might ultimately be adequate, we renew our objection that there is currently no funding for many of these improvements and that no moves should be undertaken until all the road improvements are funded and their construction completed.

P 45.4

B. TMW Highway Access Severely Restricted

As envisioned by the DEIS, traffic from TMW will be re-routed from Hooes Road into the Bonniemill Lane neighborhood to get to Neuman St. Neuman St. is to be turned into a busy four lane thoroughfare for access to the EPG from the Parkway. To exit the Bonniemill Lane Neighborhood, TMW residents will constantly have to compete with thousands of EPG employees on Neuman St. for access to the Parkway. The blocking of Hooes Rd. at Neuman St. will greatly increase local traffic on the side streets in the local neighborhoods, decreasing safety for local children. The DEIS plans in this regard take no account of these issues for the EPG's northerly neighbors.

P 45.5

As mitigation of some of this issue, the TMW believes that the Hooes Rd access into Beverly Forest through Constantine Ave. should be reopened. With the other roadway changes, Parkway traffic will no longer be tempted to take this route as a shortcut, but it would greatly improve access for TMW residents. It also might be appropriate to provide additional access to TMW through Norman Pl. from Bonniemill Lane.

C. Boundary Setbacks

The DEIS contemplates that BRAC construction will be at least 400-800 feet from existing homes. The TMW believes that 800 feet should be the minimum separation between homes and EPG construction. This might be accomplished by ensuring that there is no construction outside the internal loop road envisioned on the tentative EPG planning maps. We would ask that as big an area as possible of natural woodland be preserved between TMW homes and the new facilities on the EPG. Some sort of recreational use preserving the natural habitat might be put in this area, i.e. - walking trails.

P 45.6

D. Construction Noise and Scheduling

Because of the TMW neighborhood's proximity to the EPG, we ask that construction on the EPG be limited to Monday through Friday with work hours not to exceed 0600-1800 hrs. Any greater work period will severely adversely affect the rest and relaxation of TMW residents.

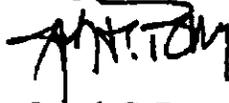
P45.7

E. Displacement of Wildlife

The DEIS does not adequately address the displacement of wildlife from the construction on the EPG into the surrounding neighborhoods. The DEIS should be amended to make provision for properly managing the movement of wildlife from this now largely wild area into adjacent areas before they become a nuisance to area residents.

P45.8

Respectfully submitted,



Joseph G. Bury
HOA President

P46-P53

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Respectfully submitted,

Joseph G. Bury
HOA President

Dear Brac Team,

What assurances will be available that ALL hazmat and unexploded ordnances will be completely eradicated from the EPG area before construction is completed? I know that the Army did not do their homework when they closed Ft. Richie, Md some years ago. The new owners were ready to start construction and the Army said, NO, we have to check for unexploded ordnance. This area seems to be more of a concern than the one mentioned.

P46.1

Thanks,
Dennis Steiner

I am concerned about the traffic on Pohick/Rolling Rd between Richmond Hwy (RT1) and the Engineer Proving Grounds (EPG). Currently, many Belvoir employees who work on Belvoir travel from the south and use RT1 to reach Ft Belvoir. I believe many of them, who will commute from the south, will continue to use RT1 and will turn onto Pohick Rd to reach the EPG. When I mentioned this concern during the informal period at the 17 April 07 meeting, the transportation representative told me it was envisioned that the traffic would travel on Interstate 95 and reach the EPG from that highway. What happens when there is traffic congestion on Interstate 95? This happens at least once a week now and will probably increase with the increased number of commuters. Currently the traffic moves over to RT1 to avoid Interstate 95. I believe they will then use Pohick/Rolling Rd to reach the EPG. I don't see any plans in the DEIS to widen Pohick/Rolling Rd or in some way address the increased traffic.

P47.1

The Army has released the DRAFT Environmental Impact Statement (DEIS) that analyzes the environmental and socio-economic impacts of changes in and around Ft Belvoir, VA, as a result of the 2005 Base Realignment and Closure (BRAC) Commission's recommendations. Pursuant to any change with the revisit or re-opening of the 2005 BRAC, the following comments are submitted as part of the official public comment period.

As a resident of the Springfield area where I live and work, the quality of life within the area surrounding the Ft Belvoir complex to include the Engineering Proving Ground (EPG) will be greatly impacted by the BRAC. The nearly 22,000 new workers that are slated to be relocated to Ft Belvoir will face a 12 hour per day traffic jam with peak commuter traffic seeing a three-hour delay entering and exiting the post. The personnel addition at Ft Belvoir is the equivalent of re-sighting the Pentagon at Ft Belvoir! The key difference is the Pentagon was built more than 60 years ago with the focus on moving ~ 25,000 into the area each day.

P48.1

Being a resident of Springfield and actively involved with the revitalization of the area, one must be concerned with the drain and negative impact BRAC will have on the growth of commercial business development within the central part of Springfield. With three major redevelopment programs on the horizon, the full implementation of BRAC could delay or halt any or all of these projects. With the announcement and beginning of the Springfield Mixing Bowl project, the second largest public works project outside of the Boston Tunnel Project, property values for commuters within a few miles of the Mixing Bowl were impacted by a seven to ten or greater percent reduction in property values that took many years to recover. We in the Springfield area want our community to be a place to go to rather than a place to go through. With the imposed traffic congestion at Ft Belvoir, business and residential opportunities will avoid Springfield for it will be far too hard for these businesses to compete with the facilities on the base. Like the Pentagon and other encapsulated military communities the people who work on-site will eat and stay on site for it will be too hard to travel off base and return in a reasonable time.

P48.2

One reason for the move from current secure locations to Ft Belvoir was the issue of terrorist attacks. Under consideration for development at Ft Belvoir is the building of two bases split by one of the busiest interstate highways in the nation. Interstate 95 becomes a traffic jam and comes to a halt in the morning as well as in the evening. During peak weekend and holiday travel times, it often takes hours to travel less than 30 miles. Splitting the development between Ft Belvoir and the EPG will require duplicate security forces, duplicate fire protection, duplicate fitness and day-care centers as travel between the two facilities would be stalled by either I-95 or the Springfield-Franconia Parkway. The division of forces (and facilities) is contrary to military teaching that goes back thousands of years to the great military philosopher Sun Tzu.

P48.3

If the real concern for the environment is evaluated, then the addition of a southern platform at the Springfield-Franconia METRO and VRE terminal would be an ideal solution. Building a south terminal platform and staying with the Town Center Alternative would allow for the maximum utilization of mass transportation. Traveling south from the new south platform, shuttle buses could travel a newly built and improved road directly from the METRO/VRE into Ft Belvoir without getting onto the Springfield-Franconia Parkway or crossing over I-95. All the current plans for sighting the additions to Ft Belvoir, except the Town Center Concept and not building of a south platform or terminal, forces all mass transit travelers to come onto the Parkway and greatly impacting the current heavy traffic on the roadway. Of each dollar Northern Virginia residents send to Richmond less than 19 cents comes back to area where road improvements are desperately needed as the current transportation networks are choked to the breaking point.

P48.4

The road improvements maps have cut short many of the surrounding areas where road construction is planned or recommended. Several maps that are shown or used at briefings cut short many areas on the northern edge of the EPG grounds where new road improvements or construction is seen. Recommend that the maps more correctly show areas outside the immediate areas of potential use by the BRAC relocations.

P48.5

Keeping all the construction on the east side of I-95 greatly impacts the ability to provide inter as well as intra base transportation. Transportation links could easily be built to handle this type of inter as well as intra base needs. Links to the METRO and other commuter lots or nodes would be greatly improved by using the single base concept. Splitting bases only adds to the mix and doubles the inter and intra base transportation problem. Larger entry and inspection access points could be built versus the need to build more in number for a two base concept.

P48.6

To better support the Town Center concept of development, Davison Army Airfield needs to be part of the new Ft Belvoir build-up. Davison Airfield is a very limited use facility. The Ft Belvoir installation commander has repeatedly referred to the air strip as a VIP or executive use facility. Less than 150 cars can be found on the airfield on any particular day and should it rain that day, the number is cut in half. It is termed a limited use facility by the FAA for it has few navigational aids. The least amount of weather causes the airfield to close to all traffic. As for the field tenants, all could be easily moved to other nearby locations. The DC Army Guard should be moved to Reagan National Airport after all general aviation users were moved from the airport. The Guard's few assets would be closer to the DC National Guard headquarters if relocated to National IAP. The 12th Aviation Battalion could be moved to better serve the Army as their website talks of building clearing after natural or man-made disasters or crowd control at the Nation's Capitol Air Show at Andrews AFB, MD and lists few Army related Aviation activities. The VIP and executive traffic could and should be moved to Andrews where a whole VIP and protocol activity is currently in place. All the other activities at Davison could be moved to other parts of the base, Quantico, Andrews, National, or other bases. At a Congressional Oversight Hearing last year, the Assistant Secretary of the Army for Installation, when questioned about the use or potential use of

P48.7

Davison Airfield by Congressman Davis, testified that □Davison could be used as part of the BRAC relocation to Ft Belvoir if the Army found new locations for the current tenants at the airfield. □ The Army installation commander, the folks working the BRAC and others have not fully considered the use of Davison airfield in the BRAC process and should be encouraged to modify the Town Center Alternative for including the airfield. The inter and intra transportation modes to best support the single base concept would be better suited by the construction of a few bridges or tunnels to avoid impacting the civilian traffic on the four-lane section of the Parkway extension currently dividing Ft Belvoir/DLA and Davison Airfield.

The reuse of Davison makes for a unified protection plan for Ft Belvoir and avoids the base split by I-95 and the protection of two large operation locations. The reuse of Davison Airfield leaves the EPG section for the Army Museum, a Fairfax County Park, and other Army culturally-correct attractions. Like the Marine Corps Museum at Quantico --- easily seen from I-95, an easily acceptable Museum would greatly improve the number of people who would consider attending the Army Museum. To say that the Army Museum attracts the same type of folks who might be visiting George Washington's Mt Vernon is using some very fallacious logic. The type of visitors to the Army Museum are the veteran, retired and service-associated folks who visit the Marine Corp Museum or the Air Force Museum at Wright-Patterson AFB, OH.

P48.8

In addition to the above-mentioned issues, the BRAC Ft Belvoir have yet to address the GSA Warehouse, Springfield, VA, as a possible location for the new hospital at Ft Belvoir. At the BRAC April 17th Public Meeting, many federal and state elected officials mentioned the relocation of Walter Reed Medical Center not to Ft Belvoir as seen in the BRAC proposal, but to the GSA Warehouse site. Closer to METRO and other transportation nodes as well as the NOVA Medial training site, no one has looked at the hospital relocation options.

P48.9

John R Sperling
7435 Spring Summit Road
Springfield, VA 22150

The Draft EIS suggests that "significant transportation effects would be limited to the entrance points and the immediately adjacent transportation facilities. These significant effects would disappear into the regional traffic flow within 3 to 5 miles of Fort Belvoir. Beyond the 3- to 5-mile range the effects become negligible for all alternatives."

Our 423 home subdivision is within 1.2 miles of the current EPG entrance off Rolling Road. Any additional traffic moving north along the connected Fairfax County Parkways or additional commuter traffic along Rolling Road to job sites on the EPG will practically land lock us in our West Springfield Village and the Winter Forest Community

See
p49
(resubmission)
below

immediately adjacent and south of us. The road is currently max'd out during rush hour traffic and it's nearly impossible to make a left hand turn onto it from our side streets.

Rolling Road is scheduled for widening to four lanes starting in 2013, but it should be completed before the EPG opens for business. So we have an issue with the timing of the projects (BRAC moves to EPG, connection of the Parkways and scheduled completion of the project to widen Rolling Road). Should be an easy fix:

1) Cause VDOT and our County Supervisors to move Rolling Road up to be completed by 9/2011.

2) Upgrade that northern ramp interchange off what is now Rolling Road onto westbound Fairfax County Parkway. That single lane ramp will not be able to accomodate additional EPG traffic or traffic from the connected parkways. It also needs to be improved well before the BRAC completion date. If not, even more frustrated traffic will continue north along Rolling Road further exacerbating our dilemma.

The Draft EIS also states that "Any significant traffic effects as a result of the BRAC action should be mitigated with transportation improvements, such that the negative effects become minor or negligible." Though the immediate impact of occupying the EPG will not be the primary contributor to congestion along Rolling Road, the requisite connection of the two segments of the Fairfax County Parkways will be. VDOT had advertised their desire to put an interchange from I-95 onto the Fairfax County Parkway. That will certainly increase traffic volume past the EPG and onto Rolling Road. The two are connected as will your mission be connected to VDOT.

Strongly urge you to include the single lane interchange and widening of Rolling Road as critical and necessary transportation projects to make the BRAC occupation of the EPG a mission success.

Thank you - John Cooley

this is 2nd submission - I should have read the first one more closely. Please disregard the earlier submission and use this instead.

The Draft EIS suggests that "significant transportation effects would be limited to the entrance points and the immediately adjacent transportation facilities. These significant effects would disappear into the regional traffic flow within 3 to 5 miles of Fort Belvoir. Beyond the 3- to 5-mile range, the effects become negligible for all alternatives."

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Strongly urge you to include the single lane interchange and widening of Rolling Road as critical and necessary transportation projects to make the BRAC occupation of the EPG a mission success.

Thank you - John Cooley

I am amazed, appalled, and confused as to why straightening and widening Rolling Rd is considered beyond the Constrained long-term plan of the road improvements, and Fullerton Rd is not mentioned. With no traffic whatsoever at the EPG, the light at the corner of Fullerton and Rolling backs up (down both streets) incredibly badly at rush hour. The number of accidents on the section of Rolling Rd next to the EGP is already ridiculous. And yet, roads that are NOT near the EPG are given more consideration (Beulah, Telegraph, Lorton, and Newington Roads, for instance) then those expected to get an additional 18000 workers.

I understand that the assumption is that individuals will use the major roads; however, at rush hour, they will use whatever road they can get to, which very much includes both Rolling and Fullerton.

P 50.1

I own 2 townhouses in the effected area: one in Saratoga, and one in Shadowbrook. I can tell you, from personal, daily commuting experience, that failing to widen Fullerton to 2 lanes in each direction (and three at the Rolling Rd light) and straightening and widening Rolling to at least 2 lanes in each direction will cause the roads to completely shut down with traffic at the major commuting times.

I object to the movement of agencies that are currently in leased buildings in Alexandria and Arlington moving to Ft. Belvoir or anywhere in the local area that has no immediate access to existing public transportation. The leased facilities with available subway/bus transportation have served DOD and the Federal Government very well in the past three decades. The Metro access of these facilities has kept thousands of cars off the roads and decreased pollution and traffic. The proposal requires additional millions of dollars in road improvements and will unnecessarily increase traffic and pollution. The Northern VA area is already in a crisis mode with traffic and congestion. Organizations such as WHS and others that are part of a headquarters activity in the Pentagon need to be physically close to the building or they will be spending half the day in travel status. DOD employees are as secure as other Federal government employees in leased facilities. As a taxpayer, I do not support this plan, and I have voiced this concern to my elected representatives.

P51.1

I am most concerned about the impact that BRAC will have on our forests, wetlands, and open space. I believe that overdevelopment and the loss of our trees have caused flooding and severe deterioration of our environment. This situation can only get worse. Implementation of the BRAC initiative is happening too quickly. I don't believe the Federal Government has adequately coordinated with organizations responsible for caring for wetlands, forests, and wildlife. When implementing BRAC in the Fort Belvoir area, I hope we do all we can do to preserve open space and green areas. There is so much history and beauty that will be lost with the destruction of these areas.

P52.1

To the extent the pursuit of non-BRAC mandated projects impair the environment or worsen traffic, they should be significantly reduced or eliminated. Thank you very much.

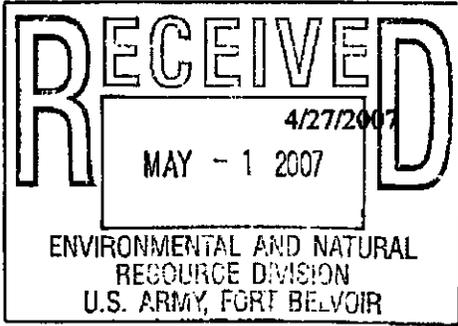
P52.2

While NEPA allow the Army to maintain discretion over whether to hold public hearings during the EIS process, I find this method of a single public hearing is highly objectionable. The fact that the EIS affects Fairfax County's largest employer, an estimated 300,000 local residents in Fairfax County alone, untotaled nearby residents(DC/VA/MD) and 22,000 employees moving to the base. Yet the Army has one hearing scheduled for 90 minutes at the local high school.

P53.1

I will be out of town but would expect a media circus and political grandstanding as opposed to a dialogue and comment session for the local public. Both the Army and Fort Belvoir are clearly missing an opportunity to reach out and communicate directly with the affected public on this significant "proposed" action. The Army should be holding at least 3-5 public hearings in Fairfax County alone.

P 54



Mr. Patrick McLaughlin
 Fort Belvoir Directorate of Public Works
 Environmental and Natural Resources Division
 9430 Jackson Loop
 Fort Belvoir, VA 22060-5116

Copy to: Gerald Hyland, Fairfax County Board of Supervisors, Mount Vernon District

Subject: Comments on *Draft Environmental Impact Statement for Implementation of 2005 Base Realignment Recommendations and Related Army Actions at Fort Belvoir, Virginia*

Dear Mr. McLaughlin,

As a lifelong resident of Fairfax County, I am concerned about the effects of Base Realignment and Closure (BRAC) at Fort Belvoir, including adverse impacts to Route 1 and I-95 traffic, regional air quality and the loss of natural environment along Accotink Creek. I question whether the full magnitude of BRAC impacts on Fairfax County have been fully and adequately evaluated within the BRAC Draft Environmental Impact Statement (DEIS) and would like to see the resulting Record of Decision (ROD) document commit to specific, comprehensive and binding mitigation actions on the part of the Department of the Army. (As a Fairfax County taxpayer and

P54.1

homeowner in the Mount Vernon District and as a local utility ratepayer I am also concerned that I will be unfairly burdened by traffic gridlock, effectively blocking Fairfax County residents access to Route 1 / I-95 to the south each workday, by higher state and local taxes to address this situation, and by higher utility rates to cover the utility infrastructure costs triggered by BRAC construction at Fort Belvoir. These sacrifices seem to be on the verge of being decided by the Army without my consent, and without the knowledge or consent of the voters in Fairfax County.

P54.2

Please consider making corrections to the environmental analysis for BRAC at Fort Belvoir as addressed below, and see that the resultant ROD and any subsequent Finding of No Significant Impact (FONSI) do include specific actions that the Department of the Army commits to accomplish in a timely manner that avoid, minimize, mitigate and off-set environmental and socioeconomic impacts. Additionally, I am requesting that the ROD and any subsequent FONSI include clear and specific fiscal commitments by the Department of the Army to fund all concomitant local and regional transportation improvements, utility/infrastructure upgrades, new schools and other safety and social services that this Federal action invokes in support of BRAC development at Fort Belvoir.

P54.3

The magnitude of planned land development and the huge number of incoming DOD personnel, multiplied by their contract support staff as commanded by BRAC at Fort Belvoir will bring significant adverse impacts to Route 1/I-95 traffic, air quality and the natural resources of this region, yet the benefits of this development are secured behind the base perimeter, not generally open to civilians. It would be unfair for the Army to contribute to the woes of this region without knowing or fully appreciating their impact, magnitude, nor engaging in meaningful discussion and planning with Fairfax County officials to commit to concrete measures to alleviate the burden Army actions cause for neighbor's to Fort Belvoir. Understandably, details about incoming elements of BRAC as well as the timing of BRAC implementation, are beyond the scope of the DEIS.

P54.4

I believe that the scope of the Federal decisions to be evaluated within the DEIS for implementation of BRAC at Fort Belvoir should be (1) the geographic placement of incoming elements and tenants within the whole of Fort Belvoir and (2) site-specific site plans, design concepts, and operational concepts of the BRAC elements within each proposed geographic location on Fort Belvoir. The DEIS seems too conceptual in nature, lacking adequate specificity concerning this Federal action upon which Fairfax County impacts may be identified, discussed and impact mitigations defined. I found evidence of a cursory analysis of viable alternatives for Decision Part (1), but apparently little to no analysis for Decision Part (2) was included. The absence of adequate analysis of the latter decision may not matter so much with regard to traffic impact. But regarding air quality and natural environment, this absence of meaningful alternatives analysis does render the DEIS incomplete. I suggest follow-on NEPA analysis, perhaps in the form of tiered Environmental Assessments be undertaken to fully assess the environmental impacts of reasonable alternative site plans, conceptual designs and conceptual operations. For instance there would be much more impact to the natural environment if sprawling, low-rise campuses with surface parking and thereby large footprints are built within environmentally sensitive areas, rather than if sensitive environmental areas are better preserved through more consolidated, high-rise facilities, structured parking and shared facilities. The DEIS is silent at this level of alternatives analysis.

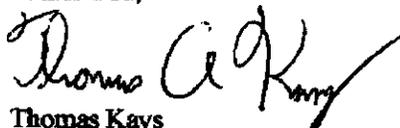
P54.5

I especially disagree with the proposed Land Use Plan (LUP) that eliminates the long-standing designation of "Environmentally Sensitive" land. Elimination of "Environmentally Sensitive" land as a protected category from the Fort Belvoir LUP seems unneeded for BRAC implementation, and appears to weaken and reduce environmental restrictions on land development and to open up previously off-limits, conserved land to unrestrained development. The DEIS presents no compelling need for this change with regard to BRAC and I strongly request that the "Environmentally Sensitive" land use category be retained. I understand "Environmentally Sensitive" lands on Fort Belvoir protect two designated wildlife refuges, the Forest and Wildlife Corridor and bald eagle habitat on-post, along the Potomac River shoreline. These green areas are clearly environmentally sensitive and should remain designated as such, and stay off-limits to development sprawl. The heedless loss of significant wildlife corridors on Fort Belvoir will further stress wildlife and reduce its presence in contiguous areas of Fairfax County and about Mount Vernon where I live.

P54.6

Please see that my concerns are addressed expeditiously while changes and improvements to the BRAC site plans are still possible.

Thank You,



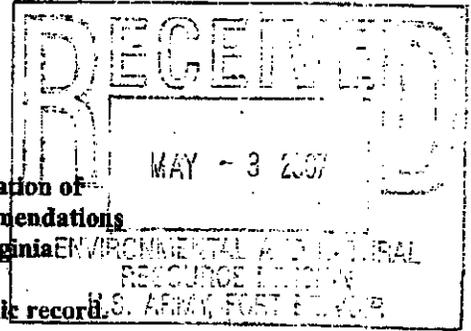
Thomas Kays

Fairfax County Resident / Fort Belvoir Neighbor / Concerned Citizen

P55

Comment Form

Environmental Impact Statement for Implementation of
2005 Base Realignment and Closure (BRAC) Recommendations
and Related Army Actions at Fort Belvoir, Virginia



NOTE: All information submitted will become public record.

1. Your information:

Name: Jerrold Allen
Title: _____
Agency/Organization: Alexandria Friends Meeting at Woodlawn
Address: -7135 Noland Road
City, State, Zip: Falls Church, VA 22042
Phone: 703-289-1175
E-mail: jallen@earthtones.com

Please send a CD copy of the Final EIS to me.

2. Please check the one affiliation that best represents your role or interest in the EIS:

- | | |
|---|--|
| <input type="checkbox"/> Fort Belvoir Resident | <input type="checkbox"/> Recreational Organization |
| <input type="checkbox"/> State Government | <input type="checkbox"/> Private Citizen |
| <input type="checkbox"/> School/University | <input type="checkbox"/> Federal Government |
| <input type="checkbox"/> Civic Organization | <input type="checkbox"/> Business/Commercial Organization |
| <input type="checkbox"/> Federally Recognized Tribe | <input type="checkbox"/> Environmental Organization |
| <input type="checkbox"/> County | <input checked="" type="checkbox"/> Other: <u>Religious Organization</u> |

3. EIS Areas of Concern. Please check the appropriate boxes and write your specific comments about the area of concern in # 4 below. More Comment Forms are provided at the Written Comments table if you need additional space.

- | | |
|--|--|
| <input type="checkbox"/> Construction | <input type="checkbox"/> Noise |
| <input checked="" type="checkbox"/> Traffic and Transportation | <input type="checkbox"/> Native American Resources |
| <input checked="" type="checkbox"/> Cultural Resources/Historic Properties | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Socioeconomics | <input type="checkbox"/> Water Quality |
| <input checked="" type="checkbox"/> Wetlands, Wildlife, Endangered Species | <input type="checkbox"/> Other: _____ |

(More comment sheets are available if you need additional space.)

4. Please write your comments in the space provided below.

P55.1
My chief concern with new development at Fort Belvoir would be the potential adverse impacts on the Friends Meetinghouse on Woodlawn Road where I worship regularly. It seems that one of the proposals — the Preferred Alternative — might have an adverse visual impact on that property. In particular I am concerned that the Meeting be protected from adverse effects — visual, or noise, or traffic — from project #15, the Access Control Point. It appears that the City Center Alternative would be the best option for respecting the Meeting's interest.

P55.2
In addition, although not specific to my interest in the Meetinghouse historic property, I am concerned with the deletion of the "environmentally sensitive" category which protects substantial areas of the Base property.

Thanks for your attention.

Samuel E. Allen

Web Site

Comments may be submitted online at: www.BelvoirBRAC-EIS.net

E-mail: Comments may be e-mailed to: environmental@belvoir.army.mil

Mail: Comments may be mailed to:
Attn.: EIS Comments

Fort Belvoir Directorate of Public Works
9430 Jackson Loop, Suite 100
Fort Belvoir, VA 22060-5116

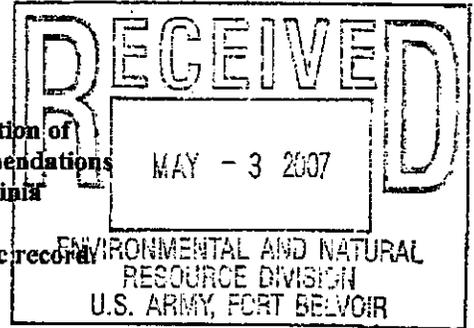
All comments must be received or postmarked by May 1, 2007 to be considered in preparation of the Final EIS.

(More comment sheets are available if you need additional space.)

P56

Comment Form

Environmental Impact Statement for Implementation of
2005 Base Realignment and Closure (BRAC) Recommendations
and Related Army Actions at Fort Belvoir, Virginia



NOTE: All information submitted will become public record.

1. Your information:

Name: Maggie Heninger
 Title: _____
 Agency/Organization: _____
 Address: 7110 Hadlow Ct
 City, State, Zip: Springfield VA 22152
 Phone: _____
 E-mail: _____

Please send a CD copy of the Final EIS to me.

2. Please check the one affiliation that best represents your role or interest in the EIS:

- | | |
|---|---|
| <input type="checkbox"/> Fort Belvoir Resident | <input type="checkbox"/> Recreational Organization |
| <input type="checkbox"/> State Government | <input checked="" type="checkbox"/> Private Citizen |
| <input type="checkbox"/> School/University | <input type="checkbox"/> Federal Government |
| <input type="checkbox"/> Civic Organization | <input type="checkbox"/> Business/Commercial Organization |
| <input type="checkbox"/> Federally Recognized Tribe | <input type="checkbox"/> Environmental Organization |
| <input type="checkbox"/> County | <input type="checkbox"/> Other: _____ |

3. EIS Areas of Concern. Please check the appropriate boxes and write your specific comments about the area of concern in # 4 below. More Comment Forms are provided at the Written Comments table if you need additional space.

- | | |
|--|---|
| <input type="checkbox"/> Construction | <input type="checkbox"/> Noise |
| <input checked="" type="checkbox"/> Traffic and Transportation | <input type="checkbox"/> Native American Resources |
| <input type="checkbox"/> Cultural Resources/Historic Properties | <input checked="" type="checkbox"/> Air Quality |
| <input type="checkbox"/> Socioeconomics | <input checked="" type="checkbox"/> Water Quality |
| <input checked="" type="checkbox"/> Wetlands, Wildlife, Endangered Species | <input checked="" type="checkbox"/> Other: <u>Schools</u> |

(More comment sheets are available if you need additional space.)

4. Please write your comments in the space provided below.

I hope that you seriously consider the concerns that many people have expressed. If done correctly and implemented within a reasonable time-frame, this region can successfully adapt to change.

P56.4

P56.1

My family recently moved to W Springfield for several reasons, including its accessibility to public transportation and schools. Since our move, we have been bombarded with negative news regarding BRAC actions at Ft. Belvoir. DoD claims that these realignments and closures are being made "to keep up with evolving global security requirements." I am deeply concerned that the inevitable severe traffic congestion around Ft. Belvoir's main base and the EPG site can only undermine our national security. How can we be secure if DoD employees are unable to get to their jobs because of clogged roadways? My concern is for both DoD employees and the general public who will have to deal with this on a daily basis. It is particularly disturbing that most of the 22,000-some employees will be working at the EPG site. It would seem wise to spread out the work sites, and to make use of public transportation as much as possible. It seems obviously clear that certain transportation improvements need to be at or near completion before this realignment takes place. Our quality of life depends on it.

P56.2

I am also concerned that ^{with} this massive influx of employees, more demands will be placed on schools. Many schools are already maxed out, with students having to take classes under less desirable conditions such as in trailers. Another issue of concern

P56.3

is how this will affect our natural resources, including our air quality. Traffic delays increase levels of ozone and particulate matter, leading to poorer air quality conditions.

Web Site

Comments may be submitted online at: www.BelvoirBRAC-EIS.net

E-mail: Comments may be e-mailed to: environmental@belvoir.army.mil

Mail: Comments may be mailed to:
Attn.: EIS Comments
Fort Belvoir Directorate of Public Works
9430 Jackson Loop, Suite 100
Fort Belvoir, VA 22060-5116

All comments must be received or postmarked by May 1, 2007 to be considered in preparation of the Final EIS.

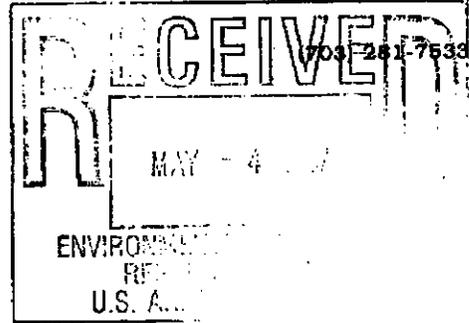
(More comment sheets are available if you need additional space.)

P57

E.L. TENNYSON, P.E.
2233 ABBOTSFORD DRIVE, RFD 55
VIENNA, VA 22181-3220

REGISTERED
PROFESSIONAL ENGINEER

30 April 2007



Mr. Patrick McLoughlin, Director
Public Works, Environment
Fort Belvoir Bldg 1442
9430 Jackson Loop
Fort Belvoir, VA. 22060-6116

Dear Fort Belvoir:

P57.1 I took my basic military training at Fort Belvoir and now I live in Fairfax County where highway traffic is approaching gridlock. The BRAC program must face the reality of traffic problems and economic challenges as Ft. Belvoir adds 23,000 more employees. The Draft Environmental Impact Statement MUST face and meet the challenges of the problems of congestion, pollution, air quality, travel safety, oil supply and non-auto access to Fort Belvoir.

Three years ago Virginia Department of Transportation thoroughly studied Richmond Highway US 1 through Fort Belvoir and found it hopeless. Public hearings were held and many testified about the need for Light Rail Transit on Richmond Highway. As a practical matter, Light Rail Transit may not be feasible south of Ft. Belvoir, but north to Huntington Avenue Metro Rail station and to Springfield Metro Rail Station is more than feasible. It is vitally essential.

P57.2 The Va DOT study found the Bus Rapid Transit on Richmond Highway would reduce the capacity of that essential highway to move people. We can not tolerate that. The Federal Transit Administration collects data which reveals that Light Rail Transit averages only 56 cents per passenger-mile to move people but buses average 76 cents, 35 per cent more. We can not afford that. Worse, buses are less safe and less efficient reducing future revenue to help pay for the service. Terrorists use buses for bombing. Light Rail train can not be used by terrorists other than suicide bombers with personal small bombs.

P57.3 With Light Rail, study finds that a single track in the median of US 1 can handle 1,200 peak hour passengers one-way plus as many who wish to travel in the lighter direction. That will add up to 12,000 per weekday, many times more than REX bus.

Patrick McLaughlin, Director Public Works & Environment BRAC DEIS from Terryson page 2

Obviously, passing ^{sideways} will be required every two + miles but Sacramento has proven they can work very well. Pedestrian safety on US 1 is an oxymoron with bus lanes and left turn lanes but center island Light Rail station will greatly reduce the ^{hazard} but not eliminate it. Walk signals will be needed.

P57.3
(con...)

Funding for Light Rail can come from the recently funded Northern Virginia Transportation Authority, from the Federal Transit Administration, from the Virginia Department of Rail & Public Transportation and from the Department of Defense.

It would be best if Light Rail would enter the Post on Belvoir Road to 12th Street to the Military Railroad right-of-way to Newington, Moody Center, Heller Loop and Springfield with the main station at 12th Street. If the powers that be will not permit this for good and justified ^{reasons}, a military bus shunt system from a US 1 station will be required.

The prospect of HOT lanes on I-95 + I-395 has promoted the idea of ^{express} buses there but there are three fatal problems with using them to serve Ft. Belvoir.

P57.4

- 1 - Buses can not stop on bus HOT ^{lanes} so few people can be served.
- 2 - The demand will not be there for individual bus routes.
- 3 - Buses are labor intensive and too costly for busy routes.

A few buses, such as from Fort Belvoir to Centerville or Dulla Airport may be highly desirable but that will not make a dent in the problem.

P57.5

We may be talking about \$480 million here, of which \$384 million should be federal, mostly FTA but some DoD. The state and NVTA would split what remains to be raised. There is no better investment a taxpayer could make.

P57.6

Some want to extend Metro Rail to Fort Belvoir but this is foolhardy. Metro Rail will be running eight car trains, six for sure, when Ft. Belvoir ^{loads} justify only two cars. The waste would be prohibitive. Metro Rail can not ^{have} several more convenient stations. Metro Rail will cost more to build to serve fewer people. That can not be justified. Money is and always will be a problem.

P57.7

Since 1984 to 2004, FTA reports ^{rail transit} has ^{attracted} 50% more ^{passenger-miles} but bus transit lost a ^{few passengers}. Why depend on a higher cost to get? Why depend on Arab Muslim oil?

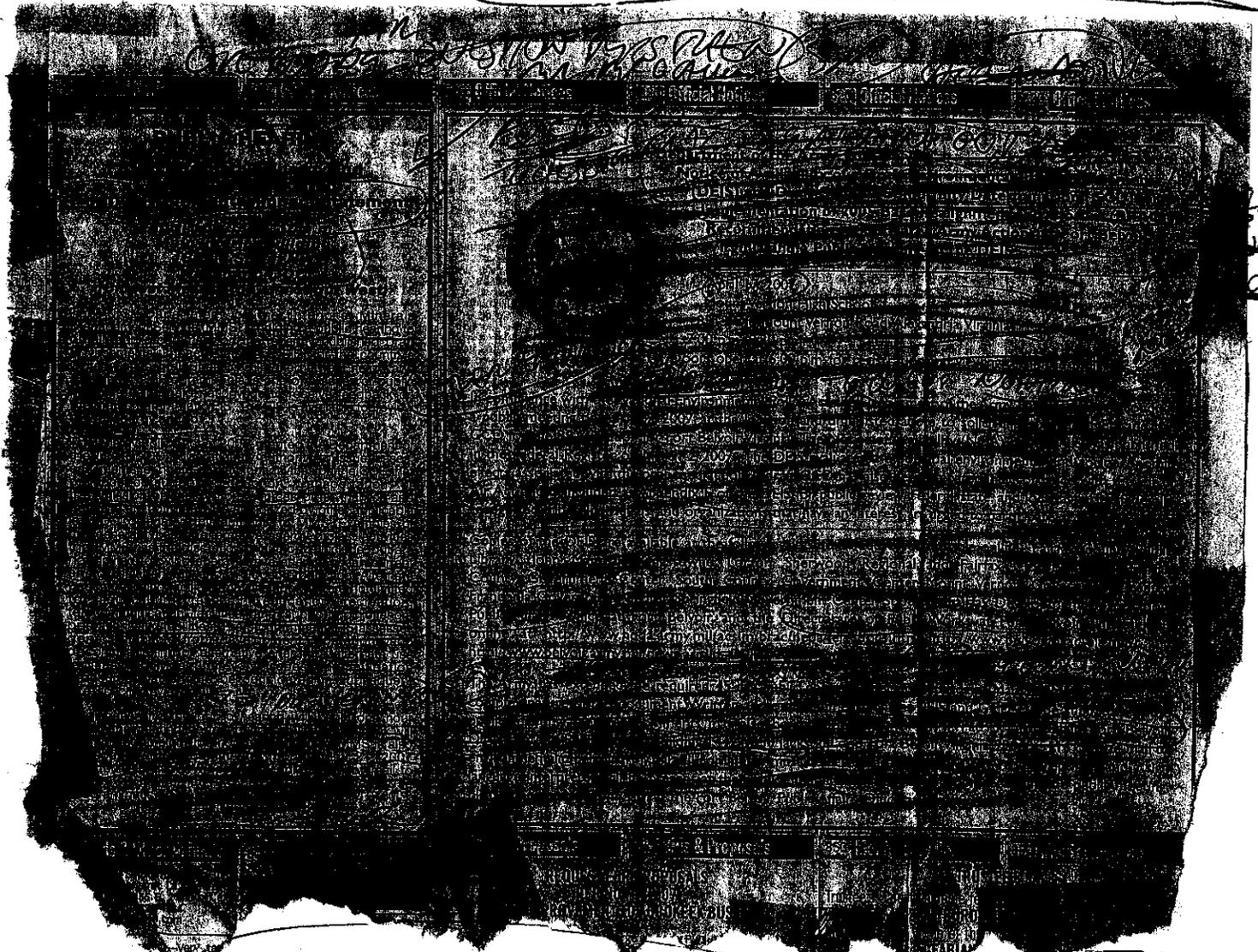
Respectfully submitted



cc: Hon. Ed Olson, N.C.

YOU MAY CALL ME AT SYCAMORE, ILLINOIS
 BUT YOU REARER ~~WILL NOT~~ #008277
 ARMY? ~~ONE~~ P.O. BOX 780 SOLEM
 YOUR FRIEND ~~OF YOURS?~~ MUNCY, PA 17756
 YES ~~PAID TO FORMER P.F.C. ARMY~~ ~~1952-1983~~
 WOOD FINE ~~1952-1983~~

P58



DEAR MR. McENAGLEN, APRIL 23 2007
 - WIFE - BUDDY CASHEN
 YOU MUST HAVE NOTHING
 (PARDON EXCUSE) (MR CULTURAL
 MIA ECF) (WIMOOT) (WARRABAS)

OR OLL (YOU GOT TO MINE)
ME SATELITE (SOUND CHAT)

(ALL THAT GOES IN) & (ME
THIS (ESD FAC - CALCULUS) AND)
SUFORAN) - SO WHAT IS

DONT IT BEFORE TOO -
(CALCULUS) THE REAL

WORLD OF LIMITATIONS
IS MATHS (YOUR

BALL (IN THE T (STRIP PRO)

W AN W BULLDOZER (EVEN
METAL) ON (SHEL) (GIRDS
BENDING)

SPEAK (MUSIC) (PART OF FOOD)
MUSCLE (PARTS MUSCLE) (BUS)

(TABLE PARTS (MANIPULATE POINTS) CANS
OF FOOD (TRANSPORTATION

(LIVE ONLY)

3
SMIP MANA MANA ORE (COORS
UNIT GARD CANYON) YOU
(MINE) TONS AND TONS ORE
GIVEN SEND OUT TO MILL
& CANTON BET UNIT

~~PLANNING GOLD~~
SUBCLOSURE ~~THAT~~
ONLY MAY BE 1-2% OF
IT OUT OF THE WHOLE RUN
OF DIRT IS USEFUL (2%)

82
MAYBE A DOZEN
SD - (COMMODITIES)
SHE ORE SENT FROM

MANY MANY COMPANIES TO
MAKE ① MANUFACTURED
OBJECT? LETS SAY AND

ONE COMPANY EQUIPMENT -
+ ON EARTH IS SATISFIED OK?

BUT THEN ⁴ (GOT A MOLD)
PUT THEM INTO SHELTER TO A

A MOLD TO FORM A CAR SIDE

ANY AND ALSO SOLID OBJECTS
WHETHER IT IS PLASTIC RUBBER

EACH SUBSEQUENT CHANGE
IN DESIGN OBJECTIVE NEW

OBJECT ADDED (NEW &
(IMPROVED) ETC (REWORKS

A NEW MOLD) - NO SUBSEQUENT
EACH TIME - (YOU ARE

USING MACHINERY OR TOOL
WHICH IS FINITE IN

NUMBER - ONLY DONE
AND SUBSEQUENT

USE (CAR SIDE) ^{ANYTHING}
FINITE - ONE DAY THE PIPELINE

EXAMPLE
CIRCUIT
WOOD
SOME
NO
NO

OUTDOOR - ARREST PAINT
(HAMMING) PHARMACEUTICAL
PRODUCTS - TO PROTECT

(YOU'LL HAVE THE METHODS
DIFFICULTY REPLACING THEM
WORLDWIDE)

2005 → 2075 (2080-2030)
2075 (PENSION BOARD
2005 - WITH
75) IS MOST
OUT OF PRODUCE
PENSIONERS

(IMPLICATIONS (NO PAYMENT?
FOR VEHICLES?) - COME ON NOW!
YOU KNOW ITS SERIOUS STAY)

ARMY, AIR FORCE LET
ALONE (ALL CIVILIAN ECONOMY)

RUSH - IS GOOD FOR
GROWING SPIN OFF OF GOOD
FOR TRANSPORTATION WANTS
WORK ECONOMY (ON
NATIONAL SECURITY FILE
ARMY MANUFACTURE)

2005 2030 8
 IN THE NEXT 25 YEARS
 WORLD POPULATION
 WILL BE UPON 8 BILLION
 BEING UPON 8 BILLION
 $(6 + 2) \times 3^{15} = 6 + 2 = 8$

IMAGINE A GLOBE DARKENED IN
 A (WORLD) YOU WOULD NEED A
 WHOLE NEW CONTINENT ABOUT THE
 SIZE OF THE USA TO START TO
 SUPPORT SUCH A POPULATION

TRY ENGLAND WOULD DO A LOT
 TO TRY TO REDUCE OR CONTROL
 MAINTAIN CONSENS. GOV OF 350,000

AMERICAN (WOMAN'S) BOARD EVERY DAY
 (TV) 150,000 AND MAKE (DIFFICULT)
 WORLD EXPANSE IN PRODUCT

SHOTS BUSINESS PERFORMANCE PRODUCTS
 INCREASE IN PRODUCTS AT LEAST
 COST (EFFECT) LESS

DEBATE AGAINST OUR COMPANIES OR
 ALLOWING OUR SUPPORTS
 BUSINESS / ANNUAL ANNUAL
 PEOPLE - PARTS
 STU

~~BU COSTEN, "BUDPA", MR MEBLACUM~~

(572) YOU GOT (PARTS) (ANTIFRUIT)

LET'S SAY (CHEMICAL CABLES)

(CUMULATIVE) (SYNTHETIC RUBBER)

(MANY OTHER TYPES) (PERMANENTLY
PRODUCTS) (WE CAN ONLY ~~PRODUCE~~ ^{PRODUCE})

YOU (SAS SUCH) - ~~BUY~~ ^{BUY} ~~LOOK~~ ^{LOOK}

YOU'RE EXPONENTIALLY
INCREASED
(POPULATION) (RELATES)

(INCREASED OIL PRODUCTION
ATTACHMENT)

(INCREASED CONSUMPTION) (AND)

INFRASTRUCTURE - A FACTORY

(A PHYSICAL OBJECT) (PARTS)
~~DISPOSABLE~~ (CONSUMABLE)

(OR WINDS UP) (CARBON) (MUCKS)

(PARTS) (WORK OF) (DUMPKERS)

(PARTS) (EQUALLY) (MONEY)

8 / 33,000 (CELL PHONES) (COMPUTERS)

(SATELLITES) (PARTS) (NUCLEAR WEAPONS) (MISSILES)

ROCK BODDY + PETROCHEMICAL PRODUCTS
INCLUDE (M) - (ANTI ANTIC)

PRINT (PRODS) CAPACITORS
TRANSISTORS - THE ELECTRIC CATHODE

CABLE IN THE (COURT) (SUCCESS)

COMPUTER FEED LINE (ELECTRIC)
CONDS IN HOUSE (OUTDOOR)

UNDERGROUND WIRE (TOWNS)
TO ELECTRICITY FOR HOUSE

LET'S SAY 2 THIS (LATER
CONFERENCE?) COULD BECOME
A DIPLOMAT (POINT) FOR

200,000
150,000
200,000
NOT 6,000
DAILY
MILLION
EVERY
6 DAYS

EDUCATION?
GROWTH - AT LEAST
INCREASE - WORLD POPULATION
(IMPOSSIBLE?)

MADE? - ABOVE
GET MATERIALS? - PRODUCTION
SOME PARTS
2012 - SAME
2012 - SAME

CUT TRADE ROUTES? WORK THROUGH

~~CANADA~~ (GET ON TRAINING NON-POLITICAL) BEFORE THE NAFTA

WORLD
COVE
EVERY
COUNTRIES
TRADE
ROUTES

AN EXAMPLE) BEFORE

AGREEMENTS (TO CUT ROUTES)

DISCOURAGE BEFORE CONFER

ALL SALAD (BEFORE, EVERYTHING)
AMERICA FOR AMERICA

BRING ALL - GET OUT OF OUR
FACE SAFELY) CANADA FOR

CRADIA) MEXICO FOR MEXICO

CAN'T STOP BUSINESS OR MANUFACTURING
FROM EMERGING SO LEAST?

CUT TRADE ROUTES STOP MAKING

MANUFACTURING?) OR

PROLIFERATION? - TRADE

LIMIT?) YOU BET ANY ONE

NEED MORE LEAD TO BE MADE
IN CLEAR POWER FOR MORE
MADE (MORE INDUSTRIALISM)
HOME TO GET A BETTER CHARACTER

ON PLASTIC GAS (PIPELINE) NOW
ONLY SOME OF THE OF THE BLDG

ALL PIPELINES (RESTAURANTS)
(SCHOOL CAFETERIAS) (SEMI TRUCKS)
(HOSPITALS) (PRISONS) (MEZON
HUMES) (GROCERS STORE ITEMS)

plastic
copper
product

process to NOODLES

OLD (ELECTRIC) (WATER
GAS AN OLD) (YOU GOT
WORKING) (FAMILY?)

100,000 OF 100 OS END EVERY CDB
NEW YORK CITY, CHICAGO, WASHINGTON
MEXICO CITY, CANADA

→ FIBERGLASS INSULATION

(FOR TUBES) FIBERGLASS GLASS
CLEANER FILTERS (GLASS
PRODUCT) (FIBERGLASS)
(GLASS)
(GLASS)

of FIBERGLASS (IT BLENDS)
(NETS) (PHARMACEUTS) (PARTICLES)

& UMBRELLAS - A PART OF UMBRELLAS
WORLD POPULATION (BY AN ESTIMATE
11370) NEW SUDAN

60080 SUPPLIES - BUT - (4A)
600 TO MAKE THE STARTS

ON (MINE) (BRICK) (BUILDING) ¹⁰⁰⁰⁰⁰⁰
A (SUN) (PANEL) (MINE) ^{10-20 years}

WORLD (MANUFACTURING) ¹⁰
NATURAL GAS ON OIL (100)

600 TO MAKE A WINDOW (PANE)
(GLASS) (2) (6) (4) (2)

BUILDING (GLASS) (LET'S SAY)
ALONG A BEACH (SILICON) (LET'S)

SAY (SAND) (CERAMIC) (SAND)

^{Approx 20 miles} (SAND) (SAND) (SAND) (SAND)
^{100000 billions} (SAND) (SAND) (SAND) (SAND)
^{in world} (SAND) (SAND) (SAND) (SAND)

AND TAKE NEW OR DIFFERENT
OR IMPROVED PRODUCT?

YOU NEVER GAIN ENERGY EVER
ON THE EQUATION - BUT WITH
MATERIAL TO ENERGY CLAIMS

(3) WORLD WIDE EXPANSION (MINE)
(OIL) (ONE) (WHAT IS THAT?)

^{From about} (SAND) (SAND) (SAND) (SAND)
(SAND) (SAND) (SAND) (SAND)
(SAND) (SAND) (SAND) (SAND)

VARIOUS ^{ways of} ~~ways~~ SPREAD OUT

BUYERS PRODUCTS

(SPREAD OUT) GO LONGS OR F&NSW
DIRECTIONS → (PICK UP PIECES)

UP AROUND THE STATE → PRODUCE
INDUSTRY OF EXTRACTIVE INDUSTRIES
~~INDUSTRY OF MANUFACTURING~~

SPREAD VARIOUS STORES AROUND
STATE → PICK UP PIECES

AROUND STATE → (MAYBE TO
→ ENERGY?) (MAYBE) NOT

(AT LEAST 2 LEVELS (DO NOT
GAIN AT ALL) AND THEN NATURAL
GAS AND OIL TO BUILD THE MINE?

BRING PIECES (EXTRACTIVE) FROM
ALL AROUND THE WORLD

- WHAT CAN I DO WITH 'BUDDY'?

- 'UM' HYDROGEN? BY PRODUCT
(INDUSTRY) (NO NATURAL GAS?)

- NO INDUSTRY? (NO HYDROGEN?)

- ECONOMICS WORTH FOR HYDROGEN?

(2 WAYS DOES NOT GO IN
5 WAYS BUTS / ELECTRICITY)

~~NO COAL~~
~~ALSO~~ ~~NON-RENEWABLE~~

~~NO ENERGY~~ ~~WANTS NOT GO IN (SWIFT~~

~~NO BATTERIES~~ ~~BULB) (1/3 NO? ELECTRIC)~~

~~NO~~ ~~NATURAL GAS?~~ ~~NO NATURAL~~

~~WHAT IS~~ ~~1/3~~ ~~OUT~~ ~~HYDROGEN~~ ~~(NO HAVE ELECTRIC)~~

~~REQUIRES~~ ~~60% AS~~ ~~PARTS~~ ~~(CRUSHED)~~ ~~OLD~~

~~60%~~ ~~ALL~~ ~~ONE~~ ~~NATURAL GAS~~ ~~(ALL MANUFACTURED)~~

~~WATER~~ ~~ONE~~ ~~SYSTEMS~~ ~~(TRASH)~~ ~~SOLAR~~

~~EXTRACT~~ ~~(WIND POWER)~~ ~~(WARRANT)~~ ~~10-20 YEARS~~

~~10-20 YEARS~~ ~~(WARRANT)~~ ~~(WARRANT)~~ ~~10000000000~~

~~NO~~ ~~PIPELINE~~ ~~PLAN~~ ~~(WARRANT)~~ ~~(WARRANT)~~

~~INSIDE~~ ~~DEVICES~~ ~~(WARRANT)~~ ~~(WARRANT)~~

~~(WARRANT)~~ ~~(WARRANT)~~ ~~(WARRANT)~~ ~~(WARRANT)~~

300 million instances boxes - 30,000
NO NATURAL GAS ON OIL - NO

METAL MUMMIES - REFINING OILS

WILLING THAT 6000 BILLS OR
USEFUL ONE FROM THE POK

OR DIRT SPENDING

(BULLDOZER) LIKE GRASS (MOUNTAINS)

NO RECYCLING RUBEN) (EARTH)

WHAT CAN GOVERN DO?

4000
NO MORE
FROM
SAPPHIRE
SHELL
PINE
BURNING
CANS
ECONOMY
CUTTING

EVERY
YEAR
MULTIPLY
AND
CAN
CONCEAL
AS
NO
KEEP
TRY
MILIMED
?

LIKE IDENTICAL CUPPERS ON
BANDS SCISSORS OR RAZORS)

- ON THE NATURAL GAS ON OILS OILS
ON THE NATURAL GAS - FISHING COST

NETS? (ONCE ONLY BREAD)
(SPRINKLING) (EXPLANATION)

- PAPER PRODUCTS (E THAN (MATERIALS))
NO BATTERIES (EXTRACTION OF PAPER)

FOR BATTERIES (CONCERN WORDS)
SPEECH (WICKET) (CUTTING) (MINE)

NO ELECTRICITY? (NO HYDROGEN?) (GAS)
(ON NATURAL GAS?) (NO PAPER?)

new free transaction.com (14.45 IN ENG CO2)
OR UNIT FOR A UNIT
GERMANY DALLAN
FRANCE

OF GASOLINE (GASOLINE) PLEASE? 144,000 TO 75000
NEARLY 144,000 (GASOLINE) PLEASE? 144,000 TO 75000
GALCON

IT TAKES ABOUT 3 1/2 UNITS MORE PER VOLUME OF
UNITED NATIONS

UNITED NATIONS
UNITED NATIONS

PROXIOUS AS A VOLUME OF GAS

SO EVEN IF LESS CARBON EMISSIONS PER UNIT (NATURAL GAS) YOU USE 3 1/2 UNITS MORE - MAY BE MORE CARBON

EMISIONS (GASOLINE) (NATURAL GAS) (UNIT DENY)

ANOTHER (GASOLINE) (NATURAL GAS) (UNIT DENY)

EVERY UNIT OF CARBON EMISSIONS
ANOTHER (GASOLINE) (NATURAL GAS) (UNIT DENY)

Name SYLVIA W. SEEVER
Number # 008277
P.O. Box 180 SCIM
Muncy, Pennsylvania 17756 - 0180

RECEIVED
APR 23 2007
ENVIRONMENTAL AND NATURAL
RESOURCE DIVISION
U.S. ARMY, FORT BELVOIR

INMATE MAIL - PA
DEPT OF CORRECTIONS



UNITED STATES POSTAGE
07-1A
0004632304 APR 23 2007
MAILED FROM ZIP CODE 17756
\$ 00.870

TO: MRS. PARRACK MCCABETH LN
FORT BELVOIR
DIRECTORATE OF PUBLIC WORKS
BUTLORA 1442
9430 OAKES ON LOOP
FORT BELVOIR, VIRGINIA
77060-5116

COMMONWEALTH OF VIRGINIA
HOUSE OF DELEGATES
RICHMOND



VIVIAN E. WATTS
8717 MARY LEE LANE
ANNANDALE, VIRGINIA 22003

THIRTY-NINTH DISTRICT

Draft EIS Testimony
April 17, 2007 Public Hearing

COMMITTEE ASSIGNMENTS:
COURTS OF JUSTICE
FINANCE
SCIENCE AND TECHNOLOGY

There is much to commend in the Draft EIS. It is *much* better than the Draft Siting Analysis released last June. However, I feel like I'm shadow-boxing. For every presentation of the stark reality of transportation needs and of what must be accomplished in an impossibly short time frame found one place in the EIS, elsewhere, there is a counter expression. Such overly optimistic counter expressions might be applicable to BRAC relocations elsewhere, but such rationales are simply not a sound basis for decision-making in the 3rd most congested region in the nation, in a state whose transportation is arguably the most underfunded, and in a robust economy of full employment with one of the highest percentages of two-income households in the nation.

Regional Impact – I urge the assertion be ignored that states there will be no additional regional work trips. That analysis on pgs 4-36 thru 4-37 likens the affect to reshaping a bean bag, stating that, as Army jobs are moved out of leased space in Crystal City, Reston, Bethesda, and so on, those offices will be filled by other workers currently working elsewhere *in this region*. Such an assertion simply does not comport with this region's office vacancy factor. Empty space is filled by a domino effect that does not leave empty space elsewhere. Building 6.2 million square feet of new office space will mean a *commensurate net regional increase* in jobs and therefore in work trips.

Such a net increase in jobs also will swell the region's housing sprawl more than has been assumed. In this robust economy, jobs drive growth. According to a recent George Mason University study, one of the reasons historically that this region has not adequately planned for its transportation needs is that, while job growth has been correctly projected, the number of households that will be created has always been underestimated. "[The] Current Round 6.4A Forecast assumes 2.212 jobs/household... [the] Proposed Round 7 Forecast assumes 1.801 jobs/household...Reality is 1.6 jobs/household." (Washington Airports Task Force 07/06) The increased residential sprawl produced by creating a net increase in workspace for 22,000 jobs – 6.1 percent of the total employment in all of Fairfax County (pg 4-77) – will be substantial.

The conclusion that the regional traffic impact will not be significant also assumes that, by September 2011, 50 percent of the personnel whose jobs will be re-located will shorten their commute by moving closer to EPG/Ft. Belvoir. Unless this assumption has been tested in a region with a comparably high proportion of two-income households, such an assumed re-location is overly optimistic. In fact, almost buried back on pg 4-338

is this very point "An employee's decision to move could depend on factors such as the location of a spouse's place of employment, changing a child's school district, proximity to family and friends, or cost of housing."

Finally, the DEIS assumes that projects on VDOT's 6-Year Plan and on Fairfax County's CIP will be completed "within their respective time frames."(pg 4-62) First, I hope it is understood that being on the 6-Year Plan does not necessarily mean that a project will be completed within 6 years; it only means that some work will be taking place on that project within the next 6 years. With that clarification, a more critical issue is that the DEIS includes these projects in the baseline for determining the impact of adding 22,000 jobs. This is not appropriate. Projects currently on Virginia's 6-Year plan and Fairfax's CIP are being undertaken to add desperately needed regional capacity to alleviate traffic congestion, not to accommodate this massive BRAC relocation, which was not anticipated. Statements in the DEIS such as "hours of congestion along the I-95 corridor are not expected to increase substantially... because the growth in demand would be less than 5 percent"(pg 4-80) should be stricken. 5% more vehicles in a supersaturated solution is total gridlock.

Local Impact – What's puzzling is that just three pages beyond the declaration that a 5% increase in demand is not increase substantial, the DEIS declares "[i]n the areas immediately surrounding EPG, severe congestion lasting 3 to 4 hours would occur if mitigating actions, including transportation improvements, are not taken." This statement is the welcomed tough analysis I applaud.

Sl.3

(con...)

The DEIS then goes on to make a very strong case for – and *hopefully* a commitment to fund under the Defense Access Road Program (pg 4-137) – 14 essential transportation projects (including expanded bus service) costing \$458 million for the Preferred Alternative. I especially want to thank you for following through on my concerns about the critical need for a grade-separated intersection on the Franconia Springfield Parkway near Neuman. It is crucial that the detailed traffic analysis, which justifies all 14 expenditures as a cost of BRAC, not be over-ridden by sweeping summary statements elsewhere in the DEIS.

Indeed, the DEIS is to be commended for recognizing that "state and local agencies require, for development they control, that the developer mitigate those effects with some improvement to the transportation system."(pg 4-137) Such routine, large developer outlays are over and above significant local and state fees and annual taxes that the military will not be paying. In this context, it is, indeed, appropriate that the 14 mitigating transportation improvements be funded by the Army. State and local transportation funding will have to cover a myriad of other improvements necessitated by the BRAC re-location, such as dealing with significant problems that will be exacerbated on Rolling Road and Backlick Road.

Timing – These transportation projects are critical to mitigate “reduced employee productivity, higher commuting costs, and degradation of quality of life...not limited to personnel...[but also] Through commuters and the local community.”(Pg 4-84) These projects are so critical that the relocation of employees to EPG/Fort Belvoir must not proceed until all of the direct bolt-on transportation projects are complete and the transit connections are operative.

If the funding were guaranteed, it is possible that the engineering and design work, right-of-way acquisition, and road construction could be completed in four years. However, it is probable that required Environmental analyses and TPB air quality review will push completion of these transportation projects beyond September 2011. This is especially likely if getting TPB approval depends on the highly debatable assertion in the DEIS that “implementing the Preferred Alternative and the realignment of Fort Belvoir would decrease both the number of vehicles and the total VMT within the region.”(pg 4-155) If this assertion is to be sustained in the air quality review, transit should be revisited, not only for VRE service from the south but also for personnel to be re-located who currently live in Districts A, B, G, H, and I, large portions of which are well-served by transit.

In addition to requirements that may prevent essential transportation projects from being completed by September 2011, the DEIS notes a number of other reviews and approvals that must occur before site development and building construction can begin. These issues involve Chesapeake Bay protection areas, wetland preservation, petroleum storage, solid waste management, asbestos, and hazardous materials.

In view of these required procedures and the necessity to get Congressional funding for congestion mitigation projects, I would request that the Final EIS contain a timetable with specific actions that must be completed by dates certain or trigger a September 2011 occupancy being moved back accordingly. For example, the DEIS states “The peak year of [construction and renovation] expenditures would be 2008” and Table 4.10-9 lays out subsequent expenditures year by year. The construction projects used to generate this table should be listed on a critical path to actuate decision(s) to extend existing leases so that the movement of personnel to EPG and Fort Belvoir will be delayed until building construction and, most importantly, all of the bolt-on congestion mitigation steps are in place.

Acknowledgments – I cannot conclude without commending the steady hand and receptive demeanor of Colonel Lauritzen and likewise commending the desire to explore all options and establish sound factual information displayed by Assistant Secretary of the Army Keith Eastin. They have made this very challenging undertaking as respectful and rational as possible.



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COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY
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Secretary of Natural Resources

David K. Paylor
Director

(804) 698-4000
1-800-592-5482

April 26, 2007

Colonel Brian W. Lauritzen
Garrison Commander, Fort Belvoir
Attn: EIS Comments, Directorate of Public Works
9340 Jackson Loop, Suite 100
Fort Belvoir, Virginia 23060

RE: Draft Environmental Impact Statement and Federal Consistency
Determination for Implementation of 2005 Base Realignment and Closure
(BRAC) Recommendations and Related Army Actions at Fort Belvoir,
Virginia
DEQ-07-032F

Dear Colonel Lauritzen:

The Commonwealth of Virginia has completed its review of the above Draft Environmental Impact Statement ("Draft EIS"). The Department of Environmental Quality ("DEQ") is responsible for coordinating Virginia's review of federal environmental documents prepared pursuant to the National Environmental Policy Act ("NEPA") and responding to appropriate federal officials on behalf of the Commonwealth. DEQ is also responsible for coordinating Virginia's review of federal consistency determinations submitted pursuant to the Coastal Zone Management Act and providing the state's response. The following agencies joined in this review:

Department of Environmental Quality
Department of Game and Inland Fisheries
Department of Conservation and Recreation
Department of Health
Department of Transportation
Marine Resources Commission
Department of Historic Resources
Department of Mines, Minerals, and Energy
Department of Forestry.

In addition, the Northern Virginia Regional Commission and Fairfax County were invited to comment. DEQ understands that Fairfax County is commenting directly to the Army on this matter.

Project Description

The Army intends to update the Fort Belvoir land use plan and carry out base realignment actions mandated by the 2005 enactment of the Base Realignment and Closure ("BRAC") Commission recommendations. The implementation of these actions would result in a net increase of approximately 22,000 people in Fort Belvoir's work force (Draft EIS, pages ES-2 and ES-3, sections ES.4.1. and ES.4.2), along with the redevelopment of approximately 7 million square feet of office and building space (1/31/07 meeting, Army/DEQ and state agencies). The EPG area, situated to the west of Interstate Route 95 and away from the rest of the Fort, would be put to greater use. A number of units, agencies, and activities would be moved to Fort Belvoir from other locations, resulting in 20 construction projects and creating approximately 73 acres of impervious surfaces (Draft EIS, page 2-14, Table 2-3). A "no-action" alternative is presented for comparison with existing conditions (Draft EIS, page ES-6, section ES.5.6 and page 3-14, section 3.5).

The Draft EIS presents three alternative land use plans, each intended to achieve the need for increased space for realigned functions at Fort Belvoir. These are described as:

- the Town Center Alternative, in which most new construction projects would be sited between J.J. Kingman Road on North Post and 12th Street on South Post, leaving the EPG, Davison Army Airfield, and other areas available for future growth after 2011 (pages 3-2 and 3-3, section 3.3.1; see Figures 3.1 and 3.2);
- the City Center Alternative, in which all new facilities would be sited on EPG and a 65-acre parcel nearby known as the GSA Parcel. Leaving North and South Posts available for future growth (pages 3-3 through 3-9, section 3.3.2; see Figures 3.3 and 3.4); and
- the Satellite Campuses Alternative, in which new facilities would be sited on Davison Army Airfield, the North Post golf course, and North and South Posts (pages 3-9 through 3-13, section 3.3.3; see Figures 3.5 and 3.6).

The Draft EIS indicates the Army's determination that any of these alternative strategies would be inadequate by itself, and states the Army's preference for

relocation of the Troop Area from North Post to an industrial part of the South Post, with the present Troop Area becoming "Professional/Institutional" (see Figure 2-4, page 2-10). A status-quo alternative, if delayed implementation is necessary, would be to keep the Troop Area and Industrial Areas where they are (Draft EIS, page 3-13, section 3.3.4).

Specific facility construction and renovation projects are also listed (Draft EIS, page 2-14, Table 2-3) and described (pages 2-17 through 2-24); reference is made to some of these as appropriate in the discussions which follow.

The Draft EIS also contains a federal consistency determination pursuant to the Coastal Zone Management Act (Appendix C).

Environmental Impacts and Mitigation

1. Natural Heritage Resources. The Department of Conservation and Recreation (DCR) has searched its Biotics Data System for occurrences of natural heritage resources in the project area. "Natural heritage resources" are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations. On the basis of this search and its review of the Draft EIS, DCR provides the following guidance for the planning stages of the BRAC action. Upon review of more specific development plans, DCR will be able to provide more detailed recommendations.

(a) Conservation Sites and Related Resources. According to the information in DCR files, several conservation sites are located within the project area. Conservation sites are tools for representing key areas of the landscape that warrant further review for possible conservation action because of the natural heritage resources and habitat they support. Polygons are built around one or more rare plant, animal, or natural communities and are designed to include the element and, where possible, its associated habitat, and buffers or other adjacent land thought necessary for the element's conservation. Conservation sites are given a bio-diversity significance ranking based on the rarity, quality, and number of element occurrences they contain, on a scale of 1-5, 1 being most significant. The conservation site names, bio-diversity ranks, and natural heritage resource(s) of concern associated with the sites are listed below:

- Pohick/Accotink Wetlands Conservation Site- B3 (high significance)
 - coastal plain/piedmont acidic seepage swamp
 - mesic mixed hardwood forest

- tidal freshwater marsh
- sphagnum sprite (*Nehalennia gracilis*, G5/S1S2/NL/NL)
- vetchling (*Lathyrus palustris*, G5/S1/NL/NL)
- a sedge (*Carex vestita*, G5/S2/NL/NL)
- river bulrush (*Schoenopletus Fluviatilis*, G5/S2/NL/NL)
- water-plaintain spearwort (*Ranunculus ambigens*, G4/S1/NL/NL)

- Huntley Meadows- B5 (general significance)
 - Purple milkweed (*Asclepias purpurascens*, G5?/S2/NL/NL)

- Meadow-Thompson Creek Conservation Site- B3 (high significance)
 - mesic mixed hardwood forest

- Area T-17 Ravines Conservation Site- B3 (high significance)
 - Northern Virginia well amphipod (*Stygobromus phreaticus*, G2G3/S1/SOC/NL)

- Dogue Creek Conservation Site- B5 (general significance)
 - Wood turtle (*Glyptemys insculpta*, G4/S2/NL/LT)

(b) *Plant and Insect Species.* Under a memorandum of agreement with the Department of Agriculture and Consumer Services (VDACS), DCR represents VDACS in commenting on potential impacts of projects upon state-listed endangered and threatened plant and insect species.

(i) *Small Whorled Pogonia.* The small whorled pogonia (*Isotria medeoloides*, G2/S2/LT/LE) has also been recently documented at Fort Belvoir. This plant is classified as threatened by the United States Fish and Wildlife Service (USFWS) and as endangered by the Virginia Department of Agriculture and Consumer Services (VDACS). Due to the protected status of small whorled pogonia, DCR recommends that the plant be avoided in planning for development. DCR also recommends that the Army coordinate with USFWS and the Department of Game and Inland Fisheries (DGIF) to ensure compliance with protected species legislation; see "Regulatory and Coordination Needs," item 3, below).

(ii) *Other Plant Species.* According to DCR, Parker's pipewort (*Eriocaulon parkeri*, G3/S2/NL/NL) and river bulrush (*Schoenopletus Fluviatilis*, G5/S2/NL/NL) have also been documented within Fort Belvoir.

(c) *Animal Species: Wood Turtle.* According to DCR, the wood turtle has been documented at the Po Road Bridge and in Accotink Creek. The wood turtle

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is classified as threatened by the Virginia Department of Game and Inland Fisheries (DGIF). Due to the protected status of the wood turtle, DCR recommends coordination with DGIF to ensure compliance with protected species legislation (see "Regulatory and Coordination Needs," item 3, below).

S. 2.2

(d) *Recommendations.* The Department of Conservation and Recreation recommends several measures to mitigate or avoid impacts upon natural heritage resources.

(i) *Avoid Significant Natural Communities.* First, DCR recommends avoidance of the significant natural communities listed above (see *Technical Report for the U.S. Army Fort Belvoir 96-03, 1996*).

(ii) *Avoid Wetlands in the Southwest Training Area.* These wetlands, especially the beaver pond, should be avoided. Training activities in these wetlands could cause significant impacts to their hydrology and affect the sphagnum sprite found there. Avoiding wetland impacts will also protect the viability of the rare wetland plants mentioned above (see item 1(b), above).

S. 2.3

(iii) *Maintain the Seepage Swamp Habitat.*

(iv) *Avoid Training Area T-17.* This area should be avoided because of possibly significant impacts to the Northern Virginia well amphipod; the area includes the only known extant population of this species on a global scale.

(v) *Minimize Impacts to Aquatic Ecosystems.* To minimize adverse impacts to the aquatic ecosystem as a result of the proposed activities, DCR also recommends the implementation of and strict adherence to erosion and sediment control measures during all land-disturbing activities.

2. *Wildlife Resources.* The Department of Game and Inland Fisheries, as the Commonwealth's wildlife and freshwater fish management agency, exercises enforcement and regulatory jurisdiction over wildlife and freshwater fish, including state or federally listed endangered or threatened species, but excluding listed insects. The Department (hereinafter "DGIF") is a consulting agency under the U.S. Fish and Wildlife Coordination Act (16 U.S.C. sections 661 *et seq.*), and provides environmental analysis of projects or permit applications coordinated through the Department of Environmental Quality and several other state and federal agencies. DGIF determines likely impacts upon fish and wildlife resources and habitat, and recommends appropriate measures to avoid, reduce, or compensate for those impacts.

(a) Concerns with regard to the Land Use Plan Update. In connection with the discussions and figures on the proposed Land Use Plan Update, the Department of Game and Inland Fisheries ("DGIF") notes that areas previously designated for outdoor recreation and as environmentally sensitive are to be given designations such as "Community," "Airfield," and "Professional/Institutional" (see Draft EIS, pages 2-2 through 2-7, sections 2.2.1.1 and 2.2.1.2 and Figures 2-1 and 2-2; also page 4-18, section 4.2.2.1). While the Draft EIS states that the newly designated areas could be used for activities not requiring construction and that the environmentally sensitive areas will retain regulatory protection (page 2-7, third bullet paragraph, "Open Space" heading), DGIF is concerned that areas previously designated as open space may be subject to development pressure. The EPG area includes the Accotink drainage, which provides wild habitat that should be protected. DGIF notes that the existing land use plan, retaining sensitive and outdoor space designations, included areas designated for future development; this suggests that the increase of development acreage of approximately 800 acres, in the Preferred Alternative land use plan (see page 4-18, section 4.2.2.1), is not necessary.

S2.4

In addition, DGIF questions whether the change in designation of these areas is consistent with the Integrated Natural Resources Management Plan (INRMP) developed for Fort Belvoir. Under the Sikes Act, there may be a requirement that the state wildlife agency (DGIF) and the U.S. Fish and Wildlife Service be consulted on proposed changes to the Land Use Plan that would alter the designation of areas known to provide habitat for wildlife, particularly threatened and endangered species.

The Draft EIS indicates that the Fort supports some ecologically sensitive and unique areas (page 4-257, section 4.8). DGIF recommends that the Army review the INRMP to ensure that activities proposed for Fort Belvoir are consistent with previously agreed-upon management activities for the wildlife and habitat available on the Fort.

(b) Recommendations on the Land Use Plan Update. As a general matter, the more open space there is, the more wildlife habitat is available and the greater the protection for the watershed. The designation of areas on the Fort as open space and/or natural resource protection areas may, if protected and situated properly within the landscape, provide corridors for wildlife movement and linkages between habitats. Such areas should, in the judgment of DGIF, include the environmentally sensitive areas, wetlands, and riparian buffers consistent with Resource Protection Areas (RPAs; see "Federal Consistency," item 4(a), below).

S2.5

(c) *MWR Family Travel Camp*. Each of the alternative plans includes a proposed MWR ("Morale, Welfare, and Recreation;" see Draft EIS, page 2-14, Table 2-3) Family Travel Camp, to be situated near the shoreline in the southwestern part of South Post (project #20; see Draft EIS, Figures 2-6 (page 2-15), 3-2 (page 3-5), 3-4 (page 3-8), and 3-6 (page 3-12)). This facility may affect waterfowl hunting zone 2, and/or areas that are hunted for deer and turkey. In addition, it might affect bald eagle nesting and/or concentration areas. Accordingly, DGIF recommends that the Army coordinate with DGIF regarding this site, to allow additional review of its impacts on wildlife and hunting opportunities in the area; see "Regulatory and Coordination Needs," item 3, below.

S2.6

(d) *Surface Water Quality Best Management Practices ("BMPs")*. The Draft EIS discusses a number of recommended BMPs but does not commit the Army to avoidance of in-line BMPs (pages 4-232 and 4-233, section 4.7.2.4.1). DGIF supports the use of stormwater management practices and of erosion and sediment controls during construction, but does not support the use of in-line BMPs.

(i) *Stormwater Controls and BMPs; Low-Impact Development*. Stormwater controls should be designed to replicate and maintain the hydrographic condition of the site before the change in landscape. This should include, but not be limited to, use of bio-retention areas and minimizing the use of curb and gutter in favor of grassed swales.

Bio-retention areas (also called rain gardens) and grassed swales are components of Low-Impact Development (LID), as the Draft EIS mentions (page 4-233, section 4.7.2.4.1). They are designed to capture stormwater runoff as close to the source as possible and allow it to slowly infiltrate into the surrounding soil. They benefit natural resources by filtering pollutants and decreasing downstream runoff volumes. DGIF encourages the use of LID practices.

(ii) *Mitigation Measures for In-stream Activities*. If in-stream activities must be undertaken, DGIF recommends the following mitigation measures:

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- conduct any in-stream activities during low or no-flow conditions;
- use non-erodible cofferdams to isolate the construction area;
- block no more than 50% of the streamflow at any given time;
- stockpile excavated material in a manner that prevents its re-entry into the stream;
- restore the original streambed and streambank contours;

- re-vegetate barren areas with native vegetation; and
- implement strict erosion and sediment control measures (see item 7, below).

(iii) Stream Crossings. Due to future maintenance costs and the loss of riparian and aquatic habitat associated with culverts, DGIF prefers stream crossings to be constructed via clear-span bridges. However, if this is not possible, DGIF recommends countersinking any culverts below the streambed at least 6 inches, or using "bottomless culverts," to allow passage of aquatic organisms. In addition, floodplain culverts should be installed to carry bankfull discharges.

(e) Wildlife Habitat Protection.

(i) Habitat Impacts. As the Draft EIS states (page 4-269, section 4.8.2.1.2), many areas currently vegetated, and therefore providing wildlife habitat, will be converted into developed areas pursuant to the BRAC mandate. Development of these areas will result in lost habitat connectivity and increase the likelihood of invasive vegetation and possibly invasive wildlife species in the area. DGIF recommends preservation of like areas as mitigation for loss of this habitat, and development of an invasive species control and/or management strategy to address the matter.

(ii) Animal Species. As the Draft EIS indicates (pages 4-261 through 4-264, section 4.8.1.4), Fort Belvoir habitat supports a number of species of mammals, birds, reptiles, and amphibians. DGIF recommends the maintenance of open space on the Fort for these species. In particular, the provision of stop-over or resting habitat is very important in Northern Virginia. Thus in addition to recommending adherence to the management practices in the Fort Belvoir INRMP (see above, item 2(a)), the Department of Game and Inland Fisheries recommends the following, to the greatest extent practicable:

- maintaining wooded lots
- minimizing impacts upon forests, streams, and wetlands
- maintaining riparian buffers.

In addition, DGIF recommends continued survey activities throughout the Fort to determine what species exist there, what habitat they are using, and to monitor any changes in these populations as the BRAC activities proceed. DGIF also recommends coordination with its regional wildlife biologists so that wildlife populations can be managed through hunting activities; see "Regulatory and Coordination Needs," item 3, below.

S2.8

(f) *Anadromous Fish Use Areas: Recommendations.*

(i) *Listing.* The following have been designated Anadromous Fish Use Areas:

- Accotink Creek
- Dogue Creek
- Pohick Creek
- Potomac River.

Anadromous fish are particularly sensitive to sedimentation and noise (percussion, vibration). Activities that create such stressors may result in adverse impacts upon anadromous fish species, and upon their ability to migrate through and spawn in these waters.

(ii) *Recommendations.* DGIF recommends coordination by the Army for any projects which might give rise to impacts on these waterways; see "Regulatory and Coordination Needs," item 3, below. Recommendations resulting from this coordination are likely to include time-of-year restrictions or activity restrictions for the protection of these areas. It is important that these waters remain free of impediments and that the water quality be maintained.

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(g) *Endangered and Threatened Species.* According to the Department of Game and Inland Fisheries, several species are of particular concern at Fort Belvoir. This discussion lists the species, their status, and where they are found and provides recommendations and requirements for the protection.

(i) *Bald Eagles.* Bald eagles (listed as threatened by state and federal governments) have nests known to be in the southwest area and the South Post. In addition, much of the Potomac River shoreline, including the shores of Accotink Bay and Pohick Bay, are designated Concentration Zones for this species.

According to the *Bald Eagle Protection Guidelines for Virginia* (available on the Department of Game and Inland Fisheries web site, www.dgif.virginia.gov), any projects within 1,320 feet (0.25 mile) of a bald eagle nest may result in impacts upon the species. Projects located within this zone may be subject to time-of-year restrictions, activity restrictions, or other conservation measures. The concentration zone is also afforded some protection. Moreover, any activity within 750 feet of the shoreline may result in impacts upon the bald eagle, and this area may require the same project limitations as the 1/4 mile boundary above.

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The proposed Family Travel Camp appears to be proposed for areas that might include bald eagle concentration (foraging) and nesting areas (Draft EIS, page 2-24, section 2.2.2.3; see item 2(c), above); thus this project might affect the species. It is particularly important, therefore, that the Army consult with DGIF regarding this project in particular, as well as consulting with DGIF and the U.S. Fish and Wildlife Service for any projects within 750 feet of the shoreline and, in any case, for projects within 1/4 mile of bald eagle nests. See "Regulatory and Coordination Needs," item 3, below.

(ii) *Wood Turtles*. Wood turtles (listed as threatened by the state government) have been documented on the North Post, Dogue Creek, and an unnamed tributary to Dogue Creek. The Creek and its tributary have been designated as Threatened and Endangered Species Waters due to the presence of the wood turtle. Wood turtles have also been known from the Accotink drainage, although none have been documented from Accotink Creek on Fort Belvoir. Wood turtles use clear brooks and streams during hibernation, but also wander in riparian areas for foraging and nesting during warmer months.

For projects likely to affect these waters and/or riparian areas within 600 feet of them, the Army should coordinate with the Department of Game and Inland Fisheries (see "Regulatory and Coordination Needs," item 3, below). DGIF is likely to recommend that the Army, for any such project:

- Adhere to time-of-year restrictions for certain activities;
- Educate contractors regarding the wood turtle;
- Undertake survey activities; and/or
- Follow other conservation recommendations.

In addition, DGIF recommends that the Army maintain at least a 100-foot riparian buffer for all streams and wetlands, and a 600-foot buffer for streams known to support wood turtles.

(iii) *Peregrine Falcon*. The peregrine falcon (listed as threatened by the state government) may occur at Fort Belvoir, as the Draft EIS indicates (page 4-266, section 4.8.1.5.3), but DGIF has not currently documented any nesting sites on the Fort, and does not anticipate any impacts to this species from BRAC developments.

(iv) *Northern Virginia Well Amphipod*. The Northern Virginia well amphipod, a federal species of concern (Draft EIS, page 4-266, section 4.8.1.5.5), has been documented on the South Post. Threats to this species

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include groundwater degradation. The species and its habitat should be considered as BRAC actions proceed.

(v) *Shortnose Sturgeon*. The shortnose sturgeon is known in the Potomac River. The recommendations for anadromous fish waters (see item 2(f)(ii), above) also apply for the protection of this species.

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(h) *Additional Wildlife Information*. DGIF maintains a data base of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters, that may contain information not documented by DCR (item 1, above). Access to this data base may be obtained through the DGIF web site:

http://www.dgif.virginia.gov/wildlife/info_map/index.html

Questions on this web site may be addressed to the Department of Game and Inland Fisheries (Shirl Dressler, telephone (804) 367-6913).

3. Air Quality.

(a) *General Comments*. Fort Belvoir is in the Washington Metropolitan Area, which has been designated a non-attainment area for two National Ambient Air Quality Standards ("NAAQS"), specifically the 8-hour ozone standard and the fine particulate standard. Because of this non-attainment status, a general conformity analysis for the proposed BRAC projects is required by section 176(c) of the federal Clean Air Act, according to DEQ's Air Quality Division.

(i) *Requirements*. The ozone precursor emissions increases from the proposed projects will exceed the general conformity thresholds for the area. For this reason, a determination must be made that the action conforms to the applicable air quality plan and supports the overall goal of air quality standard compliance in the area. Accordingly, project emission increases must be directly offset by equivalent reductions, or otherwise accounted for in the regional air quality planning process. The construction phase of the BRAC projects coincides with a period in which the Washington area must demonstrate compliance with both the 8-hour ozone and the fine particulate matter standards.

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(ii) *Shortcomings in the Draft EIS*. The Draft EIS offers no proposed mitigation measures to lessen the impact of construction emissions during the critical attainment period mentioned above (item 3(a)(i)). There is also no discussion of toxic air pollutant emissions and impacts; at a minimum, the

Final EIS should include an estimate of current and future total hazardous air pollutant emissions, along with an evaluation of regulatory applicability.

The Draft EIS and conformity analysis (Appendix E) identifies stationary source equipment and motor vehicles as the only sources of operational emission increases from the projects. There is no mention of anticipated emissions increases in sources such as consumer products, solvent usage, gasoline distribution, landscaping, aircraft operations, and perhaps others. The Final EIS should address all sources of air pollution and protected emissions increases.

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(iii) *Phasing and Discussion.* The impacts and emissions increases from the projects occur in distinct phases and from several air pollution source categories. Therefore, the remaining air quality discussion is categorized in the same manner, i.e., temporary construction impacts and operation impacts.

(b) *Construction Phase.*

(i) *Impacts.* The temporary air pollutant increases from the five-year construction phase are by far the largest in terms of mass emissions, with the largest impact occurring in 2010 (374 tons of oxides of nitrogen (NO_x) and 238 tons of volatile organic compounds (VOC)). Lesser, but still significant, levels are predicted for each year during the period from 2007 to 2011. In addition to the coinciding period of demonstrating compliance with the NAAQS, the project area is generally upwind of one of the worst-case ozone monitors in the non-attainment area, located at Mount Vernon. This monitor has an ozone design value of 90 parts per billion, the highest in Northern Virginia.

(ii) *Conformity.* The Army proposes to demonstrate conformity for the construction phase and resulting emissions by comparing them to the current 1-hour and pending 8-hour ozone State Implementation Plan (SIP) regional emission estimates for non-road (NO_x) and area (VOC) sources to demonstrate that they are:

- 1) not significant at the regional level, and
- 2) can be reasonably assumed to be included in the regional estimates for non-road and area sources.

While previous EPA actions may have set precedents for using this method, the method has not yet been accepted by EPA Region III for the purpose of demonstrating general conformity for this particular project and situation. The Army should therefore continue to explore all available means to demonstrate

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conformity for the construction phase in the event the proposed method is not acceptable.

(iii) Recommendations. DEQ's Air Quality Division recommends that the Army include, and commit to implement, a construction performance contract plan in the Final EIS. The plan should include all reasonable emission control measures to minimize the impact of the construction activities related to the BRAC projects. The measures to be considered should include, but not be limited to:

1. The exclusive use of new diesel engine standard-compliant or control device-retrofitted heavy construction equipment;
2. Strict restriction of equipment idling times; and
3. Restriction or prohibition of construction on days when high ozone levels are predicted in the area. At a minimum, this should be done on predicted "Code Red" ozone days.

(iv) Regulatory Requirements for Construction. The construction projects should be accomplished in full compliance with current and pending Virginia requirements, through the use of compliant practices and/or products. See "Regulatory and Coordination Needs," item 1(a), below.

(b) Operations Phase. Most air quality impacts from the completed Fort Belvoir projects will be generated from increased local motor vehicle traffic and stationary source equipment operation to support the new facilities on base.

(i) Evaluation of Transportation Impacts. To fully evaluate air quality impacts from the Fort Belvoir BRAC projects and other BRAC undertakings in the Washington area, the best and most current employment and traffic projections must be compiled and provided to the Metropolitan Washington Council of Governments' Transportation Planning Board ("TPB"). These projections are then incorporated into the next regional transportation conformity determination for the Washington, D.C. non-attainment area. In this way, the overall transportation impact of the BRAC projects can be determined and demonstrated to conform to the SIP.

(ii) Mitigation of Transportation Effects. DEQ's Air Quality Division recommends that all reasonable congestion mitigation practices should be employed to reduce transportation impacts on air quality; these should include ozone action days, codes orange and red telecommuting, and public transportation.

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(iii) *Evaluation of Stationary Source Impacts.* Stationary source equipment to support the new facilities contemplated under BRAC will be subject to different regulatory requirements, depending on the final project configuration. Requirements in the Virginia Regulations for the Control and Abatement of Air Pollution for major new source review for non-attainment areas (Article 9, 9 VAC 5-80-2000 et seq.) or minor new source review (Article 6, 9 VAC 5-80-1100 et seq.) will apply. The current estimate of the preferred alternative predicts that emissions will be below the major source threshold; therefore, minor new source review would apply. However, DEQ would still be required to find that the emissions increases are accounted for in the applicable SIP. See "Regulatory and Coordination Needs," item 1, below.

(iv) *Mitigation of Stationary Source Effects.* According to DEQ's Air Quality Division, the Army should consider control devices and/or strategies to further reduce the emissions from stationary source equipment, even if such devices would not be required by the applicable permitting process.

4. *Solid and Hazardous Waste Management.* According to DEQ's Waste Division, both solid and hazardous waste issues and sites were addressed in the Draft EIS, and the Draft EIS included a search of waste-related data bases.

(a) *Findings.* Fort Belvoir is listed in several ways under applicable waste management laws and regulations:

- The Fort is on the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) list (identification number VA5210020082) as Fort Belvoir, Fairfax County, Virginia (not on the National Priorities List (NPL));
- The Fort is a large-quantity generator of hazardous waste, as well as a treatment, storage, and disposal facility (identification number VA7213720082), listed as U.S. Army Engineering Center, Fort Belvoir, LQG and TSD.

According to DEQ's Northern Virginia Regional Office, the GSA Parcel (EPA identification number VA4470039336) was returned to compliance on February 15, 2007. All 12 violations were resolved.

Fort Belvoir has several solid waste sites, listed as follows:

- U.S. Army, Fort Belvoir, PBR 164, RMW (regulated medical waste) Steam Sterilizer;

- U.S. Army, Fort Belvoir, PBR 248, RMW Steam Sterilizer
- U.S. Army, Fort Belvoir, SWP 308, Closed Sanitary Landfill; and
- U.S. Army, Fort Belvoir, SWP 490, Closed CDD (Construction demolition and debris) Landfill.

(b) Information on Waste Sites. The following web sites may be helpful in locating additional information for these identification numbers:

- http://www.epa.gov/echo/search_by_permit.html
- http://www.epa.gov/enviro/html/rcris/rcris_query_java.html

(c) Historical Records Review Highlights. A Historical Records Review was completed by the Army at Fort Belvoir in March 2006, according to DEQ's Waste Division, Federal Facilities Restoration Program Office. This review is a step in the remediation process pursuant to the federal Comprehensive Environmental Response, Compensation, and Liability Act. The Army submitted a work plan in September 2006 in order to determine the presence or absence of munitions and explosives of concern (MEC) and munitions constituents (MC) that may remain from earlier activities at these sites and that may pose a threat to human health and/or the environment. See "Regulatory and Coordination Needs," item 6(b), below.

(i) Results: Military Munitions Restoration Program (MMRP) Sites. The Historical Records Review indicates 21 sites eligible for the Military Munitions Restoration Program, of which 20 are on the Main Post. The additional site is on the EPG, which itself contains 10 range areas.

(ii) Results: Solid Waste Management Units (SWMUs). The Historical Records Review indicates 19 SWMUs on the Main Post. One such unit, SWMU A-12, Accotink Landfill, is on both the Grenade Court and the Small Arms Range Complex Range Areas.

(iii) Other Results of Historical Records Review. The U.S. Army Toxic and Hazardous Materials Agency completed an environmental baseline study at the EPG. The Phase II portion of the baseline study indicated 44 SWMUs and 12 Areas of Potential Concern at the EPG.

(d) Solid Waste Permitting Status. The Fort has four solid waste management facilities that have permits or are in the process of obtaining them from DEQ. These facilities, and their status, are:

- SWP 308, Cullum Road Sanitary Landfill. This is closed and in post-closure monitoring.
- SWP 490, Theote Road C&D (Construction and demolition) Landfill. Same status as previous landfill.
- PBR 164, Dewitt Hospital, which performs steam sterilization of regulated medical waste.
- DCEETA. Currently applying for a permit-by-rule for an incinerator.

See "Regulatory and Coordination Needs," item 6(c), below.

(e) *Demolition or Renovation of Structures.* Structures to be demolished, renovated, or removed should be checked for asbestos-containing materials and for lead-based paint prior to demolition. Appropriate measures must be taken if either or both substances are found; see "Regulatory and Coordination Needs," item 6(d), below.

(f) *Child Care Facility Construction.* The Army proposes to build two new child-care facilities on the EPG (Child Development Centers #55661 and 55662) (Draft EIS, page 2-21, section 2.2.2.3). The risk assessments to be performed for this area, especially for child-care facilities, should include the appropriate risk pathways and assumptions used for child-care facilities, according to DEQ's Northern Virginia Regional Office.

(g) *Pollution Prevention.* DEQ encourages the Army to implement pollution prevention principles in all construction projects and facilities. These principles include reduction of waste materials at the source, re-use of materials, and recycling of solid wastes. Hazardous waste generation should also be minimized, and hazardous wastes handled appropriately under state and federal law. See also item 14, below.

DEQ's Northern Virginia Regional Office notes that approximately 8,410 tons of construction and demolition (C&D) debris will be generated from the proposed action and disposed of at various landfills in the area (Draft EIS, page 4-458, section 4.15). To reduce the impact of this large quantity of C&D waste, the Army should promote the beneficial re-use or recycling of it by sending it to a material recovery facility instead of to landfills.

5. *Water Quality and Wetlands.*

(a) *Impacts.* The Draft EIS makes reference to potential "increases in stormwater runoff, associated physical effects, and associated pollutants from land disturbance activities" (page ES-10, section ES.6.6). The project

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alternatives are likely to affect Chesapeake Bay Resource Protection Areas (RPAs) (see "Federal Consistency...", item 4(a), below) as follows:

Satellite Campus Alternative --	40 acres;
Preferred Alternative --	14 acres;
City Center Alternative --	18 acres.

In addition, the document shows a number of riparian areas within 35 feet of an intermittent or perennial stream, and states that new development must be minimized in such areas (Draft EIS, page 4-223, section 4.7.1.5.1, referring to Figure 4.7-1, page 4-205). The Department of Conservation and Recreation's Division of Chesapeake Bay Local Assistance notes that Resource Protection Areas (RPAs) include "a buffer area not less than 100 feet in width located adjacent to and landward of" RPA features (Chesapeake Bay Preservation Area Designation and Management Regulations, 9 VAC 10-20-10 *et seq.*, specifically 9 VAC 10-20-80 B.5.; see also "Federal Consistency...", item 4(a), below).

(b) *Permitting.* The Draft EIS indicates that surface waters are present within project limits, and impacts to surface waters are proposed. Accordingly, a Virginia Water Protection Permit will be required for the projects. See "Regulatory and Coordination Needs," item 2, below.

(c) *General Impacts.* The primary impacts on water resources from these projects will be caused by increases in impermeable surfaces, changes to stormwater hydrographs, erosion and sedimentation increases during construction, and increases in non-point source runoff after construction. DEQ's Division of Water Resources does not have a preference among the alternatives described in the Draft EIS.

(d) *Wetlands Protection and Mitigation.* In general, DEQ recommends that the section 404(b)(1) guidelines be followed, and that stream and wetland impacts be avoided to the maximum extent practicable. To minimize unavoidable impacts to wetlands and waterways, DEQ recommends the following practices:

- Operate machinery and construction vehicles outside of stream-beds and wetlands; use synthetic mats when in-stream work is unavoidable;
- Erosion and sedimentation controls should be designed in accordance with the most current edition of the *Virginia Erosion and Sediment Control Handbook* (see "Regulatory and Coordination Needs," item 4, below). These controls should be in place prior to clearing and grading, and maintained in good working order to minimize impacts to

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State waters. The controls should remain in place until the area is stabilized.

- Place heavy equipment, located in temporarily impacted wetland areas, on mats, geotextile fabric, or use other suitable measures to minimize soil disturbance, to the maximum extent practicable.
- Restore all temporarily disturbed wetland areas to pre-construction conditions and plant or seed with appropriate wetlands vegetation in accordance with the cover type (emergent, scrub-shrub, or forested). The Army should take all appropriate measures to promote re-vegetation of these areas. Stabilization and restoration efforts should occur immediately after the temporary disturbance of each wetland area instead of waiting until the entire project has been completed.
- Place all materials which are temporarily stockpiled in wetlands, designated for use for the immediate stabilization of wetlands, on mats, geotextile fabric in order to prevent its entry into State waters. These materials should be managed in a manner that prevents leachates from entering state waters and must be entirely removed within thirty days following completion of the construction activity. The disturbed areas should be returned to their original contours, stabilized within thirty days following removal of the stockpile, and restored to the original vegetated state.
- All non-impacted surface waters within the project or right-of-way limits that are within 50 feet of any clearing, grading, or filling activities should be clearly flagged or marked for the life of the construction activity within that area. The Army should notify all contractors that these marked areas are surface waters where no activities are to occur.
- Measures should be employed to prevent spills of fuels or lubricants into state waters.

6. *Historic Structures and Archaeological Resources.* According to the Department of Historic Resources (the State Historic Preservation Office for purposes of compliance with section 106 of the National Historic Preservation Act), there are a number of significant historic, architectural, and archaeological resources on or near Fort Belvoir that are listed in or eligible for the National Register of Historic Places. The Draft EIS summarizes "long-term minor adverse impacts" as including "direct and indirect effects to [historic resources'] integrity (i.e., physical harm or change) and direct visual effects to their setting" (Draft EIS, page 4-300, section 4.9.2.2), and acknowledges the Fort Belvoir Historic District (Draft EIS, Table 4.9-6, page 4-301, section 4.9.2.2), *inter alia*.

(a) *Historic Properties.* According to the Department of Historic Resources, the historic, architectural, and archaeological resources (listed or eligible, as above) include:

- the site of the Belvoir Mansion Ruins and adjacent Fairfax Grave Site (Site 44FX0004);
- the Fort Belvoir Historic District;
- Pohick Church
- Woodlawn Plantation;
- Alexandria Friends' Meeting House;
- Woodlawn Historic District;
- George Washington Gristmill;
- Gunston Hall; and
- Mount Vernon.

Among these sites, the National Park Service has given its highest recognition, that of National Historic Landmark, to Woodlawn Plantation, Mount Vernon, and Gunston Hall.

(b) *Historic Properties identified in the Draft EIS.* The Draft EIS lists the following properties that may be adversely affected by the BRAC projects:

- Fort Belvoir Historic District;
- Friends' Meeting House and Burial Ground;
- One eligible archaeological site; and
- One potentially eligible archaeological site.

The Department of Historic Resources (DHR) believes that the BRAC actions have the potential to adversely affect more historic properties than just these. In some cases, the impacts that BRAC and related activities would have cannot be anticipated at this time, because implementation plans for the BRAC projects are not fully known. As an example, the Department of Historic Resources understands that the Army is not certain which buildings within the Fort Belvoir Historic District will house specific tenant agencies. In the absence of that knowledge, it is impossible to assess the impacts of possible alterations of the buildings, to address the missions of new tenants, upon contributing buildings within the Historic District.

(c) *NEPA and Impact Analysis.* The National Environmental Policy Act (NEPA) requires federal agencies to identify and evaluate the full range of impacts that their actions may have on the environment. DHR indicates that the rapid influx of approximately 22,000 additional personnel at the Fort will place

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additional strain on an already overburdened transportation infrastructure in Fairfax County (see item 13, below, and the separate comments from Fairfax County). The need for new and affordable housing attributable to the Fort's expansion is likely to require zoning changes, new construction, installation of utilities, and associated development; all of this is likely to affect historic properties beyond the boundaries of Fort Belvoir. Accordingly, the EIS must consider not only the direct consequences of BRAC activities, but also secondary outcomes that might affect cultural resources. These indirect and secondary effects might include:

- auditory and visual impacts from increased automobile traffic;
- new development in communities serving Fort Belvoir;
- diminished access to heritage destinations; and
- new road construction needed to support the increase in Fort population.

(d) Transportation Impacts. DHR states that, as described in the Draft EIS, transportation analysis and design study will continue throughout the planning phase of the BRAC actions, and more details are likely to emerge as the planning process matures. For the purpose of gathering information for the Draft EIS, the Army used the regional travel demand model maintained by the Metropolitan Washington Council of Governments to estimate traffic impacts. While this method may be expedient for the purposes of the Draft EIS, DHR believes that the implications of BRAC on the transportation infrastructure are likely to be greater than first anticipated. Negative effects to historic properties from increased traffic, such as new road construction, will need to be addressed in the Final EIS and mitigated for in the Section 106 process. See also item 13, below, and the separate comments from Fairfax County.

(e) Archaeological Resources. The Department of Historic Resources indicates that additional archaeological evaluation (Phase II investigation) may be necessary to determine the National Register eligibility of sites currently considered potentially eligible (see Draft EIS, page 4-303, section 4.9.2.3.2). The Department understands that Phase II evaluation of Site 44FX1933 has been completed; the Army is requested to submit two copies of the evaluation report (see "Regulatory and Coordination Needs," item 7, below).

The Department of Historic Resources is also interested in the status of the recommendation for archaeological potential, or lack thereof, for the GSA Parcel (see Draft EIS, page 4-289, section 4.9.1.3.1 and page 4-308, section 4.9.4.1.1). See "Regulatory and Coordination Needs," item 7, below.

SR. 22

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7. Erosion and Sediment Control; Stormwater Management. Federal agencies and their authorized agents conducting regulated land-disturbing activities on private and public lands in the state must comply with the Virginia Erosion and Sediment Control Law and its implementing regulations, the Virginia Stormwater Management Law and its implementing regulations, and other applicable federal non-point source pollution mandates (e.g., section 313 of the Clean Water Act, and Federal Consistency requirements (see "Federal Consistency..." below) under the Coastal Zone Management Act). The sponsoring federal agency, in this case the Army, is ultimately responsible for achieving project compliance through oversight of on-site contractors, regular field inspection, prompt action against non-compliant sites, and/or other mechanisms consistent with agency policy. See "Regulatory and Coordination Needs," item 4, below.

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(a) Erosion and Sediment Control. Erosion and Sediment Control requirements apply to land-disturbing activities that affect 2,500 square feet or more (in Chesapeake Bay Preservation Areas such as the project area; see "Federal Consistency..." item 4, below). Accordingly, the Army should prepare and implement Erosion and Sediment Control Plans for this project to ensure compliance with state law. See "Regulatory and Coordination Needs," item 4, below. The Erosion and Sediment Control requirement is an Enforceable Policy of the Virginia Coastal Resources Management Program; see "Federal Consistency..." item 5, below.

(b) Stormwater Management. Stormwater Management requirements apply to land-disturbing activities that affect a land area of one (1) acre or more. As with the Erosion and Sediment Control Plan, the Army should prepare and implement a Stormwater Management Plan for the project to ensure compliance with state law. The *Virginia Stormwater Management Handbook* published by the Department of Conservation and Recreation should be consulted for specific designs and standards. See "Regulatory and Coordination Needs," item 4, below.

S2.26

(c) VPDES Stormwater Management General Permit. Development projects which disturb a land area of one acre or more, or projects disturbing between 2,500 square feet and less than 1 acre in Chesapeake Bay Preservation Areas (see "Federal Consistency..." item 4, below) require coverage under the Virginia Pollutant Discharge Elimination System (VPDES) Stormwater General Permit for Construction Activities. See "Regulatory and Coordination Needs," item 5, below.

8. *Outdoor Recreation.* According to the Department of Conservation and Recreation, the responsibilities of Fairfax County in regard to recreational resources do not extend to federal government facilities. For this reason, the Army must provide recreational facilities to meet the needs of personnel assigned to Fort Belvoir. The Department of Conservation and Recreation supports full development and the upgrades to the MWR Family Travel Camp (Draft EIS, page 2-24).

(a) *Comments on Draft EIS.* The Draft EIS mentions trail systems and open spaces, but does not mention gyms, pools, activity centers, and ball fields. These features contribute to the quality of life in all communities, according to DCR. The Final EIS should include a recreation section outlining all indoor and outdoor recreation needs (see Draft EIS, pages 1-7 and 1-8, section 1.4.3).

(b) *Recommendations.* The Department of Conservation and Recreation has the following recommendations in regard to recreation facilities and plans:

- The Final EIS should reflect a plan for how the realigned Fort would provide for recreational needs of 22,000 additional personnel and their families.
- Evaluate the on-base alternatives to vehicular travel by assessing trails for walking and bicycling.
- Evaluate potential passive recreation trails in the environmental corridors discussed in the Draft EIS (see, for example, page 4-11, section 4.2.1.4.1).
- Add gyms, pools, activity centers, and ball fields into the design of the newly realigned Fort.
- Develop a plan for alternative transportation (walking and bicycling) to connect all developed portions of the Fort.

9. *Water Supply and Wastewater.* All potable water is purchased from the Fairfax County Water Authority, according to the Department of Health. Expanded utilities must comply with the Waterworks Regulations (12 VAC 5-590-10 et seq.) and the Sewage Collection and Treatment Regulations (9 VAC 25-790). See "Regulatory and Coordination Needs," item 10, below for contact information.

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10. Forest and Tree Protection. The Department of Forestry states that it finds limited impact from this project to the forest resources of the Commonwealth.

In order to protect trees in the project area that are not slated for removal from the effects of construction activities associated with this project, the proponent should mark and fence them at least to the dripline or the end of the root system, whichever extends farther from the tree stem. Marking should be done with highly visible ribbon so that equipment operators see the protected areas easily.

Parking and stacking of heavy equipment and construction materials near trees can damage root systems by compacting the soil. Soil compaction, from weight or vibration, affects root growth, water and nutrient uptake, and gas exchange. The protection measures suggested above should be used for parking and stacking as well as for moving of equipment and materials. If parking and stacking are unavoidable, the Army should use temporary crossing bridges or mats to minimize soil compaction and mechanical injury to plants.

Any stockpiling of soil should take place away from trees. Piling soil at a tree stem can kill the root system of the tree. Soil stockpiles should be covered, as well, to prevent soil erosion and fugitive dust.

Questions on tree protection may be directed to the Department of Forestry (Todd Groh, telephone (434) 977-1375, extension 3344).

11. Mineral Resources. According to the Department of Mines, Minerals, and Energy, the BRAC projects at Fort Belvoir will not affect mineral resources.

12. Natural Area Preserves. The Department of Conservation and Recreation indicates that there are no state Natural Area Preserves in the vicinity of the projects.

13. Roads and Transportation. According to the Virginia Department of Transportation (VDOT), the travel forecasting methodology used by the Army's consultant was coordinated with VDOT staff. Given the limited amount of detailed data available, the assumptions are reasonable, in the judgment of VDOT. The Final EIS could address the impact of security checks on queuing, and proposed mitigation measures, in greater detail to provide assurance that such required checks will not adversely affect mainline traffic.

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In its detailed comments on the Draft EIS (enclosed with VDOT letter), VDOT expresses several concerns regarding the impact of increased vehicle traffic upon roads and the traffic situation in the area. The situation appears to warrant careful consideration by the Army in the Final EIS and in its planning for the BRAC developments. Several specific concerns appear, in VDOT's judgment:

- The impact on traffic caused by consultants and other people doing business with Fort Belvoir agencies (Draft EIS, page 4-79);
- The impact of security checks on vehicles entering Fort Belvoir on the traffic of surrounding roads during rush hours (Draft EIS, page 4-83, first paragraph);
- The "rideshare facility" needs more description, including location, nature, means of access, security procedures, and whether there will be a bus terminal or transfer station with it (Draft EIS, page 4-85, section 4.3.44);
- Greatly expanded transit service should be considered as a mitigation option, according to VDOT, and it might include shuttle service to the Franconia-Springfield station which now serves Metro and Virginia Rail Express trains (Draft EIS, page 4-88).

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For additional insights, see the enclosed VDOT letter and comments.

14. Pollution Prevention. DEQ advocates that principles of pollution prevention be used in all construction projects as well as in facility operations. Effective siting, planning, and on-site Best Management Practices (BMPs) will help to ensure that environmental impacts are minimized. However, pollution prevention techniques also include decisions related to construction materials, design, and operational procedures that will facilitate the reduction of wastes at the source. We have several pollution prevention recommendations that may be helpful in constructing or operating the Fort Belvoir BRAC projects:

- Consider development of an Environmental Management System (EMS). An effective EMS will ensure that the proposed facility is committed to minimizing its environmental impacts, setting environmental goals, and achieving improvements in its environmental performance. DEQ offers EMS development assistance and recognizes facilities with effective Environmental Management Systems through its Virginia Environmental Excellence Program.

- Consider environmental attributes when purchasing materials. For example, the extent of recycled material content, toxicity level, and amount of packaging should be considered and can be specified in purchasing contracts.
- Consider contractors' commitments to the environment (such as an EMS) when choosing contractors. Specifications regarding raw materials and construction practices can be included in contract documents and requests for proposals.
- Choose sustainable materials and practices for infrastructure construction and design. These could include asphalt and concrete containing recycled materials, and integrated pest management in landscaping, among other things.
- Integrate pollution prevention techniques into facility maintenance and operation, to include the following: inventory control (record-keeping and centralized storage for hazardous materials), product substitution (use of non-toxic cleaners); and source reduction (fixing leaks, energy-efficient HVAC and equipment). Maintenance facilities should be designed with sufficient and suitable space to allow for effective inventory control and preventive maintenance.

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DEQ's Office of Pollution Prevention provides information and technical assistance relating to pollution prevention techniques and EMS. If interested, the Army may contact that Office (Tom Griffin, telephone (804) 698-4545).

15. Regional and Local Comments. Fairfax County is commenting directly to the Army on this Draft EIS. The Northern Virginia Regional Commission was invited to comment.

Federal Consistency under the Coastal Zone Management Act

Pursuant to the Coastal Zone Management Act of 1972, as amended, federal activities located inside or outside of Virginia's designated coastal management area that can have reasonably foreseeable effects on coastal resources or coastal uses must, to the maximum extent practicable, be implemented in a manner consistent with the Virginia Coastal Resources Management Program (VCP). The VCP consists of a network of programs administered by several agencies. The DEQ coordinates the review of federal consistency determinations with agencies administering the Enforceable and Advisory Policies of the VCP.

DEQ published a public notice of this review from March 9, 2007 through March 30, 2007. No comments were received from the public.

Based on the information submitted in the Draft EIS (which contains the consistency determination in Appendix C) and the comments of agencies administering the enforceable policies of the Virginia Coastal Resources Management Program (VCP), the Commonwealth of Virginia objects to the federal consistency determination for the proposed BRAC projects at this time. Pursuant to the Federal Consistency Regulations, 15 CFR Part 930, section 930.43(b), this objection is based on insufficient information needed to determine the consistency of the projects with the Air Pollution Control enforceable policy of the VCP.

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Required Information Necessary to Determine Consistency with the Air Pollution Control Enforceable Policy of the VCP

Air Pollution Control: General Conformity. As DEQ's Air Quality Division has indicated (see "Environmental Impacts and Mitigation," item 3(a)(i) above), a general conformity analysis is required for the BRAC projects at Fort Belvoir because the Washington Metropolitan Area, of which Fort Belvoir is a part, is a non-attainment area for two criteria pollutants: the 8-hour ozone standard and the fine particulate standard of the National Ambient Air Quality Standards (NAAQS) (see section 176(c) of the federal Clean Air Act). Analysis by the Air Quality Division indicates that the emission of ozone precursors attributable to the BRAC projects will exceed the general conformity thresholds for the area. For this reason, a determination must be made that the proposed action conforms to the applicable air quality plan and supports the overall goal of air quality standard compliance in the area. To achieve this, the project emission increases must be directly offset by equivalent reductions, or otherwise accounted for in the regional air quality planning process.

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(a) *Construction Phase Emissions.* As indicated above ("Environmental Impacts and Mitigation," item 3(a)(i), above), the construction phase of the BRAC undertaking coincides with a time period in which the Washington area must demonstrate compliance with both the 8-hour ozone and the fine particulate matter NAAQS. However, the Draft EIS offers no proposed mitigation measures to lessen the impact of construction emissions during the critical attainment period. Moreover, the Army's proposed method of demonstrating conformity for the construction phase of the projects has not yet been accepted by EPA Region III for the purpose of demonstrating conformity for this particular project and situation.

DEQ's Division of Air Quality believes that the Army should include, and commit to implement, a construction performance contract plan in the Final EIS. That plan should include all reasonable emission control measures to minimize

the impacts of construction activities related to the project. The measures to be considered should include, but not be limited to:

- The exclusive use of new diesel engine standard-compliant or control device-retrofitted heavy construction equipment;
- Strict restriction of equipment idling times; and
- Restriction or prohibition of construction on days when high ozone levels are predicted in the area. At a minimum, this should be done on predicted "Code Red" ozone days.

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(b) Operational Phase Emissions. To fully evaluate air quality impacts from the Fort Belvoir BRAC projects and other BRAC undertakings in the Washington area, the best and most current employment and traffic projections must be compiled and provided to the Metropolitan Washington Council of Governments' Transportation Planning Board. These projections are then incorporated into the next regional transportation conformity determination for the Washington, D.C. non-attainment area. In this way, the overall transportation impact of the BRAC projects can be determined and demonstrated to conform to the State Implementation Plan (SIP).

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(c) Applicable Enforceable Policies. The Air Pollution Control enforceable policy of the Virginia Coastal Resources Management Program includes the requirements of the federal Clean Air Act, including section 176(a), cited above.

(d) Summary of Needed Information. As indicated above, we require the following information to allow a determination of the consistency of the proposed BRAC projects with the Air Pollution Control enforceable policy:

- A construction contract performance plan, including measures to minimize air pollutant emissions (see item (a), above); and
- The Army's part of a compilation of traffic and employment projections for incorporation into a conformity determination (see item (b), above).

The Army may provide the information directly to DEQ's Air Division or include it in the Final EIS. In this regard, Fort Belvoir staff and DEQ's Air Quality Division have begun direct discussions, which will continue with a meeting on May 1, 2007. Upon receipt of the requested information, the Air Division will complete its analysis of the federal consistency determination. If the information is provided in the Final EIS, DEQ's office of Environmental Impact Review will conduct the review of the FEIS and the consistency determination concurrently.

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If you need clarification about the information requested, please contact DEQ's Air Quality Division (Jim Sydnor, telephone (804) 698-4424 or Tom Ballou, telephone (804) 698-4406). For clarification on the federal consistency requirement and review process, please contact me (telephone (804) 698-4325) or Charlie Ellis of this Office (telephone (804) 698-4488).

(e) *Notification Requirement.* In accordance with the Federal Consistency Regulations, 15 CFR Part 930, section 930.43(e), the Army must notify DEQ if it decides to proceed, despite our objection, before the project commences.

Other Applicable Enforceable Policies of the VCP

Based on the information submitted and the comments of reviewing agencies, we concur that the proposed activity is consistent with the following enforceable policies of the Virginia Coastal Resources Management Program, provided that the Army and its contractors comply with all applicable requirements.

1. *Fisheries Management.* According to the Department of Game and Inland Fisheries, the proposed BRAC projects at Fort Belvoir are consistent with the Fisheries Management enforceable policy of the Virginia Coastal Resources Management Program.

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2. *Wetlands Management.* As indicated above (see "Environmental Impacts and Mitigation," item 5(b)), a Virginia Water Protection Permit will be required for projects affecting wetlands and/or surface waters. In order for the projects to be consistent with the Wetlands Management enforceable policy of the Virginia Coastal Resources Management Program, the Army must obtain and comply with the Virginia Water Protection Permits needed for the projects. See "Regulatory and Coordination Needs," item 2, below.

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3. *Subaqueous Lands Management.* The Marine Resources Commission has jurisdiction over any encroachments in, on, or over any state-owned rivers, creeks, or streams in the Commonwealth. If any of the project activities should involve any encroachment channelward of ordinary high water along natural rivers and streams, a permit may be required from the Commission. In that case, the project or projects in question would be consistent with the Subaqueous Lands Management enforceable policy of the Virginia Coastal Resources Management Program if the Army applies for, obtains, and complies with the permit. See "Regulatory and Coordination Needs," item 9, below.

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4. *Coastal Lands Management.* The Chesapeake Bay Preservation Act

(*Virginia Code* sections 10.1-2100 et seq.), as locally implemented through the Fairfax County Chesapeake Bay Preservation Ordinance, strictly controls land disturbance in environmentally sensitive lands.

(a) *Definitions and Related Requirements.*

(i) *Definitions.* Resource Protection Areas (RPAs) include the following:

- tidal wetlands;
- non-tidal wetlands connected by surface flow and contiguous to tidal wetlands or perennial water bodies;
- tidal shores; and
- areas within a 100-foot vegetated buffer adjacent to and landward of any of the above-listed features and along both sides of any water body with perennial flow.

Resource Management Areas (RMAs) are all other land areas, which are subject to the County's jurisdiction-wide performance criteria for development activities.

(ii) *Requirements.* RPAs and RMAs are subject to general performance criteria found in the Chesapeake Bay Preservation Area Designation and Management Regulations (9 VAC 10-20-10 et seq.; see 9 VAC 10-20-120). These include the following requirements:

- minimize land disturbance;
- preserve indigenous vegetation;
- minimize post-development impervious surfaces;
- satisfy stormwater management criteria consistent with the water quality protection provisions of the Virginia Stormwater Management Regulations (4 VAC 50-60); and
- for land disturbance over 2,500 square feet, comply with the requirements of the *Virginia Erosion and Sediment Control Handbook* (DCR, Third Edition, 1992).

Note that the only land-disturbing activities allowed in RPAs are those associated with:

- Construction of water wells;
- Construction of passive recreation facilities such as boardwalks, trails, and pathways; and
- Historic preservation and archaeological activities.

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In addition, the development criteria for RPAs limit land development therein (see the Chesapeake Bay Preservation Area Designation and Management Regulations at 9 VAC 10-20-130.1). Such development is allowed, subject to approval by the local government, only if:

- It is water-dependent (a development that cannot exist outside of the RPA and must be located on the shoreline due to its nature: ports, power plant intakes and outfalls, water and sewage treatment plants, marinas, beaches, and marine resources facilities; see 9 VAC 10-20-40);
- It constitutes re-development;
- It constitutes development or re-development within a designated "Intensely Developed Area;"
- It is a new use in the nature of a permitted encroachment, as defined (9 VAC 10-20-130.4.a.);
- It is a road or driveway crossing satisfying certain conditions (no reasonable alternatives, *etc.*; see 9 VAC 10-20-130.1.d.);
- It is a flood control or stormwater management facility meeting certain conditions (minimum necessary size, approved stormwater program, *etc.*; see 9 VAC 10-20-130.1.e.).

(b) *Analysis.* The Draft EIS indicates that Fort Belvoir has approximately 1,984 acres of RPAs (page 4-223, section 4.7.1.5.1). It also indicates that approximately 14 acres of RPAs would be affected, in that seven proposed projects that are part of BRAC development would encroach into RPAs. The Draft EIS indicates that roads may be constructed in RPAs if certain conditions are met (page 4-231, section 4.7.2.3.2, Table 4.7-10). The federal consistency determination indicates that the encroachments would be limited to roads and utility corridors (Draft EIS, Appendix C, page C-9, "Coastal Lands Management" heading in chart).

The Draft EIS also indicates that riparian areas indicated on the water resources map (Figure 4.7-1, page 4-205) represent areas within 35 feet of intermittent or perennial streams, *inter alia* (page 4-223, section 4.7.1.5.1). Under the Regulations, Resource Protection Areas include perennial streams and a buffer of at least 100 feet, not 35 feet, landward of same (see item 4(a)(i) above and 9 VAC 10-20-80.B in the Regulations.)

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(c) *Chesapeake Ecosystem Unified Plan*. The 1998 Federal Agencies' Chesapeake Ecosystem Unified Plan requires the signatories, including the Department of Defense/Army, to fully cooperate with local and state governments in carrying out voluntary and mandatory actions to comply with the management of stormwater. In that *Plan*, the agencies also committed to encouraging construction design that:

- minimizes natural area loss on new and rehabilitated federal facilities;
- adopts low-impact development and best management technologies for storm water, sediment and erosion control, and reduces impervious surfaces; and
- considers the *Conservation Landscaping and Bay-Scapes Guide for Federal Land Managers*.

The general performance criteria exempt silvicultural activities in Chesapeake Bay Preservation Areas, provided that silvicultural operations adhere to water quality protection procedures prescribed by the Virginia Department of Forestry in its *Forestry Best Management Practices for Water Quality in Virginia Technical Guide* (1997) (see the Regulations at 9 VAC 10-20-120.10). The *Technical Guide* specifically recommends:

... all Streamside Management Zones (SMZs) be a minimum of 50 feet in width, measured from the top of the stream bank. This 50-foot SMZ is a managed forest; within this managed area up to 50% of the basal area or up to 50% of the forest canopy can be harvested.

(d) *Chesapeake 2000 Agreement*. The *Chesapeake 2000 Agreement* committed the government agency signatories to a number of sound land use and stormwater quality controls. The signatories additionally committed their agencies to lead by example with respect to controlling nutrient, sediment and chemical contaminant runoff from government properties. In December 2001, the Executive Council of the Chesapeake Bay Program issued *Directive No. 01-1, Managing Storm Water on State, Federal and District-owned Lands and Facilities*, which includes specific commitments for agencies to lead by example with respect to stormwater control.

(e) *Conclusion on Coastal Lands Management Consistency*. Provided that the BRAC projects at Fort Belvoir are in compliance with the following three requirements as well as the foregoing recommendations and requirements, the Division of Chesapeake Bay Local Assistance concurs that the projects are consistent with the Coastal Lands Management enforceable policy of the Virginia Coastal Resources Management Program. The requirements are:

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- Part IV, Land Use and Development Performance Criteria, Chesapeake Bay Preservation Area Designation and Management Regulations, 9 VAC 10-20-110 et seq.;
- Stormwater management criteria consistent with water quality protection provisions (4 VAC 50-60-60 et seq.) of the Virginia Stormwater Management Regulations (4 VAC 50-60 et seq.); and
- *Virginia Erosion and Sediment Control Handbook* (Third Edition, 1992).

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5. Non-point Source Pollution Control. The Erosion and Sediment Control Plan requirement applies to projects involving land disturbance of 2,500 square feet or more in Chesapeake Bay Preservation Areas. The following activities are subject to the Plan requirement:

- clearing and grading activities
- installation of staging areas, parking lots, roads, buildings, utilities, or other structures
- soil/dredge spoil areas, and
- related land conversion activities.

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Questions may be directed to the appropriate Watershed Office of the Department of Conservation and Recreation. See "Regulatory and Coordination Needs," item 4, below.

Plan development, approval, and compliance would make the project consistent with the Non-point Source Pollution Control enforceable policy of the Virginia Coastal Resources Management Program.

6. Point Source Pollution Control. DEQ's Northern Virginia Regional Office recommends that the Army ensure that capacity for anticipated sanitary wastes is available at Fairfax County's Noman Cole Wastewater Reclamation Plant (WWRP). New sanitary sewer lines and pump stations are subject to review and approval by DEQ prior to construction. The Army must obtain and comply with Virginia Pollutant Discharge Elimination System (VPDES) permits for such facilities in order to make them consistent with the Point Source Pollution Control enforceable policy of the Virginia Coastal Resources Management Program. See "Regulatory and Coordination Needs," item 2, below.

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Regulatory and Coordination Needs

1. Air Quality Regulation.

(a) *Regulatory Requirements for Construction.* As stated above ("Environmental Impacts and Mitigation," item 3(b)(iv)), the construction projects should be accomplished in full compliance with current and pending Virginia regulatory requirements, through the use of compliant practices and/or products. These requirements appear in 9 VAC 5, Chapter 40 (existing stationary sources), Part II (emission standards) of the Virginia Regulations for the Control and Abatement of Air Pollution. They are:

Article 1, Visible emissions and fugitive dust and emissions (9 VAC 5-40-60 et seq.);

Article 39, Asphalt paving operations (9 VAC 5-40-5490 et seq.);

Article 40, Open burning (9 VAC 5-40-5600 et seq.);

Article 42, Portable fuel containers (9 VAC 5-40-5700 et seq.);

Article 49, Architectural and industrial maintenance coatings (9 VAC 5-40-7120 et seq.); and

Article 50, Consumer products (9 VAC 5-40-7240 et seq.).

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The portable fuel container and consumer products rules (Articles 42 and 50) are being revised, and more restrictive requirements will be in effect no later than 2009. This listing is not all-inclusive; the Army and any contractors should ensure compliance with all applicable Virginia air pollution control regulations.

Irrespective of whether stationary sources are above or below the major source threshold, one or more air pollution control permits will be required for the projects.

(b) *Coordination.* Once the final project plan is selected, the Army should submit applications to DEQ's Northern Virginia Regional Office. Questions regarding air quality compliance and permit applicability may be directed to that Office (Mr. Terry Darton, Air Permit Manager, telephone (703) 583-3845).

2. *Water Quality Regulation.* As indicated above ("Environmental Impacts and Mitigation," item 5(b)), Virginia Water Protection Permits will be required for project impacts to surface waters. Wetland impacts will also require these permits. The Army should contact DEQ's Northern Virginia Regional Office (Tom Faha, Water Permits Manager, telephone (703) 583-3846) to pursue appropriate permits governing surface water and wetland impacts.

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3. *Wildlife Protection.* The Army is requested to coordinate with the Department of Game and Inland Fisheries (start with Amy Martin, telephone (804) 367-2211) regarding the siting of the MWR ("Morale, Welfare, and Recreation") Family Travel Camp project, because of its proximity to potential bald eagle nesting areas and to important hunting areas (see "Environmental Impacts and Mitigation," item 2(c), above). In addition, the Army is requested to coordinate with the Department relative to the following issues discussed above ("Environmental Impacts and Mitigation," items 1 and 2, sub-paragraphs indicated):

- Managing wildlife through hunting activity (item 2(e))
- Effects of projects on anadromous fish waters (item 2(f)(ii));
- Effects of projects on bald eagles and nests (item 2(g)(i)). For projects which may affect bald eagles, the Army must also coordinate with the U.S. Fish and Wildlife Service (Eric Davis, Virginia Field Office, telephone (804) 693-6694, extension 104).
- Effects of projects on wood turtles (items 1(c) and 2(g)(ii));
- Effects of projects on shortnose sturgeon habitat (item 2(g)(v));
- Planning for, and effects of, the proposed MWR Family Travel Camp (item 2(c), on bald eagle habitat in particular (item 2(g)(i); and
- Effects of projects on wildlife habitat in general.

In addition, the Army is requested to coordinate with the Department of Game and Inland Fisheries and the U.S. Fish and Wildlife Service (see contact information above) with regard to avoiding the habitat of the small whorled pogonia (see "Environmental Impacts and Mitigation," item 1(b)(i), above).

4. *Erosion and Sediment Control; Stormwater Management.* Erosion and Sediment Control requirements stem from the Virginia Erosion and Sediment Control Law, *Virginia Code* section 10.1-567; Stormwater Management Plan requirements stem from the Virginia Stormwater Management Law, *Virginia Code* section 10.1-603.15. The Army must comply with these rules governing erosion and sediment control and stormwater management; as mentioned above, the erosion and sediment control requirement is an enforceable policy of the Virginia Coastal Resources Management Program ("Federal Consistency," item 7). The Army is encouraged to contact the Department of Conservation and Recreation's Potomac Watershed Office (Gary Switzer, telephone (540) 347-6420 for erosion and sediment control, and Shelby Hertzler, telephone (540) 351-1589 for stormwater management) and/or local erosion and sediment control and stormwater management officials to obtain assistance in plan development and implementation, and to ensure that controls are in compliance with applicable requirements during and after construction of the project.

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The Department of Conservation and Recreation publishes the *Virginia Erosion and Sediment Control Handbook* and the *Virginia Stormwater Management Handbook*. See the Department's web site at <http://www.dcr.virginia.gov/soil & water> for additional information.

5. *VPDES Stormwater Management General Permit*. As mentioned above ("Environmental Impacts and Mitigation," item 7(c)), the VPDES Stormwater General Permit is required for land disturbances of 2,500 square feet or more but less than one (1) acre in Chesapeake Bay Preservation Areas. General information and registration forms for this general permit are available on the Department of Conservation and Recreation's web site: <http://www.dcr.virginia.gov/soil & water/vsmp/shtml>. The Army may direct specific questions on this requirement to the Department of Conservation and Recreation's Division of Soil and Water Conservation (Holly Sepety, telephone (804) 225-2613).

6. *Solid and Hazardous Waste Management*.

(a) *Contamination*. Any soil suspected of contamination, or wastes that are generated, must be tested and disposed of in accordance with applicable federal, state, and local laws and regulations. These include, but are not limited to, the Virginia Waste Management Act (*Virginia Code* sections 10.1-1400 et seq.), the Virginia Hazardous Waste Management Regulations (9 VAC 20-60), and the Virginia Solid Waste Management Regulations (9 VAC 20-80). (See the enclosed DEQ memo, Kohler to Ellis, dated March 27, 2007 for additional citations.) Sampling in accordance with the Hazardous Waste Management Regulations may need to be done on unknown material, such as in the Engineering Proving Grounds (EPG). The Army should also continue using appropriate EPA identification numbers for each specific parcel (i.e., EPG, GSA Parcel, or main base) for tracking hazardous waste.

(b) *CERCLA Responsibilities*. DEQ's Waste Division, Federal Facilities Restoration Program recommends that the Army contact Fort Belvoir's Environmental and Natural Resources Division (Ms. Laura Curtis, telephone (703) 806-0024) for information concerning CERCLA obligations at the Main Post and EPG. This contact is also recommended as pre-requisite to any disturbance of land, sediment, or groundwater at or near Military Munitions Restoration Program sites, Solid Waste Management Units at the Main Post or EPG, or Areas of Potential Concern at EPG (see the discussion of the Historical Records Review, "Environmental Impacts and Mitigation," item 4(c), above).

S2.53

(c) *Solid Waste Permitting.* The Army should contact DEQ's Northern Virginia Regional Office (Richard Doucette, telephone (703) 583-3813) for questions relating to any of the four solid waste management facilities with solid waste permits in hand or in process (see "Environmental Impacts and Mitigation," item 4(d), above). Similarly, for any new solid waste management facilities, the Army should contact the Regional Office, above.

Note that if the material is a solid waste, the waste generator, in this case the Army, has the responsibility for determining whether the waste is hazardous. This can be accomplished by applying the knowledge of the generator of the material, such as using information from the label of a container, or by sampling the material in accordance with the Virginia Hazardous Waste Management Regulations (see item 6(a), above).

(d) *Demolition or Renovation of Structures.* Any structures to be demolished, renovated, or removed should be checked beforehand for asbestos-containing materials and lead-based paint. If asbestos-containing materials are found, the Army must follow the requirements of 9 VAC 20-80-640 as well as other requirements in the Solid Waste Management Regulations cited above (item 6(a)). Similarly, if lead-based paints are found, the Army must follow the requirements of 9 VAC 20-60-261 as well as other requirements in the Hazardous Waste Management Regulations.

Additional information on asbestos may be obtained from the Department of Labor and Industry (Ronald Graham, telephone (804) 371-0444). Additional information on lead-based paint may be obtained from the Department of Professional and Occupational Regulation (David Dick, telephone (804) 367-8595).

7. *Historic Resources Coordination.* To ensure compliance with section 106 of the National Historic Preservation Act, the Army is requested to contact the Department of Historic Resources (Marc Holma, telephone (804) 367-2323, extension 114), with regard to the archaeological potential of the GSA Parcel and the evaluation report and recommendation stemming from the Phase II evaluation of Site 44FX 1933 (see "Environmental Impacts and Mitigation," item 6(e), above). The Phase II evaluation report and recommendation should be submitted in two copies to:

Mr. Marc Holma
Department of Historic Resources
2801 Kensington Avenue
Richmond, Virginia 23221.

52.54

The submissions and consultation should refer to DHR file number 2006-0820.

8. *Roads and Transportation.* Any VDOT land use requirements, lane closures, traffic control, or work zone safety issues should be closely coordinated with Fairfax County (start with the Department of Planning and Zoning, Noel Kaplan, telephone (703) 324-1210) and with VDOT's Northern Virginia District Office (telephone (703) 383-2888).

52.55

9. *Subaqueous Lands Encroachment.* As mentioned above ("Federal Consistency..." item 3), a permit may be required from the Marine Resources Commission for any project encroachment channelward of ordinary high water along natural rivers and streams. Inquiries regarding Marine Resources Commission permitting applicability and procedures may be directed to the Commission (Elizabeth Gallup, telephone (757) 247-2200).

52.56

10. *Recreation.* Questions regarding the recommendations on recreation facilities ("Environmental Impacts and Mitigation," item 8, above) may be directed to the Department of Conservation and Recreation (Robert Munson, telephone (804) 786-6140). The Family Travel Camp proposal should also be discussed with the Department of Game and Inland Fisheries (see "Regulatory and Coordination Needs," item 3, above) because of the proximity of the site to potential wildlife habitat.

52.57

11. *Water Supply and Wastewater Coordination.*

(a) *Water Supply.* Inasmuch as potable water is to be purchased from the Fairfax County Water Authority, the Army should consult with the County (start with the Department of Planning and Zoning, attn: Noel Kaplan, telephone (703) 324-1210) regarding any additional water supply needs; the existing purchase contract may need to be revised. Water supply facilities must also be in compliance with Virginia's Waterworks Regulations (12 VAC 5-590-10 *et seq.*). Information on development of water supply facilities is available from the Department of Health's Culpeper Field Office (Hugh Eggborn, Director, telephone (540) 829-7340).

52.58

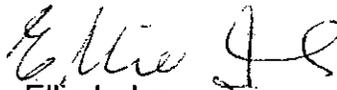
(b) *Wastewater.* Expansion of wastewater facilities would need to comply with Virginia's Sewage Collection and Treatment Regulations (9 VAC 25-790 *et seq.*). Information on compliance with these regulations is available from DEQ's Northern Virginia Regional Office (Tom Faha, Water Permits Manager, telephone (703) 583-3846). The Army should also check with the County (contact information above) regarding the capacity of the existing facility to take additional wastewater.

12. *Local Coordination.* DEQ recommends that the Army consult fully with Fairfax County in particular (start with the Department of Planning and Zoning, attn: Noel Kaplan, telephone (703) 324-1210) regarding planning for and implementing the BRAC projects.

52.59

Thank you for the opportunity to review this Draft EIS. Detailed comments of reviewers are attached. We look forward to reviewing the Final EIS. If you have questions about these comments, please feel free to call me (telephone (804) 698-4325) or Charles Ellis of this Office (telephone (804) 698-4488).

Sincerely,



Ellie L. Irons
Program Manager
Office of Environmental Impact Review

Enclosures

cc: Amy F. Martin, DGIF
Robert S. Munson, DCR
Susan E. Douglas, VDH
Paul W. Kohler, DEQ-Waste
Durwood H. Willis, DEQ-Waste-FFR
Wade Smith, DEQ-Waste-FFR
Kotur S. Narasimhan, DEQ-Air-OADAP
Thomas Ballou, DEQ-Air-OADAP
Joseph P. Hassell, DEQ-DWR
Thomas A. Faha, DEQ-NVRO
Mary T. Stanley, VDOT
Elizabeth Gallup, MRC
Marc E. Holma, DHR
Matthew Heller, DMME
Todd A. Groh, DOF
Alice R. T. Baird, DCR-DCBLA
G. Mark Gibb, NVRC
Noel F. Kaplan, Fairfax County
Anthony H. Griffin, Fairfax County
Susan E. Holtham, ACOE, New England
Patrick M. McLaughlin, Fort Belvoir
✓ Patrick Solomon, Tetra Tech, Inc.

Colonel Brian W. Lauritzen
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David M. Kennedy, NOAA-NOS-OCRM
David W. Kaiser, NOAA-NOS-OCRM

Ellis, Charles

From: Martin, Amy (DGIF)
Sent: Friday, March 30, 2007 2:23 PM
To: Ellis, Charles
Cc: Jeff Cooper; Jerry Sims; John Kauffman; John Kleopfer; John Rohm; Phil Parrish; Steve Owens
Subject: ESSLog# 22536_Ft. Belvoir BRAC_JPA#07-032F

We have reviewed the Draft Environmental Impact Statement (DEIS) for the Implementation of BRAC Recommendations and Related Army Actions at Ft. Belvoir. We offer the following comments and recommendations. The Department of Game and Inland Fisheries (VDGIF), as the Commonwealth's wildlife and freshwater fish management agency, exercises enforcement and regulatory jurisdiction over those resources, inclusive of state or federal endangered or threatened species, but excluding listed insects.

We are a consulting agency under the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), and we provide environmental analysis of projects or permit applications coordinated through the Virginia Department of Environmental Quality, the Virginia Marine Resources Commission, the U.S. Army Corps of Engineers, and other state or federal agencies. Our role in these procedures is to determine likely impacts upon fish and wildlife resources and habitats, and to recommend appropriate measures to avoid, reduce, or compensate for those impacts.

The DEIS evaluates two proposals: update of the land use plan of the post's real property master plan and implementation of the base realignment. The purpose of the land use plan update is to obtain a revised plan addressing allocation of functions and facilities at the post. The base realignment is necessary to realign functions as directed by the BRAC Commission's recommendations for Ft. Belvoir.

2.0 Proposed Action

2.2.1 Land Use Plan Update:

We have concerns related to the inclusion of areas on Ft. Belvoir that were previously designated as "Outdoor Recreation" and "Environmentally Sensitive" being incorporated into designations such as "Community", "Airfield", and "Professional/Institutional" as these areas may be used for development. It states in the DEIS that the newly designated areas could be used for activities not requiring construction and that the environmentally sensitive areas will continue to retain regulatory protections. However, we are concerned that as the post grows, these areas previously designated for open space may be subject to development pressure. The more open space there is the more wildlife habitat is available and the greater the protection for the watershed. Further, the designation of areas on the post as open space and/or natural resource protection areas may, if protected and situated properly within the landscape, provide corridors for wildlife movement and linkages between habitats. We recommend that such areas include the environmentally sensitive areas, wetlands, and riparian buffers consistent with RPAs and as recommend below for the protection of sensitive wildlife resources. Further, we question whether or not the change in designation of these areas is consistent with the Integrated Natural Resource Management Plan (INRMP) developed for Ft. Belvoir. We also question whether or not, in accordance with the Sikes Act, the state wildlife agency (DGIF) and the USFWS should have been consulted on proposed changes to the Land Use Plan that may change the designation of areas known to provide wildlife habitat, particularly that of threatened and endangered species.

2.2.2 Base Realignment

We question the use of the conceptual development strategy to instigate and reform the Land Use Plan. It seems that the Land Use Plan should inform the development plans on the post. We question the statement on page 2-12 (2.2.2.3) that the construction planned at Ft. Belvoir will result in "6.2 square feet of additional built space". It does not appear that this figure agrees with the proposed development which seems to include the construction of a number of buildings (table 2-3) of substantial square footage. We support the statement on page 2-17 that describes the consideration of environmental and cultural resources in siting facilities. We support, as described in this statement, the avoidance of loss of natural resources "such as wetlands, listed or sensitive species or their habitat, [and] wildlife species' travel corridors...".

2.2.2.3 Construction and Renovation

We note that each of the alternatives includes a project (#20) called MWR Family Travel Camp. This project appears to include areas for 52 recreational vehicles campsites, a camp support facility, 15 cabins and 12 tent sites. On the maps, it appears this camp is proposed to be constructed on the southwest part of the South Post. This project, therefore, may have the potential to impact waterfowl hunting Zone 2 and/or areas that are hunted for deer and turkey. We recommend that this project be coordinated with our regional wildlife biologists to ensure that impacts upon important hunting areas be minimized or avoided. In addition, this area may impact bald eagle nesting and/or concentration areas. We recommend that this proposed camp site be further reviewed by our agency so that we may address any impacts upon rare wildlife and/or hunting opportunities in the area.

3.0 Alternatives

3.3 Alternative Land Use Plans

Three alternatives (Town Center, City Center, and Satellite Campuses) and the preferred alternative (a combination of the previously mentioned three alternatives) are addressed in this section. We would have preferred, if provided the opportunity to comment, that the Town Center Alternative be adopted as the preferred Land Use Plan. This alternative appears to cluster most of the proposed development to areas already highly developed therefore avoiding most of the wildlife habitat and environmentally sensitive areas. However, even this alternative groups the lands into the more restrictive categories as described above.

4.0 Affected Environment and Environmental Consequences

4.2.2.1 Land Use Plan Update

As mentioned before, we are concerned about the inclusion of areas previously designated as "Environmentally Sensitive" and "Outdoor Recreation" into the more restricted categories for the reasons mentioned above. We also note that this Plan allows for the "orderly development of EPG". Although we understand the need for the development at EPG, we note that this area includes the Accotink drainage which provides wildlife habitat that should be protected. This preferred alternative plan "increases the post's available acreage for development by approximately 800 acres". We question whether it was necessary to increase the amount of area designated for development through an update of the plan. It seems that the existing plan, retaining the sensitive and outdoor space designations, included areas designated for future development.

4.2.2.2 BRAC Implementation and Facilities Projects (Environmental Consequences of the Preferred Alternative) We note that on page 4-19, the DEIS states that due to new construction, renovation and existing construction, Ft. Belvoir would grow from "nearly 11 million square feet to approximately 16 million square feet" with an additional 7 million square feet for parking. This contradicts the statement (a typo?) made on page 2-12 that there will be 6.2 square feet of new space.

4.7.1.5.1 Coastal Zone Management Act and Chesapeake Bay Initiatives (also section 4.7.2.3.2) We recommend adherence to all Chesapeake Bay Act requirements including protection of riparian areas, protection of the RPAs on the site and protection of wetlands and tidal waters.

4.7.2.4.1 Surface Water Quality BMPs

We do not support the use of in-line BMPs. We support the use of stormwater, erosion and sedimentation controls during construction. We recommend that the stormwater controls for any project be designed to replicate and maintain the hydrographic condition of the site prior to the change in landscape. This should include, but not be limited to, utilizing bioretention areas, and minimizing the use of curb and gutter in favor of grassed swales. Bioretention areas (also called rain gardens) and grass swales are components of Low Impact Development (LID). They are designed to capture stormwater runoff as close to the source as possible and allow it to slowly infiltrate into the surrounding soil. They benefit natural resources by filtering pollutants and decreasing downstream runoff volumes. We note that in this section of the DEIS, LID practices are mentioned and we encourage their use. We recommend conducting any in-stream activities during low or no-flow conditions, using non-erodible cofferdams to isolate the construction area, blocking no more than 50% of the streamflow at any given time, stockpiling excavated material in a manner that prevents reentry into the stream, restoring original streambed and streambank contours, revegetating barren areas with native vegetation, and implementing strict erosion and sediment control measures. Due to future maintenance costs associated with culverts, and the loss of riparian and aquatic

habitat, we prefer stream crossings to be constructed via clear-span bridges. However, if this is not possible, we recommend countersinking any culverts below the streambed at least 6 inches, or the use of bottomless culverts, to allow passage of aquatic organisms. We also recommend the installation of floodplain culverts to carry bankfull discharges.

4.8 Biological Resources

We agree that Ft. Belvoir supports some ecologically sensitive and unique areas. We recommend review of the INRMP to ensure that the activities proposed for Ft. Belvoir are consistent with previously agreed upon management activities for the wildlife and habitat available on the post.

4.8.1.4 Animals

We agree that Ft. Belvoir includes habitat that supports a number of mammal species, birds, reptiles and amphibians. We recommend that open space on the post be maintained to continue to provide habitat for these species. In particular, providing stop-over or resting habitat for migrants in this area of Virginia is very important. In general, we recommend maintaining wooded lots, minimizing impacts upon forests, streams and wetlands to the greatest extent possible and maintaining riparian buffers. We recommend adherence to the management practices agreed upon in the INRMP for Ft. Belvoir. We recommend coordination with our regional wildlife biologists to continue to manage wildlife populations through hunting activities. We recommend continued survey activities throughout the post to determine what species exist on site, what habitats they are using and to monitor any changes in these populations as Ft. Belvoir BRAC activities proceed.

Accotink Creek, Dogue Creek, Pohick Creek and the Potomac River have been designated Anadromous Fish Use Areas. We recommend that any projects proposing impacts upon these waters be coordinated with our agency so that we may address impacts upon these important fishery resources. We may recommend time of year restrictions or activity restrictions for the protection of these areas. It is important that these waters remain free of impediments and that the water quality be maintained. Anadromous fishes are particularly sensitive to sedimentation and noise (percussion, vibration) and activities that create these stressors may result in impacts upon these resources and the ability of these fishes to migrate through and spawn in these waters.

4.8.1.5 Rare, Threatened, and Endangered Species

Listed species of particular concern to our agency that occur on site are the federally threatened state threatened bald eagle and the state threatened wood turtle. Bald eagle nests are known from the Southwest Area and the South Post of Ft. Belvoir. In addition to these nests, much of the shoreline along the Potomac River, including the shores along Accotink Bay and Pohick Bay are designated Concentration Zones for this species. We recommend that any projects in these areas be evaluated by our agency and the USFWS for possible impacts upon this species. According to the "Bald Eagle Protection Guidelines for Virginia" (available at www.dgif.virginia.gov), any projects within 1,320 ft (0.25 mile) of a bald eagle nest may result in impacts upon this species. Projects located within the protection zone may be subject to time of year restrictions, activity restrictions, or other conservation measures. The concentration zone is also afforded some protection.

According to the guidelines, any activity within 750 ft of the shoreline may result in impacts upon bald eagle. Any projects proposed in the protection zone may be subject to the same type of restrictions as described above. We note that project #20, the family travel camp, is proposed for areas that may include bald eagle concentration (foraging) and nesting area and may result in impacts upon this species.

Wood turtles are known from Ft. Belvoir as well. This species utilizes clear brooks and streams during hibernation periods, but also wander in riparian areas for foraging and nesting during warmer months. They have been documented on the North Post. Dogue Creek and an unnamed tributary to Dogue Creek have been designated Threatened and Endangered Species Waters due to the presence of this species. They are also known from the Accotink drainage although none have been documented from this stream on Ft. Belvoir. We recommend that any projects proposed to impact these waters and/or riparian areas within 600 ft of these waters be coordinated with this agency. For the protection of this species, we may recommend that any project to impact such areas adhere to time of year restrictions for certain activities, education of contractors, survey activities, or other conservation recommendations. We recommend that all streams and wetlands retain at least 100-foot riparian buffers and that streams known to support wood turtle retain buffers of up to 600 feet.

We do agree that state threatened peregrine falcon may occur at Ft. Belvoir, but we do not currently document any nesting sites on the post. Therefore, we do not anticipate that BRAC actions will result in impacts upon this species.

The northern Virginia well amphipod has been documented on the South Post. Threats to this species include degradation of ground waters. We recommend consideration of this species and its habitats as BRAC actions proceed.

The recommendations mentioned above for anadromous fishes also apply with regard to the protection of the federally endangered state endangered shortnose sturgeon which is known from the Potomac River. We recommend adherence to those recommendations and coordination with our office and the USFWS regarding potential impacts upon this species.

4.8.2.1.1 Land Use Plan Update

We note that in this section the DEIS states that "areas previously designated as Environmentally Sensitive or Outdoor Recreation could potentially be used for purposes incompatible with natural resource management goals". As previously stated, we are concerned that the new Land Use Plan will open these previously protected areas up for development. We recommend further consideration on this matter.

4.8.2.1.2 BRAC Implementation and Facilities Projects

We agree with the statement made in this section that many areas currently in vegetation, and therefore providing wildlife habitat, will be converted into developed areas. We recommend mitigation for loss of habitat through preservation of like areas on site. We also agree that the development of these areas will result in lost habitat connectivity and will likely increase the occurrence of invasive vegetation and, in some instances, invasive wildlife species. We recommend the development of an invasive species control and/or management strategy to address these issues.

4.8.2.5 BMPs/Mitigation

We support the concept that no development should occur within Sensitive Natural Areas. We support adherence to the management policies as spelled out in the INRMP. We recommend mitigation for wildlife habitat loss and would be happy to assist with that effort. We support limiting development during certain times of year, not just bird nesting seasons, to minimize impacts upon wildlife. We support the use of LID. We support the designation of bald eagle nest protection zones as well as the designation of the concentration zone along the Potomac River. These areas should be protected from development. We further recommend the designation of wood turtle habitat and the protection of those areas from construction.

Appendix C: CZMA Consistency Determination

It appears that the BRAC activities on Ft. Belvoir are consistent with the Fisheries Section of the Coastal Zone Management Act.

Thank you for the opportunity to Review the DEIS. Please contact me if I can be of further assistance.

Amy Martin
Environmental Services Biologist
Wildlife Diversity Division, VDGIF
4010 W. Broad Street
Richmond, VA 23230
phone: 804-367-2211
fax: 804-367-2427
amy.martin@dgif.virginia.gov



L. Preston Bryant, Jr.
Secretary of Natural Resources

Joseph H. Maroon
Director

COMMONWEALTH of VIRGINIA
DEPARTMENT OF CONSERVATION AND RECREATION

203 Governor Street
Richmond, Virginia 23219-2010
(804) 786-6124

MEMORANDUM

DATE: March 27, 2007
TO: Charlie Ellis, DEQ
FROM: Robert S. Munson, Planning Bureau Manager, DCR-DPR *Robert S. Munson*
SUBJECT: DEQ 07-032F; DOD/US Army/Fort Belvoir – Implementation of 2005 BRAC, Fairfax County

The Department of Conservation and Recreation (DCR), Division of Planning and Recreation (DPR), is responsible for developing the Virginia Outdoors Plan (VOP), the state's comprehensive outdoor recreation and open space plan. As such DCR-DPR reviews projects for consistency with known recreational needs of all Virginian's. DCR found the Environmental Impact Statement document (EIR) was comprehensive with the exception of defining the recreational needs of the additional people assigned to the base; therefore, we recommend that the recreational aspect of the Fort Belvoir realignment be addressed more fully.

Fort Belvoir must provide adequate recreational facilities to meet the needs of all personnel assigned to the Base. Fairfax County's responsibility to provide recreational resources, does not extend to government facilities. In an effort to address these needs DCR offers the following recommendations and comments:

- Create recreational section heading under 1.4.3 that outlines all indoor and outdoor recreation needs. Provide a plan for how the realigned base would provide for the recreational needs of 22,000 people and their families is also recommended.
- Evaluate the on-base alternatives to vehicular travel by assessing pedestrian trails for walking and cycling. Evaluate potential passive recreation trails in the environmental corridors discussed in the EIR.
- While the document mentions trail systems and open spaces there is no mention of gyms, pools, activity centers and ball fields. DCR has found that these features contribute greatly to the quality of life in all communities and we recommend that they be added into the design of the newly realigned Base.
- Develop a plan for alternative transportation (walking and biking) to connect all developed portions of the base.

- We support the full development and all upgrades for the MWR Family Travel Camp.

Further, DCR's Division of Natural Heritage has searched its Biotics Data System for occurrences of natural heritage resources from the area outlined on the submitted map. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.

The following general comments are for the early planning stages of the BRAC Action. Please send more specific plans for development when they are available. DCR can then provide more detailed recommendations.

According to the information in our files, the several conservation sites are located within the project area. Conservation sites are tools for representing key areas of the landscape that warrant further review for possible conservation action because of the natural heritage resources and habitat they support. Polygons are built around one or more rare plant, animal, or natural community and are designed to include the element and, where possible, its associated habitat, and buffer or other adjacent land thought necessary for the element's conservation. Conservation sites are given a biodiversity significance ranking based on the rarity, quality, and number of element occurrences they contain; on a scale of 1-5, 1 being most significant. The conservation site names and biodiversity ranks, and the natural heritage resource(s) of concern associated with the sites are listed below:

- Pohick/Accotink Wetlands Conservation Site- B3 (high significance)
 - coastal plain/piedmont acidic seepage swamp
 - mesic mixed hardwood forest
 - tidal freshwater marsh
 - sphagnum sprite (*Nehalennia gracilis*, G5/S1S2/NL/NL)
 - vetchling (*Lathyrus palustris*, G5/S1/NL/NL)
 - a sedge (*Carex vestita*, G5/S2/NL/NL)
 - river bulrush (*Schoenopletus Fluvialtilis*, G5/S2/NL/NL)
 - water-plaintain spearwort (*Ranunculus ambigens*, G4/S1/NL/NL)
- Huntley Meadows- B5 (general significance)
 - Purple milkweed (*Asclepias purpurascens*, G5/S2/NL/NL)
- Meadow-Thompson Creek Conservation Site- B3 (high significance)
 - mesic mixed hardwood forest
- Area T-17 Ravines Conservation Site- B3 (high significance)
 - Northern Virginia well amphipod (*Stygobromus phreaticus*, G2G3/S1/SOC/NL)
- Dogue Creek Conservation Site- B5 (general significance)
 - Wood turtle (*Glyptemys insculpta*, G4/S2/NL/LT)

Additionally, the wood turtle has also been documented at the Po Road Bridge, and Accotink Creek. Please note that the wood turtle is currently classified as threatened by the Virginia Department of Game and Inland Fisheries (VDGIF). Due to the protected status of the wood turtle, DCR recommends coordination with VDGIF to ensure compliance with protected species legislation. To minimize adverse impacts to the aquatic ecosystem as a result of the proposed activities, DCR also recommends the

implementation of and strict adherence to erosion and sediment control measures during all land disturbing activities.

Small whorled pogonia (*Isotria medeoloides*, G2/S2/LT/LE) has also been recently documented at Fort Belvoir. Please note that small whorled pogonia is currently classified as threatened by the United States Fish and Wildlife Service (USFWS) and as endangered by the Virginia Department of Agriculture and Consumer Services (VDACS). Due to the protected status of small whorled pogonia, DCR recommends coordination with USFWS and VDGIF to ensure compliance with protected species legislation. DCR also recommends the avoidance of this species. Parker's pipewort (*Eriocaulon parkeri*, G3/S2/N1/NL) and river bulrush (*Schoenopletus Fluviatilis*, G5/S2/NL/NL) have also been documented within Fort Belvoir.

DCR recommends the avoidance of the significant natural communities listed above (see Technical Report for the U.S Army Fort Belvoir 96-03, 1996). Also the wetlands in the Southwest training area should be avoided, especially the beaver pond. Training in these wetlands could cause significant impacts to the hydrology of the wetlands and impact the sphagnum sprite found there. The seepage swamp habitat should be maintained. Avoiding wetland impacts will also protect the viability of the rare wetland plants mentioned above. Additionally, Training Area T-17 should be avoided due to possible significant impacts to the Northern Virginia well amphipod. This is the only known extant population globally for this species.

VDACS, which has regulatory authority to conserve rare and endangered plant and insect species through the Virginia Endangered Plant and Insect Species Act, has established a Memorandum of Agreement with the Virginia Department of Conservation and Recreation (DCR). Under this Agreement DCR's Division of Natural Heritage, in consultation with VDACS, represents VDACS in its comments and recommendations regarding the potential impact of reviewed projects or activities on state-listed plant and insect species. Since it has been determined that this project or activity may impact small whorled pogonia a state-protected plant, VDACS will respond directly to ensure compliance with Virginia's Endangered Plant and Insect Species Act. Further correspondence regarding the potential impacts of this project or activity on state-listed plant and insect species should be directed to VDACS.

Our files do not indicate the presence of any State Natural Area Preserves under DCR's jurisdiction in the project vicinity.

Any absence of data may indicate that the project area has not been surveyed, rather than confirm that the area lacks natural heritage resources. New and updated information is continually added to Biotics. Please contact DCR for an update on this natural heritage information if a significant amount of time passes before it is utilized.

The Virginia Department of Game and Inland Fisheries maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters, which may contain information not documented in this letter. Their database may be accessed from http://www.dgif.virginia.gov/wildlife/info_map/index.html, or contact Shirl Dressler at (804) 367-6913.

In addition, the Chesapeake Bay Preservation Act, as locally implemented through the Fairfax County Chesapeake Bay Preservation Ordinance, strictly controls land disturbance in environmentally sensitive lands. These lands, referred to as Resource Protection Areas (RPAs), include tidal wetlands, non-tidal wetlands connected by surface flow and contiguous to tidal wetlands or perennial water bodies, tidal shores and those areas within a 100-foot vegetated buffer located adjacent to and landward of the any of the above-referenced features and along both sides of any waterbody with perennial flow. All other land areas, known as Resource Management Areas (RMAs), are subject to the County's jurisdiction-wide

Public roads and their appurtenant structures are conditionally exempt from the *Chesapeake Bay Preservation Area Designation and Management Regulations* provided they are constructed in accordance with (i) regulations promulgated pursuant to the Erosion and Sediment Control Law (§ 10.1-560 et seq. of the Code of Virginia) and the Stormwater Management Act (§ 10.1-603.1 et seq. of the Code of Virginia), (ii) an erosion and sediment control plan and a stormwater management plan approved by the Virginia Department of Conservation and Recreation, or (iii) local water quality protection criteria at least as stringent as the above state requirements. The exemption of public roads is further conditioned upon the optimization of the road alignment and design, consistent with other applicable requirements, to prevent or otherwise minimize (i) encroachment in the Resource Protection Areas and (ii) adverse effects on water quality.

Provided that the Army adheres to the above requirements and recommendations, we (DCR-DCBLA), concur that the project would be consistent with the *Chesapeake Bay Preservation Area Designation and Management Regulations*.

Lastly, as mentioned above, federal agencies and their authorized agents conducting regulated land disturbing activities on private and public lands in the state must comply with the Virginia Erosion and Sediment Control Law and Regulations (VESCL&R), Virginia Stormwater Management Law and Regulations (VSWML&R), and other applicable federal nonpoint source pollution mandates (e.g. Clean Water Act-Section 313, Federal Consistency under the Coastal Zone Management Act). Clearing and grading activities, installation of staging areas, parking lots, roads, buildings, utilities, or other structures, soil/dredge spoil areas, or related land conversion activities that disturb 2,500 square feet or more would be regulated by VESCL&R and those that disturb one acre or greater would be covered by VSWML&R. Accordingly, the sponsoring federal agency should prepare and implement erosion and sediment control (ESC) and stormwater management (SWM) plans to ensure compliance with state law. The sponsoring federal agency is ultimately responsible for achieving project compliance through oversight of on site contractors, regular field inspection, prompt action against non-compliant sites, and/or other mechanisms consistent with agency policy. The agency is highly encouraged to contact DCR's Watershed Office and/or the local ESC and SWM authorities to obtain plan development, implementation assistance and to ensure project conformance during and after active construction. [Reference: VESCL §10.1-567; VSWML §10.1-603.15]

A copy of the document titled, DCR Urban Programs Contact Information, is available at http://www.dcr.virginia.gov/soil_&_water/documents/UrbanStaffContacts.pdf for directing requests for assistance to the appropriate DCR office for consideration.

Please note that effective 29 January 2005, House Bill 1177 transferred regulatory authority of the National Pollutant Discharge Elimination System (NPDES) programs related to municipal separate storm sewer systems (MS4s) and construction activities from the State Water Control Board to the Soil and Water Conservation Board and transferred oversight of these programs from the Virginia Department of Environmental Quality to the Virginia Department of Conservation and Recreation. As such, DCR is responsible for the issuance, denial, revocation, termination and enforcement of NPDES permits for the control of stormwater discharges from MS4s and land disturbing activities under the Virginia Stormwater Management Program. The Department of Environmental Quality will continue to manage the remaining NPDES program.

Therefore, for projects involving land disturbing activities equal to one (1) acre or more; or for projects larger than 2,500 square feet and less than one (1) acre located in Chesapeake Bay Preservation localities, the property owner/authorized agent is required to apply for registration coverage under the General Permit for Discharges of Stormwater From Construction Activities. General information and registration forms for the General Permit are available on DCR's website at

performance criteria for development activities. RPAs and RMAs are subject to general performance criteria found in §9 VAC 10-20-120 of the *Chesapeake Bay Preservation Area Designation and Management Regulations*, including requirements to minimize land disturbance, preserve indigenous vegetation, and minimize post-development impervious surfaces. Additionally stormwater management criteria consistent with water quality protection provisions (§4 VAC 50-60-60 et seq.) of the *Virginia Stormwater Management Regulations* (§ 4 VAC 50-60) shall be satisfied, and for land disturbance over 2,500 square feet, the project must comply with the requirements of the *Virginia Erosion & Sediment Control Handbook*, Third Edition, 1992.

Pursuant to the Coastal Zone Management Act of 1972, as amended, (section 307(c)(1) of the Act and the *Federal Consistency Regulations*, 15 CFR Part 930, sub-part C), Federal activities affecting Virginia's coastal resources or coastal uses must be consistent with the Virginia Coastal Resources Management Program (VCRMP). The 1998 *Chesapeake Ecosystem Unified Plan* requires the signatories, including the Department of the Army, to fully cooperate with local and state governments in carrying out voluntary and mandatory actions to comply with the management of stormwater. All signatory agencies also committed to encouraging construction design that a) minimizes natural area loss on new and rehabilitated federal facilities; b) adopts low impact development and best management technologies for storm water, sediment and erosion control, and reduces impervious surfaces; and c) considers the *Conservation Landscaping and BayScapes Guide for Federal Land Managers*. The Chesapeake 2000 Agreement committed the signatory agencies to a number of sound land use and stormwater quality controls. The signatories additionally committed the agencies to lead by example with respect to controlling nutrient, sediment and chemical contaminant runoff from government properties. In December 2001, the Executive Council of the Chesapeake Bay Program issued *Directive No. 01-1: Managing Storm Water on State, Federal and District-owned Lands and Facilities*, which includes specific commitments for agencies to lead by example with respect to stormwater control.

The *Draft Environmental Impact Statement* enclosed with your letter of March 1, 2007 references short- and long-term adverse effects to water resources (ES.6.6 Water Resources, page ES-10). Specifically, the above-referenced document outlines potential "increases in stormwater runoff, associated physical effects, and associated pollutants from land disturbance activities." Further, page ES-11 of the document references potential disturbances to the RPAs located at Fort Belvoir (40 acres, 14 acres and 18 acres respectively for the Satellite Campus Alternative, the Preferred Alternative and the City Center Alternative). Section 4.7.1.5.1 of the *Draft Environmental Impact Statement* references "...riparian areas shown on Figure 4. 7-1 represent areas within 35 feet of an intermittent or perennial stream...". Please note that §9 VAC 10-20-80 B 5 of the *Chesapeake Bay Preservation Area Designation and Management Regulations* mandates that Resource Protection Areas shall include "A buffer area not less than 100 feet in width located adjacent to and landward of all "water bodies with perennial flow that have an intrinsic water quality value due to the ecological and biological processes they perform or are sensitive to impacts which may cause significant degradation to the quality of state waters."

Please note that the only land disturbing activities allowed in Resource Protection areas are those associated with: (a) the construction of water wells, (b) the construction of passive recreation facilities such as boardwalks, trails and pathways; and (c) historic preservation and archeological activities.

Please also note that relative to silviculture activities undertaken in Chesapeake Bay preservation Areas, the Virginia Department of Forestry's current technical guide *Best Management Practices for Water Quality* specifically recommends that: "... all Streamside Management Zones (SMZs) be a minimum of 50 feet in width, measured from the top of the stream bank. This 50-foot SMZ is a managed forest; within this managed area up to 50 percent of the basal area or up to 50% of the forest canopy can be harvested."

[http://www.dcr.virginia.gov/soil & water/vsmp.shtml](http://www.dcr.virginia.gov/soil_water/vsmp.shtml)

Specific questions regarding requirements for the Virginia General (VSMP) Permit for Discharges of Stormwater From Construction Activities should be directed to Ms. Holly Sepety, at (804) 225-2613.

Thank you for the opportunity to comment on this project.

Ellis, Charles

From: Douglas, Susan (VDH)
Sent: Monday, April 16, 2007 7:28 AM
To: Ellis, Charles
Subject: Re: Comments on Draft EIS for Fort Belvoir BRAC projects (DEQ-07-032F)

Charlie-
I show this project in my log with a reply of 3-14-07. Here is a summary of our comments:
All potable water purchased from FCWA.
Expanded utilities must comply with WW Regs;
purchase contract may need to be revised.
All potable water purchased from FCWA.
Expanded utilities must comply with WW Regs;
purchase contract may need to be revised.
All potable water purchased from FCWA. Expanded utilities must comply with WW Regs; purchase contract may
need to be revised.
- Susan

Ellis, Charles wrote:

Susan, Mr. Gibb – I need your comments on the Fort Belvoir BRAC EIS, if you have any.

Thanks very much.

Charlie
DEQ-OEIR



MEMORANDUM

TO: Charles H. Ellis, III, Environmental Program Planner
gwk

FROM: Paul Kohler, Waste Division Environmental Review Coordinator

DATE: March 27, 2007

COPIES: Sanjay Thirunagari, Waste Division Environmental Review Manager; file

SUBJECT: Environmental Impact Report: Implementation of 2005 Base Realignment and Closure (BRAC), Fort Belvoir, Virginia; 07-032F

The Waste Division has completed its review of the Environmental Impact report for the Implementation of 2005 Base Realignment and Closure (BRAC), Fort Belvoir, Virginia) project at Fort Belvoir, Virginia. We have the following comments concerning the waste issues associated with this project:

Both solid and hazardous waste issues were addressed in the report. The report did include a search of waste-related data bases. The Waste Division staff performed a cursory review of its data files and determined that the facility is under DEQ's Federal Facilities program. It is on the CERCLIS list (VA5210020082 Fort Belvoir, Fairfax VA Not NPL), is a large quantity generator of hazardous waste and a treatment storage and disposal facility (US Army Engineering Center Fort Belvoir [VA7213720082] LQG & TSD), and has several solid waste sites. These are as follows.

US Army - Fort Belvoir, PBR 164, RMW Steam Sterilizer
US Army - Fort Belvoir, PBR 248, RMW Steam Sterilizer
US Army - Fort Belvoir, SWP 308, Closed Sanitary Landfill
US Army - Fort Belvoir, SWP 490, Closed CDD Landfill

The following websites may prove helpful in locating additional information for these identification numbers: http://www.epa.gov/echo/search_by_permit.html or http://www.epa.gov/enviro/html/rcris/rcris_query_java.html. Wade Smith of DEQ's Federal Facilities Program has been contacted for his review of this determination and will reply in a separate memo, if he identifies any additional issues.

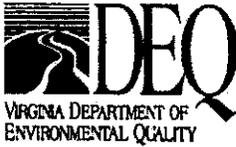
Any soil that is suspected of contamination or wastes that are generated during construction-related activities must be tested and disposed of in accordance with applicable Federal, State, and local laws and regulations. Some of the applicable state laws and regulations are: Virginia Waste Management

Act, Code of Virginia Section 10.1-1400 *et seq.*; Virginia Hazardous Waste Management Regulations (VHWMR) (9VAC 20-60); Virginia Solid Waste Management Regulations (VSWMR) (9VAC 20-80); Virginia Regulations for the Transportation of Hazardous Materials (9VAC 20-110). Some of the applicable Federal laws and regulations are: the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Section 6901 *et seq.*, and the applicable regulations contained in Title 40 of the Code of Federal Regulations; and the U.S. Department of Transportation Rules for Transportation of Hazardous materials, 49 CFR Part 107.

Also, all structures being demolished/renovated/ removed should be checked for asbestos-containing materials (ACM) and lead-based paint prior to demolition. If ACM or LBP are found, in addition to the federal waste-related regulations mentioned above, State regulations 9VAC 20-80-640 for ACM and 9VAC 20-60-261 for LBP must be followed.

Please note that DEQ encourages all construction projects and facilities to implement pollution prevention principles, including the reduction, reuse, and recycling of all solid wastes generated. All generation of hazardous wastes should be minimized and handled appropriately.

If you have any questions or need further information, please contact Paul Kohler at (804) 698-4208.



OFFICE OF AIR DATA ANALYSIS & PLANNING

TO: Ellie Irons, Environmental Impact Review Manager

FROM: Tom Ballou, Air Data Analysis and Planning Director
Thomas R. Ballou

SUBJECT: Fort Belvoir Draft Environmental Impact Statement & General Conformity Analysis

DATE: April 13, 2007

The purpose of this memorandum is to provide the comments of the Air Quality Division (AQD) on the Draft Environmental Impact Statement (DEIS) and General Conformity Analysis for Fort Belvoir, Virginia. This DEIS and conformity determination have been prepared in response to the 2005 Base Realignment and Closure (BRAC) recommendations which will result in a substantial increase of personnel and facilities at this Fort. Due to the fact that Fort Belvoir is located in the Washington, D.C. Metropolitan Area which has been designated a nonattainment area for two National Ambient Air Quality Standards (NAAQS), a general conformity analysis for this action is required by Section 176(c) of the Clean Air Act.

Obviously, this project and its air quality impacts are of great interest to us based on the air quality status of the Washington, D.C. area that currently violates the federal air quality standards for both the 8-hour ozone and fine particulate matter. These impacts are described in the draft documents in terms of air pollutant emission increases, both temporary and permanent, that will be produced by this action. Because the ozone precursor emissions increases from this project exceed the general conformity thresholds for the area, a determination must be made that the action conforms to the applicable air quality plan, and supports the overall goal of air quality standard compliance in the area. To do this, the project emission increases must be directly offset by equivalent reductions, or otherwise accounted for in the regional air quality planning process. The impacts and emission increases from this project occur in distinct phases and from several air pollutant source categories. Therefore, our specific comments are categorized and provided in the same manner.

Temporary Construction Phase

The construction project associated with this action is scheduled to be completed in a five year period from 2007 to 2011. The temporary air pollutant increases from this construction phase are by far the largest in term of mass emissions, with the largest impact occurring in 2010 (374 tons NO_x and 238 tons VOC). Lesser but still significant emissions levels are predicted for each year during the period from 2007 to 2011. As such, this phase is of most interest and concern to the AQD since it coincides with the period in which the

area must demonstrate compliance with both the 8-hour ozone and fine particulate matter standards. Further compounding this concern is that the project site is in a general upwind location to one of the worst case ozone monitors in the nonattainment area located at Mount Vernon, VA. This monitor currently has an ozone design value of 90 parts per billion which is the highest in the Northern Virginia area.

The project sponsor's proposed method of demonstrating conformity for the construction phase and resulting emissions is to compare them to the current 1-hour and pending 8-hour ozone SIP regional emission estimates for non-road (NO_x) and area sources (VOC) to demonstrate that they are:

- 1) Not significant at the regional level, and
- 2) Can be reasonably assumed to be included in the regional estimates for non-road and area sources.

While the precedent for using this method may exist through previous EPA actions, it has not yet been accepted by EPA Region III for the purpose of demonstrating general conformity for this particular project and situation. Therefore, the project sponsor should continue to explore all available means to demonstrate conformity for the construction phase of this project in the event that the proposed method is not acceptable.

It must be noted that there are **NO** proposed mitigation measures identified in the draft document to lessen the impact of these construction emissions during the critical attainment period. At the same time, the Washington region as a whole and individual jurisdictions such as Fairfax County are making substantial capital and resource commitments to reduce emissions to achieve cleaner air quality, and to make necessary transportation improvements.

Based on all the comments above, we believe this project sponsor should include and commit to implement a construction performance contract plan in the final EIS. This plan should include all reasonable emission control measures to minimize the impact of the construction activities related to this project. The measures to be considered should include, but not be limited to the following:

1. The exclusive use of new diesel engine standard compliant or control device retrofitted heavy construction equipment.
2. Strict restriction of equipment idling times.
3. Restriction or prohibition of construction on days when high ozone levels are predicted in the area. This should be done at a minimum on predicted code red days.

In addition, the construction project must fully comply with the following current and pending Virginia air pollution control regulations applicable to the project through the use of compliant practices and/or products:

- Article 1 - Visible emissions and fugitive dust/emissions

- Article 39 – Asphalt paving operations
- Article 40 – Open burning
- Article 42 – Portable fuel containers
- Article 49 – Architectural and industrial maintenance coatings
- Article 50 – Consumer products

The portable fuel container and consumer products rules are currently being revised and more restrictive requirements will be in effect no later than 2009. Also, this is not an all inclusive list, and project sponsor and any contractors should ensure compliance with all applicable Virginia air pollution control regulations.

Operational Phase

The air quality impacts from the Fort Belvoir project in its operational (post-construction phase) are generated mostly from increased local motor vehicle traffic and stationary source equipment operation required to support the new facilities on base.

The transportation impacts and infrastructure improvements needed to accommodate 22,000 additional personnel and commuters are well documented in the DEIS. A less detailed air quality impacts analysis is also provided. However, this analysis is limited and based on a number of assumptions on both the local and regional level.

In order to fully evaluate the air quality impacts from this and the other BRAC actions in the Capital area, the best and most current employment and traffic projections must be compiled and provided to the Metropolitan Washington Council of Government's Transportation Planning Board (TPB) to then be incorporated into the next regional transportation conformity determination for the Washington, D.C. nonattainment area. In this way, the overall transportation impact of BRAC can be determined and demonstrated to conform to the SIP. Also, all reasonable congestion mitigation practices should be employed to further reduce this impact. These measures should include ozone action days, code orange/red telecommuting, and public transportation programs.

The other major source of operational emissions and impacts will be the stationary source equipment to support the new facilities needed to accommodate the additional fort personnel. Depending on the selection of the final project configuration, either the major new source review for nonattainment area program (Article 9), or minor new source review permit program (Article 6) requirements of the state air pollution control regulations will apply to this project. The current estimate of the preferred alternative predicts emissions are below the major source threshold and therefore minor NSR would apply. However, the department would still be required to make a finding that the emissions increases are accounted for in the applicable SIP. Under any scenario, one or more air pollution control permit

applications should be submitted to the Northern Regional Office of DEQ as soon as the final project plan is selected. The project should also consider and evaluate environmentally beneficial control devices and/or strategies to further reduction the emissions from stationary source equipment, even if such devices would not be required by the applicable permitting process.

Other General Comments

It has been noted that there is no discussion of toxic air pollutant emissions and impacts in the DEIS. At a minimum an estimate of current and future total hazardous air pollutant emissions should be included in the final EIS, along with an evaluation of regulatory applicability.

The DEIS and conformity analysis identifies stationary source equipment and motor vehicles as the only source of operational emissions increases from this project. There is no mention of any anticipated emissions increases in area and non-road sources such as consumer products, solvent usage, gasoline distribution, landscaping, aircraft operations, and perhaps others. All sources of air pollution and projected emissions increases should be addressed in the final EIS.

cc: Jim Sydnor
Jeff Steers
Charlie Ellis



VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY
WASTE DIVISION
OFFICE OF REMEDIATION PROGRAMS

Memorandum

To: Charles H. Ellis III
Environmental Impact Review Coordinator

From: Wade M. Smith *Wade M. Smith*
Federal Facilities Remediation Project Manager

Through: Durwood H. Willis *Durwood H. Willis*
Federal Facilities Restoration Program Manager

Through: Chris M. Evans *Chris M. Evans*
Director, Office of Remediation Programs

Subject: Draft Environmental Impact Statement for
Implementation of 2005 Base Realignment and Closure (BRAC)
Recommendations and Related Army Actions at Fort Belvoir, Virginia

Date: March 19, 2007

The *Draft Environmental Impact Statement for Implementation of 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia* (Draft EIS) dated March 2007 was received by the Virginia Department of Environmental Quality's (DEQ's) Office of Remediation Programs (ORP) on March 2, 2007. Per the *Environmental Review Request Form* attached to the Draft EIS, comments are due to Charles H. Ellis of the DEQ's Office of Environmental Impact Review by March 30, 2007.

As stated in the Draft EIS, "The purpose of the EIS is to inform decision makers and the public of the likely environmental consequences of the proposed action and alternatives." The Draft EIS presents a Preferred Alternative, a Town Center Alternative, a City Center Alternative, and a Satellite Campuses Alternative. Additionally, inclusion of a No Action Alternative is prescribed by the President's Council of Environmental Quality (CEQ). Although the No Action Alternative is not possible without further congressional action, it serves as the benchmark against which federal actions can be evaluated.

The *Historical Records Review (HRR)* was completed for Fort Belvoir in March 2006. The HRR was performed to document historical information for Military Munitions Restoration Program (MMRP) sites and to support the Technical Project Planning process designed to facilitate decisions in areas where more information was needed to determine the next steps in the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process.

Specifically, a Site Inspection (SI) was completed as the next phase of the CERCLA process. The *Final MMRP Site Inspection Work Plan, Fort Belvoir, Virginia* (Work Plan) dated September 2006 was received by the DEQ's ORP on September 5, 2006. This Work Plan was developed to determine the presence or absence of munitions and explosives of concern (MEC) and munitions constituents (MC) that may remain from activities conducted by the Department of Defense (DoD) during operation at these sites and may pose a threat to human health and/or the environment.

Results of the HRR indicate that twenty-one eligible MMRP range areas exist at Fort Belvoir (Table 1-1, Map 1-1). Twenty of the MMRP sites are located on the Main Post, which is divided into two distinct areas: North Post and South Post. The additional MMRP site is located at the Environmental Proving Ground (EPG), which is a non-contiguous parcel of land located approximately 1.5 miles northwest of Main Post (Map 1-1). The EPG itself contains ten range areas (Table 2-1, Map 4-10).

According to the HRR, nineteen Solid Waste Management Units (SWMUs) (Table 3-1) were identified on the Main Post. SWMU A-12, Accotink Landfill, is located on both the Grenade Court and Small Arms Range Complex Range Areas.

The HRR also indicates that the United States Army Toxic and Hazardous Materials Agency (USATHAMA) completed an Environmental Baseline Study (EBS) at the EPG. Results of the Phase II portion of the EBS identified forty-four SWMUs (Table 4-1) and twelve Areas of Potential Concern (AOPCs) (Table 5-1) at the EPG.

The DEQ's Federal Facilities Restoration Program recommends contacting Ms. Laura Curtis, Directorate of Public Works, Environmental & Natural Resource Division, Fort Belvoir, Virginia at (703) 806-0024 for information concerning CERCLA obligations at Fort Belvoir's Main Post and EPG. Ms. Curtis, or her designee, should be advised prior to initiating any land, sediment, or groundwater disturbing activities at or near MMRP range areas, Main Post SWMUs, EPG SWMUs, and EPG AOPCs.

Please contact me at (804) 698-4125 or wmsmith@deq.virginia.gov with any additional questions.

Attachments: Table 1-1: MMRP Range Areas
Table 2-1: EPG Range Areas
Table 3-1: Main Post SWMUs
Table 4-1: EPG SWMUs
Table 5-1: EPG AOPCs
Map 1-1: Overview of MMRP Ranges
Map 4-10: EPG Range Areas

**TABLE 1-1
MMRP RANGE AREAS
MEMO - RE: DRAFT EIS
FORT BELVOIR, VIRGINIA**

MMRP RANGE AREAS
BOOBY TRAP SITE
COMBAT RANGE COMPLEX
COMBAT RANGE COMPLEX - TD
CONGRESSIONAL DEMONSTRATION AREA
DEMOLITION AREA
DEMOLITION AREA - TD
ENTRENCHMENT AND GAS SCHOOL AREA
EPG AREA
GAS AREA
GRENADE COURT
GUNSTON ROAD 1000" RIFLE RANGE
MINE AND BOOBY TRAP AREA
MOCK VILLAGE
MOUNTED PISTOL RANGE
PIG FARM RANGE
SMALL ARMS RANGE COMPLEX
SMALL ARMS RANGE COMPLEX - TD
SOUTHWEST PISTOL RANGE
TRACY ROAD RANGE
T-15 RANGE
T-16 RANGE

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**TABLE 2-1
EPG RANGE AREAS
MEMO - RE: DRAFT EIS
FORT BELVOIR, VIRGINIA**

RANGE 1
RANGE 1A
RANGE 2
RANGE 3
RANGE 4
RANGE 5
RANGE 5A
RANGE 5B
RANGE 5C
ABANDONED AIRSTRIP

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TABLE 3-1
 MAIN POST SWMUS
 MEMO - RE: DRAFT EIS
 FORT BELVOIR, VIRGINIA

SWMU	MAIN POST SWMUS	MAIN POST RANGE AREA
F-03	FORT BELVOIR MARINA ABOVE GROUND WASTE POL TANK	CONGRESSIONAL DEMONSTRATION AREA
N-17	FORT BELVOIR MARINA BATTERY STORAGE AREA	CONGRESSIONAL DEMONSTRATION AREA
C-08	BUILDING 2585 INACTIVE WASH RACK	DEMOLITION AREA
D-10	BUILDING 2585 GRIT CHAMBER	DEMOLITION AREA
G-01	BUILDING 2585 UNDERGROUND WASTE POL TANK	DEMOLITION AREA
L-03	DRUM, DEBRIS, AND TRANSFORMER STORAGE AREA	DEMOLITION AREA
L-21	BUILDING 2593 SILVER RECOVERY UNITS	DEMOLITION AREA
L-22	BUILDING 2595 SILVER RECOVERY UNITS	DEMOLITION AREA
A-08	GW VILLAGE LANDFILL	ENTRENCHMENT AND GAS SCHOOL AREA
A-09	MARKHAM SCHOOL LANDFILL	ENTRENCHMENT AND GAS SCHOOL AREA
A-16	INTERCEPTOR TRENCH	ENTRENCHMENT AND GAS SCHOOL AREA
A-17	INTERCEPTOR TRENCH	ENTRENCHMENT AND GAS SCHOOL AREA
A-12	ACCOTINK LANDFILL	GRENADE COURT
A-26	SUSPECTED SANITARY LANDFILL B	PIG FARM RANGE
A-12	ACCOTINK LANDFILL	SMALL ARMS RANGE COMPLEX
A-02	THEOTE ROAD CLOSED C/D/D LANDFILL	TRACY ROAD RANGE
C-11	BUILDING 715 WASHRACK	TRACY ROAD RANGE
D-11	BUILDING 715 OIL/WATER SEPARATOR	TRACY ROAD RANGE
L-39	RIFLE RANGE 1	TRACY ROAD RANGE
L-40	RIFLE RANGE	TRACY ROAD RANGE

TABLE 4-1
EPG SWMUs
MEMO - RE: DRAFT EIS
FORT BELVOIR, VIRGINIA

M-01	BUILDING 2021 BATTERY SHOP FORMER ACID PIT
M-02	BUILDING 2021 BATTERY SHOP STORAGE AREA
M-03	BUILDING 2041 WASTE FUEL DRUM STORAGE
M-04	BUILDING 2041 FORMER UNDERGROUND WASTE POL TANK
M-05	BUILDING 2034 SHOP SWEEPING DUMP SITE
M-06	BUILDING 2014 WASH RACK DRAINAGE DITCH
M-07	EPG INACTIVE FIRE EQUIPMENT TEST AREA
M-08	EPG ABANDONED ALUMINUM DRUMS AND EXCAVATION SITE
M-09	EPG UNNAMED DUMP 1
M-10	EPG UNNAMED DUMP 2
M-11	EMPTY DRUM STORAGE AREA 1
M-12	EMPTY DRUM STORAGE AREA 2
M-13	BUILDING 2041 OIL/WATER SEPARATOR 1 FOR THE STEAM CLEANING UNIT
M-14	BUILDING 2041 OIL/WATER SEPARATOR 2 FOR THE STEAM CLEANING UNIT
M-15	BUILDING 2041 IN-GROUND CONCRETE BLOCK
M-16	ABANDONED PAINT TEST AREA
M-17	BUILDING 2014 WASH RACK
M-18	EPG ABANDONED UNDERGROUND POL TANKS
M-19	BUILDING 2041 STEAM CLEANING UNIT
M-20	PDO SALVAGE YARD
M-21	BUILDING 2034 INDOOR WASTE POL TANK
M-22	BUILDING 2095 DUD BUNKER
M-23	BURNING GROUND
M-24	UNNAMED DUMP 3
M-25	UNNAMED DUMP 4
M-26	HYDROCARBON SPILL AREA
M-27	WASTE ORDNANCE PIT AT RANGE 1
M-28	TRIPOD AT RANGE 1
M-29	BULLET IMPACT AREA AT RANGE 1
M-30	LAND-MINE WEATHERING TEST AREA AT RANGE 1A
M-31	PLYWOOD BUILDING AT RANGE 2
M-32	BUILDING 2091 AT RANGE 5
M-33	INERT MINE TESTING AREA AT RANGE 5
M-34	WASTE ORDNANCE PITS AT RANGE 5
M-35	TROOP TRAINING AREA AT RANGE 5B
M-36	LEACHING CESSPOOLS (BUILDING 2034)
M-37	LEACHING CESSPOOLS (BUILDING 2073)
M-38	SEPTIC TANK SEEPAGE PITS (BUILDING T-2021)
M-39	UNNAMED DRY WELL
M-40	LEACH BED (BUILDING T-2037)
M-41	SEPTIC TANK AND LEACH FIELD (BUILDING 2075)
M-42	SEPTIC TANK AND LEACH FIELD (BUILDING 2098 AND T-2099)
M-43	SEPTIC TANK DRAIN FIELD (BUILDING 2089)
M-44	RADIOACTIVE DETECTOR COMPONENT

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**TABLE 5-1
EPG AOPCs
MEMO - RE: DRAFT EIS
FORT BELVOIR, VIRGINIA**

AOPC	EPG AOPC NAME
AOPC-1	SUSPECTED VEHICLE MAINTENANCE STRUCTURE
AOPC-2	FORMER GASOLINE TANKS
AOPC-3	BURNING SLABS
AOPC-4	BUILDING WITH CISTERN
AOPC-5	OPEN STORAGE NEAR UST REMOVAL
AOPC-6	SUSPECT DETONATION CRATER
AOPC-7	SMALL ARMES RANGE BACKSTOP (SEE M-29)
AOPC-8	DEMOLITION AREA
AOPC-9	DEPRESSION CONTAINING TRAINING MINES
AOPC-10	BURIAL GROUNDS (SEE M-9 AND M-10)
AOPC-11	SUSPECT FOUNDRY
AOPC-12	BUILDING 2042 AND UST

MARCH 19, 2007

applications should be submitted to the Northern Regional Office of DEQ as soon as the final project plan is selected. The project should also consider and evaluate environmentally beneficial control devices and/or strategies to further reduction the emissions from stationary source equipment, even if such devices would not be required by the applicable permitting process.

Other General Comments

It has been noted that there is no discussion of toxic air pollutant emissions and impacts in the DEIS. At a minimum an estimate of current and future total hazardous air pollutant emissions should be included in the final EIS, along with an evaluation of regulatory applicability.

The DEIS and conformity analysis identifies stationary source equipment and motor vehicles as the only source of operational emissions increases from this project. There is no mention of any anticipated emissions increases in area and non-road sources such as consumer products, solvent usage, gasoline distribution, landscaping, aircraft operations, and perhaps others. All sources of air pollution and projected emissions increases should be addressed in the final EIS.

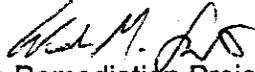
cc: Jim Sydnor
Jeff Steers
Charlie Ellis



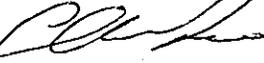
VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY
WASTE DIVISION
OFFICE OF REMEDIATION PROGRAMS

Memorandum

To: Charles H. Ellis III
Environmental Impact Review Coordinator

From: Wade M. Smith 
Federal Facilities Remediation Project Manager

Through: Durwood H. Willis 
Federal Facilities Restoration Program Manager

Through: Chris M. Evans 
Director, Office of Remediation Programs

Subject: Draft Environmental Impact Statement for
Implementation of 2005 Base Realignment and Closure (BRAC)
Recommendations and Related Army Actions at Fort Belvoir, Virginia

Date: March 19, 2007

The *Draft Environmental Impact Statement for Implementation of 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia* (Draft EIS) dated March 2007 was received by the Virginia Department of Environmental Quality's (DEQ's) Office of Remediation Programs (ORP) on March 2, 2007. Per the *Environmental Review Request Form* attached to the Draft EIS, comments are due to Charles H. Ellis of the DEQ's Office of Environmental Impact Review by March 30, 2007.

As stated in the Draft EIS, "The purpose of the EIS is to inform decision makers and the public of the likely environmental consequences of the proposed action and alternatives." The Draft EIS presents a Preferred Alternative, a Town Center Alternative, a City Center Alternative, and a Satellite Campuses Alternative. Additionally, inclusion of a No Action Alternative is prescribed by the President's Council of Environmental Quality (CEQ). Although the No Action Alternative is not possible without further congressional action, it serves as the benchmark against which federal actions can be evaluated.

The *Historical Records Review* (HRR) was completed for Fort Belvoir in March 2006. The HRR was performed to document historical information for Military Munitions Restoration Program (MMRP) sites and to support the Technical Project Planning process designed to facilitate decisions in areas where more information was needed to determine the next steps in the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process.

Specifically, a Site Inspection (SI) was completed as the next phase of the CERCLA process. The *Final MMRP Site Inspection Work Plan, Fort Belvoir, Virginia* (Work Plan) dated September 2006 was received by the DEQ's ORP on September 5, 2006. This Work Plan was developed to determine the presence or absence of munitions and explosives of concern (MEC) and munitions constituents (MC) that may remain from activities conducted by the Department of Defense (DoD) during operation at these sites and may pose a threat to human health and/or the environment.

Ellis,Charles

From: Hassell,Joseph
Sent: Friday, March 09, 2007 11:40 AM
To: Ellis,Charles
Subject: Fort Belvoir BRAC DEIS Comments 07-032F

The proposed realignment will increase personnel by 22,000 at Fort Belvoir. The preferred alternative will develop 800 acres of land and add 6.2 million square feet of built space in some 20 separate projects. Also some 7 million square feet of parking structures will be added. The preferred alternative spreads out the projects around the base primarily to address potential traffic congestion.

Like most any other development project, the primary impacts on water resources will be caused by increased impermeable surfaces, changes to storm water hydrographs, erosion and sedimentation increases during construction and increases in urban non point source runoff post construction. All of these potential problems that accompany development are well known and the Commonwealth has created environmental programs and permits to deal with them.

Each of the alternatives would have similar impacts to water resources. Therefore in view of the fact that there are other criteria that have overriding importance, such as traffic congestion, which is a big problem in Fairfax County, the Division of Water Resources does not have a preference among the proposed alternatives. Detailed storm water planning and permitting should be taken prior to construction.

Thank you for the opportunity to comment.

Joe Hassell
Division of Water Resources - DEQ
P. O. Box 1105
Richmond, VA 23218 (804) 698-4072

Ellis, Charles

From: Faha, Thomas
Sent: Friday, March 30, 2007 12:27 PM
To: Ellis, Charles
Cc: Marsala, Sarah; Batts, Dennis; Doucette, Richard
Subject: 07-032F - Ft Belvoir

Charlie,

The following are NVRO's comments on the draft EIS. Please let me know if you have any questions for us.

tom

VPDES Program

The draft EIS identifies stormwater and sanitary wastewater impacts and makes reference to permits that are needed from DEQ. Stormwater permitting is through DCR. With regard to sanitary wastes, the facility should make certain that capacity is available at Fairfax County's Noman Cole WWRP. The report should also state that the new sanitary sewer lines and pump stations must be reviewed and approved by DEQ prior to construction.

VWP Program

The Draft Environmental Impact Statement (EIS) indicates that surface waters are present within the proposed project limits and impacts to these resources are proposed. Therefore, a Virginia Water Protection (VWP) permit will be required from the Virginia Department of Environmental Quality (DEQ). DEQ has provided comments on the proposed project during pre-application meetings initiated by representatives from Fort Belvoir.

Air Program

We have no comments to offer.

Waste Program

Pg ES-15: Section ES.6.13, & pg 4-458: Section 4.15, Unavoidable Adverse Environmental Impacts and pg 4-396, BRAC Implementation and Facilities Project

The document states that approximately 8,410 tons of construction and demolition (C&D) debris will be generated from the proposed action and would be disposed of at various landfill sites in the area. To reduce the impact of this large quantity of C&D waste, the facility should promote the beneficial reuse or recycling of construction and demolition debris by sending the material slated for offsite disposal to a material recovery facility, instead of a landfill.

Pg 2-21, Section 2.2.2.3, Construction and Renovation

The document proposed that two new child-care facilities will be built on the Engineering Proving Ground (Child Development Center 55661 & 55662). The risk assessments to be performed for this area, and especially these facilities, should include the appropriate risk pathways and assumptions used for child-care centers.

Pg 4-390, Section 4.12.1.7, Solid Waste

The estimate of yard waste annually composted at the facility (3,000 tons) appears to be larger than anticipated. In addition, the reference information for Brooks, M.J. is missing from the reference section.

Pg 4-420, Section 4.13.1.2, Hazardous Waste

The GSA parcel (EPA ID # VA4470039336) was returned to compliance on February 15, 2007. All 12 violations were resolved.

Pg 4-420, Section 4.13.1.3, Solid Waste

The facility currently has four solid waste management facilities that have or are in the process of obtaining solid waste permits (SWP) or permits-by-rule (PBR) with the Virginia Department of Environmental Quality (DEQ). The facilities include: SWP 308,

Cullum Road Sanitary Landfill, which is closed and currently in post-closure monitoring; SWP 490, Theote Road C&D Landfill, which is closed and currently in post-closure; PBR 164, Dewitt Hospital, which performs steam sterilization of regulated medical waste; and DCEETA, which is currently applying for a permit-by-rule for an incinerator. Any new solid waste management facilities must determine if they are required to apply for a permit from the DEQ and follow the applicable regulations.

P 4-423, Section 4.13.1.4, Asbestos-Containing Material

The disposal or preparation for disposal, of any asbestos-containing material (ACM), must comply with the Special Waste Regulations of the Virginia Solid Waste Management Regulations, specifically 9 VAC 20-80-640.

General Comment on Waste Material

Both solid and potentially hazardous waste exist on the site and will continue to be created for any of the alternatives provided. All material that is not recyclable or reusable should be handled as solid waste in accordance with the Virginia Solid Waste Management Regulations (9 Virginia Administrative Code 20-80 et seq.). If the material is a solid waste, the facility is then responsible for determining if the material is a hazardous waste. This can be accomplished by either applying generator knowledge about the material, such as using the information from the label of a paint can to determine if it's hazardous or not, or by sampling the material in accordance with the Virginia Hazardous Waste Regulations (9 VAC 20-60 et seq.). Sampling may need to be done on unknown material, such as in the Engineering Proving Grounds. The facility should also continue to use the appropriate EPA Identification Numbers for each specific parcel (EPG, GSA, or main base) for tracking hazardous waste.

Thomas A. Faha
Water Permit Manager
DEQ-NVRO
13901 Crown Ct
Woodbridge, VA 22193
703/583-3846



COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION
1401 EAST BROAD STREET
RICHMOND, VIRGINIA 23219-2000

David S. Ekern, P.E.
COMMISSIONER

DEQ-Office of Environmental
Impact Review
MAR 27 2007
RECEIVED

March 22, 2007

Mr. Charles H. Ellis III
Department of Environmental Quality
Office of Environmental Impact Review
629 East Main Street, Sixth Floor
Richmond, VA 23219

RECEIVED

MAR 27 2007

DEQ-Office of Environmental
Impact Review

Re: Implementation of 2005 Base Realignment and Closure (BRAC), Fort Belvoir

Dear Mr. Ellis:

The Virginia Department of Transportation has reviewed the information provided for the referenced project. Our review covers impacts to existing and proposed transportation facilities.

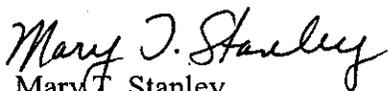
The travel forecasting methodology used by the Draft EIS traffic consultant was coordinated with VDOT staff and the assumptions made are reasonable given the limited amount of detailed data available. The DEIS appears quite thorough and does recognize the existing congestion on highways around Ft. Belvoir and the fact that the congestion will be made worse by the BRAC action. The impact of security checks on queuing and proposed mitigation measures could be addressed in more detail to provide assurance that such required checks will not impact mainline traffic.

Any VDOT land use requirements, lane closures, traffic control or work zone safety issues should be closely coordinated with Fairfax County and VDOT's Northern Virginia District Office (703-383-2888).

Additional comments are attached.

Thank you for the opportunity to comment on this project.

Sincerely,

A handwritten signature in cursive script that reads "Mary J. Stanley".

Mary J. Stanley

Environmental Engineer

Virginia Department of Transportation

(804) 786-0868

Document Comments

Document: Draft EIS, BRAC Impacts on Ft. Belvoir, VA

Date: March, 2007

Page	para.	Line	Comment
(intro)			Suggest that "affected jurisdictions" include more than just Fairfax County, albeit Fairfax will be the most affected; Federal agency offices will be leaving Arlington and other areas to move into Ft. Belvoir; Fig. 1-3 shows the extent of the region of influence for this project.
ES-4	ES.4.2		To provide decision-makers a more complete estimate of the BRAC impacts, suggest that an estimated construction cost be provided here for the "20 separate projects" mentioned, or at least refer the reader to the section in the DEIS where they are provided;
ES-8 (ES.6.2)	2	4	For accuracy and integrity, it should be made clear that "the developer" in this case is the Federal government
ES-9 (ES.6.3)	2	2	Some explanation is needed to clarify the statement that regional VMT will decrease. It is conceptually clear that if the metropolitan region is considered a closed system for commuter travel, then there will be little (if any) change since virtually the same number of commuters are traveling to Ft. Belvoir as commuted to the same agencies in their prior metropolitan locations. However, unless some data is provided at a macro level to show that increased commuting distances for personnel formerly commuting to locations in the District of Columbia or Maryland suburbs are balanced by shorter commuting distances for personnel residing south of the installation, it is an intellectual stretch to accept no overall change in VMT.
ES-16	3		By the same logic, the Federal Government (as the developer of the on-post changes that will impact traffic on adjacent public roads) should be responsible for mitigating these impacts.
ES-20 (ES.8.1)	3	6	If a 10% mode split reduces cars entering the installation by 725, the implication is that there are still over 6,000 cars entering that will presumably have to be cleared through some form of security check. The plan for quickly conducting such security checks, so that the entering cars do not back up onto mainline traffic, should be summarized here for reader understanding.
2-4			Table 2-1 will be clearer if like categories are listed in the same horizontal row (e.g., Training opposite Training, etc.)
4-47	2	7	The TransAction 2030 Plan is a product of the Northern Virginia Transportation Authority (NVTA), not the NVTC (an entity located in Arlington which deals chiefly with transit matters)
4-49	2 & 3		While the theory and information presented are useful when considering the macro effects of the BRAC movement, a more useful discussion would involve identifying the effects on roads in the vicinity of Ft. Belvoir of 22,000 new workers arriving and departing during the peak hours. Such concentrated impacts can not be swept

			aside by considering impacts on a regional or Fairfax-wide level.
4-50	4.3.2.5		For clarity, suggest citing the source for the volumes offered in Table 4.3-4 and the corresponding LOS.
4-52	1 & 2		The second full paragraph duplicates the content of the first.
4-55	1	8	Much of the information in this paragraph does not seem germane to the impact of the BRAC action. While comparison of Fort Belvoir to other development may have some utility, it is only relevant if the other development has similar access characteristics to Fort Belvoir – limited access points, limited transit service, adjacent roadways that are already congested and are physically (not to mention financially) difficult to improve, and limited options for effective mitigation.
4-66 & 4-67			Their reason to include statewide and regional population numbers in these tables (and similar tables for other alternatives) is not clear as this information is not germane. As mentioned above, at the regional level (and even less at the state level) the impact of BRAC on the transportation network is admittedly negligible since the region represents a closed system. However, at the micro level, the increase of 22,000 people on Fort Belvoir does have significant transportation impacts on the roads in the immediate vicinity of the installation.
4-69	1		Recommend clarifying the “completion” date (open to traffic, total project closeout, some other meaning?) for the Wilson Bridge project. The project website indicates that the second span will be open to traffic in 2008.
4-79			A consideration mentioned, but admittedly difficult to address in much detail, is the additional impact on congestion caused by consultants and others who do business with agencies to be located on the installation. The additional vehicles on the system from these employees could lower the LOS and makes the importance of mitigating measures even greater.
4-83	1		It should be clarified that the 2,000 – 3,000 vph available capacity and the resultant hours of queuing refer only to the roadway capacity – from Table 4.3-6 it is clear that security processing for that number of vehicles may extend the queuing for an even longer time.
4-85	4.3.4.4		The “rideshare facility” needs to be described more fully, even if only conceptually. Is this a parking lot (if so, how many spaces)? Where is it located and how will it be accessed? How many security gates will process vehicles going to the facility in the morning commuter arrival periods? Is a bus terminal or transfer station envisioned?
4-85	4.3.4.4		Clarify whether this “additional EPG access” refers to additional highway entrances to EPG, additional security gates, or both.
4-86	2		Please clarify whether the order-of-magnitude costs include a factor for right-of-way acquisition (or the assumption that none is needed) and a factor for utility relocation (typically a significant percentage of the overall project cost in northern Virginia).
4-88			Greatly expanded transit service should be considered among mitigation options. With a major transit center (Franconia-Springfield, with both Metrorail and VRE service) about 1 mile from

		<p>the EPG site, a much more extensive shuttle service from the center to EPG should be considered in order to help achieve a mode share greater than 10%. If the security check is performed at the transit center and designated commuter parking lots during the AM peak period, access time at EPG will be reduced. As indicated (page 4-89), shuttle bus service compares very favorably, in financial terms, with other mitigation options. In view of the cost, and project implementation lead time, for improving the affected highway network it may be useful for the Federal Government to consider increasing its monthly subsidy payment for those BRAC employees who use public transportation, at least on a temporary basis.</p>
4-92		<p>Was the time for security processing of commuter buses examined or estimated in order to gage whether this impact creates significant delays or queues on access roads? 350 riders (5% mode share) equates to about 9 buses in the peak period.</p>
4-134	4.3.8.2	<p>Even assuming a 33% mode shift to transit or carpools, 18,000 new employees at EPG translates to at least 12,000 vehicles desiring to enter the site, probably during a 1 or 2-hour period. What is the estimated time it will take to clear these vehicles into the outer perimeter, either using tag-reading equipment or personnel viewing a decal on the vehicle? What length queue will this clearance generate? Will commuter buses have a significant impact on this?</p>

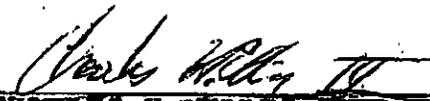
If you cannot meet the deadline, please notify CHARLIE ELLIS at 804/698-4488 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

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- C. Use your agency stationery or the space below for your comments. **IF YOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.**

Please return your comments to:

MR. CHARLES H. ELLIS III
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX #804/698-4319


~~CHARLES H. ELLIS III~~
ENVIRONMENTAL PROGRAM PLANNER

COMMENTS

Please be advised that the Marine Resources Commission, pursuant to Section 28.2-1204 of the Code of Virginia, has jurisdiction over any encroachments in, on, or over any State-owned rivers, streams, or creeks in the Commonwealth. Accordingly, if any portion of the subject projects involves any encroachments channelward of ordinary high water along natural rivers and streams, a permit may be required from our agency.

(signed) E. J. Sullivan (date) 3/14/07
(title) Environmental Engineer
(agency) UMRC



COMMONWEALTH of VIRGINIA

L. Preston Bryant, Jr.
Secretary of Natural Resources

Department of Historic Resources
2801 Kensington Avenue, Richmond, Virginia 23221

Kathleen S. Kilpatrick
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
TDD: (804) 367-2386
www.dhr.virginia.gov

April 4, 2007

Colonel Brian W. Lauritzen
Department of the Army
Installation Management Agency
Headquarters, U.S. Army Garrison, Fort Belvoir
Directorate of Installation Support
9820 Flagler Road, Suite 213
Fort Belvoir, Virginia 22060-5928

Re: Draft Environmental Impact Statement (EIS) for Update of the Land Use Plan of the Real Property Master Plan and BRAC Actions at Fort Belvoir
Ft. Belvoir, Fairfax County
DHR File No. 2006-0820

Dear Colonel Lauritzen:

We have received your request for our review and comment on the draft Environmental Impact Statement (DEIS) for the update of the Land Use Plan of Fort Belvoir's Real Property Master Plan (RPMP) and implementation of base realignment associated with the 2005 Base Realignment and Closure (BRAC) law. It is our understanding that the realignment will result in the relocation of fifty-nine agencies/activities to Fort Belvoir representing an increase in the installation population of approximately 22,000 civilian and military personnel. The actions necessary to support the BRAC undertaking require an update of the post's 1993 (amended 2002) RPMP. The BRAC realignment actions involve extensive new construction and renovation of existing facilities in order to accommodate incoming units, agencies, and activities.

There are a number of significant historic, architectural, and archaeological resources on or near Fort Belvoir that are listed in or eligible for the National Register of Historic Places. These historic properties include the site of the Belvoir Manson Ruins and adjacent Fairfax Grave Site (Site 44FX0004), the Fort Belvoir Historic District, Pohick Church, Woodlawn Plantation, Alexandria Friends Meeting House, the Woodlawn Historic District, George Washington Grist Mill, Gunston Hall, and Mount Vernon. Among these properties, the National Park Service has

Administrative Services
10 Courthouse Avenue
Petersburg, VA 23803
Tel: (804) 863-1624
Fax: (804) 862-6196

Capital Region Office
2801 Kensington Ave.
Richmond, VA 23221
Tel: (804) 367-2323
Fax: (804) 367-2391

Tidewater Region Office
14415 Old Courthouse Way, 2nd Floor
Newport News, VA 23608
Tel: (757) 886-2807
Fax: (757) 886-2808

Roanoke Region Office
1030 Penmar Ave., SF
Roanoke, VA 24013
Tel: (540) 857-7585
Fax: (540) 857-7588

Northern Region Office
5357 Main Street
PO Box 519
Stephens City, VA 22655
Tel: (540) 868-7031
Fax: (540) 868-7033

Page 2
April 4, 2007
Colonel Brian W. Lauritzen

designated Woodlawn Plantation, Mount Vernon, and Gunston Hall National Historic Landmarks, its highest recognition.

The DEIS, with not a little understatement, reads, "Long-term minor adverse effects could occur to historic properties as a result of some of the 20 proposed projects under the Preferred Alternative" (Page 4-300). The document continues, "The potential adverse effects to historic properties would include direct and indirect effects to their integrity (i.e., physical harm or change) and direct visual effects to their setting" (Page 4-300). The historic properties the DEIS identifies as being potentially adversely affected by the BRAC actions are the Fort Belvoir Historic District, one eligible and one potentially eligible archaeological sites, and the Friends Meeting House and Burial Ground. Despite this claim, we suspect that more historic properties have the potential to be adversely affected than just those listed in the DEIS as a result of BRAC at Fort Belvoir. In some instances the impacts that the BRAC and related activities may have cannot be anticipated or mitigated at this time. This is because the implementation plans are not fully known. For example, we understand that the Army is not certain as to which buildings within the Fort Belvoir Historic District will house specific tenants. Without that knowledge it is impossible to assess the impacts that possible alterations necessary to address the mission of new tenants will have on contributing buildings within the historic district.

The National Environmental Policy Act (NEPA) requires federal agencies to identify and evaluate the full range of impacts to the environment that its actions may have. The rapid influx of approximately 22,000 new residents will place increased strain on an already over burdened transportation infrastructure in Fairfax County. Additionally, the need for new and affordable housing will likely require local zoning changes, new construction, installation of utilities, and other associated development. These undertakings are likely to affect historic properties beyond Fort Belvoir's reservation boundaries. The environmental document must consider not only the direct consequences of BRAC related activities, but also secondary outcomes that might impact cultural resources. Some of these indirect and secondary effects may include increased auditory and visual impacts resulting from increased automobile traffic, new development in communities serving Fort Belvoir, diminished access to heritage destinations, and new road construction needed to support the increase in population.

As described in the DEIS, the transportation analysis and design study for the BRAC action will continue throughout the planning phase and, therefore, more details will emerge as the process matures. However, for the purpose of gathering enough information for the current environmental document, the Army used the regional travel demand model maintained by the Metropolitan Washington Council of Governments (MWCOCG) in order to estimate the traffic

Page 3
April 4, 2007
Colonel Brian W. Lauritzen

impacts expected from BRAC. Although this method may be expedient for the purposes of the DEIS, we believe that as the study progresses the implications of BRAC on the transportation infrastructure will be greater than first anticipated. Any negative effects to historic properties caused by increases in traffic—like new road construction—will need to be addressed in the EIS and mitigated for in the Section 106 process.

Similarly, land use consequences arising from the influx of the approximately 22,000 new employees and residents of Fort Belvoir must be thoroughly examined and their adverse effects to historic properties mitigated in order to satisfy the requirements of NEPA and Section 106. As with the regional transportation situation, an infusion of residents in an area that is finding it difficult to cope with the natural rise in population will only add to an already stretched housing market and public services capability. New construction to meet residential, social, and commercial demands is likely further diminish the existing settings of area historic resources, such as Woodlawn Plantation, and may result in adverse effects due to visual, auditory or other environmental degradations. The EIS document must anticipate such eventualities and take into account those effects that are reasonably foreseeable, may be farther removed in distance and time, and are cumulative. Such an evaluation is also expected within the Section 106 process.

With regard to archaeology, we have the following comments.

- Sections 4.9.1.3.1 and 4.9.4.1.1: Has the recommendation for the archaeological potential, or lack thereof, of the GSA Parcel been submitted to DHR for review and concurrence?
- Section 4.9.2.3.2: It is important to note that additional archaeological evaluation (Phase II investigation) may be necessary to determine the National Register eligibility of sites currently considered potentially eligible. We understand that Phase II evaluation of site 44FX1933 has recently been completed. Please submit two copies of the report when available for our consideration along with the Army's recommendation on National Register eligibility.

If you have any questions about our comments, please call me at (804) 367-2323, Ext. 114.

Sincerely,



Marc Holma, Architectural Historian
Office of Review and Compliance

Cc: Mr. Bill Sanders, Fort Belvoir
Ms Kelly Yasaitis Fanizzo, ACHP
Ms Judy Riggan, Alexandria Monthly Meeting
Ms Martha Catlin
Ms Linda Cornish Blank, Fairfax County Planning and Zoning
Ms Elizabeth Merritt, National Trust for Historic Preservation
Mr. Ross Randall, Woodlawn Plantation
Ms Deanna Beacham, Virginia Council on Indians
Mr. C. Richard Bierce, Fairfax County Architectural Review Board
Mr. Robert E. Beach, Fairfax County History Commission
Mr. Mike Johnson, Fairfax County Parks and Recreation
Mr. Ronald Chase, Gum Springs Historical Society
Mr. Thomas Lainhoff, Gunston Hall Plantation
Mr. James Rees, Mount Vernon/George Washington Grist Mill
Mr. Bill Bolger, National Park Service
Reverend Donald Binder, Pohick Church
Mr. Richard Hill, Tuscarora Nation of New York
Ms Lisa Stopp, United Keetoowah Band of Charokee Indians in Oklahoma
Mr. George Schuck, Woodlawn Baptist Church
Mr. Charles H. Ellis III, DEQ

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629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
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APR 04 2007

DEQ-Office of Environmental
Impact Review

Charles H. Ellis III
CHARLES H. ELLIS III
ENVIRONMENTAL PROGRAM PLANNER

COMMENTS

This project poses no impact to mineral resources.

(signed) *[Signature]* (date) *4/2/07*
(title) *budget Manager*
(agency) *EGMME*

If you cannot meet the deadline, please notify CHARLIE ELLIS at 804/698-4488 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

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DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX #804/698-4319


~~CHARLES H. ELLIS III~~
ENVIRONMENTAL PROGRAM PLANNER

COMMENTS

The Department of Forestry finds limited impact to the forest resources of the Commonwealth for this project.

(signed)

Todd A. Groh

(date)

3/30/07

(title)

Asst. Director - Forest Management

(agency)

VA Department of Forestry



53

COMMONWEALTH of VIRGINIA

L. Preston Bryant, Jr.
Secretary of Natural Resources

Department of Historic Resources
2801 Kensington Avenue, Richmond, Virginia 23221

Kathleen S. Kilpatrick
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
TDD: (804) 367-2386
www.dhr.virginia.gov

April 4, 2007

Colonel Brian W. Lauritzen
Department of the Army
Installation Management Agency
Headquarters, U.S. Army Garrison, Fort Belvoir
Directorate of Installation Support
9820 Flagler Road, Suite 213
Fort Belvoir, Virginia 22060-5928

Re: Draft Environmental Impact Statement (EIS) for Update of the Land Use Plan of the Real Property Master Plan and BRAC Actions at Fort Belvoir
Ft. Belvoir, Fairfax County
DHR File No. 2006-0820

Dear Colonel Lauritzen:

We have received your request for our review and comment on the draft Environmental Impact Statement (DEIS) for the update of the Land Use Plan of Fort Belvoir's Real Property Master Plan (RPMP) and implementation of base realignment associated with the 2005 Base Realignment and Closure (BRAC) law. It is our understanding that the realignment will result in the relocation of fifty-nine agencies/activities to Fort Belvoir representing an increase in the installation population of approximately 22,000 civilian and military personnel. The actions necessary to support the BRAC undertaking require an update of the post's 1993 (amended 2002) RPMP. The BRAC realignment actions involve extensive new construction and renovation of existing facilities in order to accommodate incoming units, agencies, and activities.

There are a number of significant historic, architectural, and archaeological resources on or near Fort Belvoir that are listed in or eligible for the National Register of Historic Places. These historic properties include the site of the Belvoir Manson Ruins and adjacent Fairfax Grave Site (Site 44FX0004), the Fort Belvoir Historic District, Pohick Church, Woodlawn Plantation, Alexandria Friends Meeting House, the Woodlawn Historic District, George Washington Grist Mill, Gunston Hall, and Mount Vernon. Among these properties, the National Park Service has

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Petersburg, VA 23803
Tel: (804) 863-1624
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Capital Region Office
2801 Kensington Ave.
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Tel: (804) 367-2323
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Tidewater Region Office
14415 Old Courthouse Way, 2nd Floor
Newport News, VA 23608
Tel: (757) 886-2807
Fax: (757) 886-2808

Roanoke Region Office
1030 Penmar Ave., SE
Roanoke, VA 24013
Tel: (540) 857-7585
Fax: (540) 857-7588

Northern Region Office
5357 Main Street
PO Box 519
Stephens City, VA 22655
Tel: (540) 868-7031
Fax: (540) 868-7033

designated Woodlawn Plantation, Mount Vernon, and Gunston Hall National Historic Landmarks, its highest recognition.

The DEIS, with not a little understatement, reads, "Long-term minor adverse effects could occur to historic properties as a result of some of the 20 proposed projects under the Preferred Alternative" (Page 4-300). The document continues, "The potential adverse effects to historic properties would include direct and indirect effects to their integrity (i.e., physical harm or change) and direct visual effects to their setting" (Page 4-300). The historic properties the DEIS identifies as being potentially adversely affected by the BRAC actions are the Fort Belvoir Historic District, one eligible and one potentially eligible archaeological sites, and the Friends Meeting House and Burial Ground. Despite this claim,

we suspect that more historic properties have the potential to be adversely affected than just those listed in the DEIS as a result of BRAC at Fort Belvoir. In some instances the impacts that the BRAC and related activities may have cannot be anticipated or mitigated at this time. This is because the implementation plans are not fully known. For example, we understand that the Army is not certain as to which buildings within the Fort Belvoir Historic District will house specific tenants. Without that knowledge it is impossible to assess the impacts that possible alterations necessary to address the mission of new tenants will have on contributing buildings within the historic district.

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The National Environmental Policy Act (NEPA) requires federal agencies to identify and evaluate the full range of impacts to the environment that its actions may have. The rapid influx of approximately 22,000 new residents will place increased strain on an already over burdened transportation infrastructure in Fairfax County. Additionally, the need for new and affordable housing will likely require local zoning changes, new construction, installation of utilities, and other associated development. These undertakings are likely to affect historic properties beyond Fort Belvoir's reservation boundaries. The environmental document must consider not only the direct consequences of BRAC related activities, but also secondary outcomes that might impact cultural resources. Some of these indirect and secondary effects may include increased auditory and visual impacts resulting from increased automobile traffic, new development in communities serving Fort Belvoir, diminished access to heritage destinations, and new road construction needed to support the increase in population.

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As described in the DEIS, the transportation analysis and design study for the BRAC action will continue throughout the planning phase and, therefore, more details will emerge as the process matures. However, for the purpose of gathering enough information for the current environmental document, the Army used the regional travel demand model maintained by the Metropolitan Washington Council of Governments (MWCOCG) in order to estimate the traffic

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impacts expected from BRAC. Although this method may be expedient for the purposes of the DEIS, we believe that as the study progresses the implications of BRAC on the transportation infrastructure will be greater than first anticipated. Any negative effects to historic properties caused by increases in traffic—like new road construction—will need to be addressed in the EIS and mitigated for in the Section 106 process.

S3.3
continued

Similarly, land use consequences arising from the influx of the approximately 22,000 new employees and residents of Fort Belvoir must be thoroughly examined and their adverse effects to historic properties mitigated in order to satisfy the requirements of NEPA and Section 106. As with the regional transportation situation, an infusion of residents in an area that is finding it difficult to cope with the natural rise in population will only add to an already stretched housing market and public services capability. New construction to meet residential, social, and commercial demands is likely further diminish the existing settings of area historic resources, such as Woodlawn Plantation, and may result in adverse effects due to visual, auditory or other environmental degradations. The EIS document must anticipate such eventualities and take into account those effects that are reasonably foreseeable, may be farther removed in distance and time, and are cumulative. Such an evaluation is also expected within the Section 106 process.

S3.4

With regard to archaeology, we have the following comments.

- Sections 4.9.1.3.1 and 4.9.4.1.1: Has the recommendation for the archaeological potential, or lack thereof, of the GSA Parcel been submitted to DHR for review and concurrence?
- Section 4.9.2.3.2: It is important to note that additional archaeological evaluation (Phase II investigation) may be necessary to determine the National Register eligibility of sites currently considered potentially eligible. We understand that Phase II evaluation of site 44FX1933 has recently been completed. Please submit two copies of the report when available for our consideration along with the Army's recommendation on National Register eligibility.

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S3.6

If you have any questions about our comments, please call me at (804) 367-2323, Ext. 114.

Sincerely,



Marc Holma, Architectural Historian
Office of Review and Compliance

Cc: Mr. Bill Sanders, Fort Belvoir
Ms Kelly Yasaitis Fanizzo, ACHP
Ms Judy Riggan, Alexandria Monthly Meeting
Ms Martha Catlin
Ms Linda Cornish Blank, Fairfax County Planning and Zoning
Ms Elizabeth Merritt, National Trust for Historic Preservation
Mr. Ross Randall, Woodlawn Plantation
Ms Deanna Beacham, Virginia Council on Indians
Mr. C. Richard Bierce, Fairfax County Architectural Review Board
Mr. Robert E. Beach, Fairfax County History Commission
Mr. Mike Johnson, Fairfax County Parks and Recreation
Mr. Ronald Chase, Gurn Springs Historical Society
Mr. Thomas Lainhoff, Gunston Hall Plantation
Mr. James Rees, Mount Vernon/George Washington Grist Mill
Mr. Bill Bolger, National Park Service
Reverend Donald Binder, Pohick Church
Mr. Richard Hill, Tuscarora Nation of New York
Ms Lisa Stopp, United Keetoowah Band of Charokee Indians in Oklahoma
Mr. George Schuck, Woodlawn Baptist Church
Mr. Charles H. Ellis III, DEQ

54



COMMONWEALTH of VIRGINIA

Office of the Governor

P.O. Box 1475
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Pierce R. Homer
Secretary of Transportation

(804) 786-8032
Fax: (804) 786-6683
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May 1, 2007

Attn.: EIS Comments
Fort Belvoir Directorate of Public Works
9430 Jackson Loop, Suite 100
Fort Belvoir, Virginia 22060-5116

Dear Sir/Madam:

Attached, please find the Virginia Department of Transportation and the Virginia Department of Rail and Public Transportation comments on the Draft Environmental Impact Statement for the Implementation of 2005 Base Realignment and Closure Recommendations and Related Army Actions at Fort Belvoir, Virginia. These comments are in addition to my formal testimony (also attached) provided at the April 17, 2007 public hearing.

I am also submitting for the public record a copy an independent review of the Army's "Preferred Land Use Alternative." Parson Brinkerhoff was hired by the Virginia Department of Transportation to assist in reviewing the traffic modeling performed by your consultant as well as provide more detailed review of the Draft Environmental Impact Statement. Please consider this report as part of the Agency's formal comments.

As I stated in my April 17 comments, the preferred alternative simply does not work for the Army or the Commonwealth. The Army and the Commonwealth can and should work together to develop a land use and transportation scenario that is achievable and beneficial to both.

Thank you in advance for considering and responding to our comments.

Sincerely,

Handwritten signature of Pierce R. Homer in black ink.
Pierce R. Homer

Attachments
PRH:es

Copy: Mr. Davis S. Ekern
Mr. Matthew O. Tucker
Mr. Richard Walton
Mr. Dennis Morrison

**Virginia Department of Transportation/Department of Rail
and Public Transportation Comments on the Draft
Environmental Impact Statement Implementation of 2005 Base
Realignment and Closure (BRAC) Recommendations and
Related Army Actions at Fort Belvoir, Virginia**

April 27, 2007

Summary

The Army is required to prepare the DEIS under NEPA which was enacted by Congress to ensure that whenever federal agencies or wherever federal funds are used for major projects, the impacts of that project on the natural and the human environment must be studied. Different alternatives and their impacts are proposed and analyzed. The purpose is to ensure that when the choice is made on where or how the project will be built, the impacts will be as minimal as possible (or minimized).

Typically, during this process, mitigating actions are identified to lessen the negative impacts of the project and are included as a part of the project. But this is not the case here. In its DEIS, the Army has noted the devastating impact the BRAC action will have on the road system around Fort Belvoir and they have listed the mitigating actions needed to address the traffic impacts, but the Army is specifically not proposing to include these mitigating actions in their project or to provide funding for them.

Even worse, the Army hints on page 4-137, that Defense Access Road (DAR) funding will be available to help fund road mitigation projects. However, DAR funding is limited, difficult to obtain, and every other BRAC facility in the nation will be fighting for the limited funding available. In fact, many of the 13 mitigating highway improvement projects are not eligible for DAR funding under existing Army law, but the DEIS does not tell you that. The DEIS tells you the funding is available "within the legal authority of the Army" – just not that most of it is not allowed by the law. It appears the Army is relying on the citizens of the Commonwealth to bear the expense of relieving the traffic nightmare the BRAC action will be creating.

The DEIS essentially describes potential land use changes attributable to BRAC studies but defers the required analysis of associated environmental consequences generated by a decision until after approvals are granted. It fails the test of reasonableness by excluding discussions of direct and indirect impacts related to transportation infrastructure improvements necessary to support implementation of the preferred alternative changes. The focus is on what is occurring at the Fort, not the direct impacts and effects on the

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surrounding roadways and the indirect impacts on the surrounding roadways as well.

This action by the Army will have a significant adverse impact on the quality of life for the human environment for those who live near the Fort, in the Region, and are just passing through on the main highways that will be affected. Additional time spent stopped in traffic is a negative impact on our quality of life. Even more disturbing is how safety is negatively impacted by increases in traffic and backups on the interstates and throughways which can cause more accidents with resulting fatalities and injuries.

These reviews of direct, indirect and cumulative impacts are required under NEPA as part of the "hard look" that is required of a federal agency proposing to take a major action so that they will make an informed decision when they do make a decision. The Army is making an independent decision as if it were in a vacuum without regard for what or how the direct, indirect or cumulative impacts of its action will affect the human and natural environment around and in the vicinity of the Fort and in that region and for people using the main highways passing through the region. Congress enacted NEPA to prevent this very situation from occurring.

The designation of a preferred alternative appears to be based upon the acknowledgement that "...traffic-related issues and development density; specifically, use of the EPG for all base realignment units, agencies and activities would have resulted in development densities that might not be supportable because of traffic congestion." Notwithstanding this recognition, the DEIS excludes substantive analysis of site access requirements. The DEIS fails to adequately identify needed independent transportation improvements, any associated effects, funding sources, timing requirements and required approvals. Furthermore, it lacks evidence of required consultation under NEPA with state and federal transportation officials to address this issue.

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The Army's DEIS quite openly states that its focus is facing inward in this project - focusing on building new buildings on the EPG for new personnel, building roads on the post for on post traffic and getting the Fairfax County Parkway completed with some new access points so that their personnel can get to work at the EPG and on the Fort as quickly as possible. But that only addresses a very small portion of the traffic impact that will occur when 22,000 new personnel show up on September 15, 2011. Page 4-84 of the DEIS states,

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Implementing the Preferred Alternative would result in significant adverse effects to the transportation system with respect to congestion and increased travel time. These effects would lead to reduced employee productivity, higher commuting costs, and degradation of quality of life. These effects would not be limited to personnel at Fort Belvoir. Through commuters and the local community would also be affected.

The Army's failure to include in its proposed preferred alternative adequate road improvements needed to mitigate the impacts of its BRAC action on the human environment fails to meet the purpose of NEPA. The Army is proposing to develop the EPG into an office park for 18,000 people to work there. The DEIS also indicates they are planning on renting out office space on the EPG for profit – how many more people will that bring to the post? The DEIS just indicates that that impact will be addressed in the future.

Therefore, the Army should amend the DEIS to comply with NEPA, to address the impacts the BRAC action will have on the roadway system in the vicinity of the post and to include actions to mitigate the impacts they will be causing. The Army needs to adhere to Federal law by adequately mitigating the impacts its actions will have on the transportation systems and thus reduce the significant, negative effect it will have on the quality of life of our citizens.

54.5

CEQ Implementing Regulations for NEPA

Part 1501.7 – Scoping

This section of the regulations requires the determination of the scope and the significant issues of the proposed action that are to be analyzed in depth in the environmental impact statement. "Scope" is defined in 40 CFR Section 1508.25. It "consists of the range of actions, alternatives, and impacts to be considered in an environmental impact statement. ... To determine the scope of environmental impact statements, agencies shall consider 3 types of actions, 3 types of alternatives, and 3 types of impacts." The Army inappropriately limited its scope to obtaining a revised land use plan and to realigning its functions as directed by the BRAC commission. However, in accordance with NEPA, the scope of this action would include most if not all of the list of 13 mitigating highway improvements because they are **connected actions** as defined in 40 CFR Section 1508.25(a)(1). The Army's action meets the criteria for connected actions with the transportation mitigation improvements under NEPA because the Army's action automatically triggers the transportation mitigation improvements.

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Part 1502.1 – Purpose

"The primary purpose of an environmental impact statement is to serve as an action-forcing device to ensure that the policies and goals defined in the Act are infused into the on going programs and action of the Federal Government. It shall provide full and fair discussion of significant environmental impacts and will inform decisionmakers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment.... An environmental impact statement is more than a disclosure document. It shall be used by Federal officials in conjunction with other relevant material to plan actions and make decisions."

The Army states its purpose as twofold in this DEIS – to revise its land use plan within its master plan and to realign its function in accordance with the BRAC commission mandate. The bottom line is that the major purpose of the BRAC realignment is to have 22,000 new personnel show up for work by September 2011 and the need is to address the environmental impacts through the NEPA process that this huge federal action will have on both the human and the natural environment both in the region of the Fort, in the vicinity of the Fort and in the immediate area of the Fort and on the Fort itself. The scope, purpose and need enumerated and chosen by the Army is so limited that it does not meet the requirements of NEPA. The scope must be revised to include the transportation needs and impacts related to getting the BRAC action employees in place and mitigating the adverse impacts caused by that action and the purpose and need also need to be revised to include those true factors as well.

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In addition, the draft DEIS presented by the Army does not fulfill the purpose required by the regulations in part because it has not provided full and fair discussions of the significant environmental impacts, including impacts on the human environment regarding transportation impacts and it has not been used by Federal officials to plan actions and make decisions regarding transportation improvements that are obviously necessary to support the preferred alternative.

Part 1502.2(g) – Implementation

“Environmental impact statements shall serve as the means of assessing the environmental impact of proposed agency actions rather than justifying decisions already made.”

In Summary, the DEIS only addresses alternatives related to land use changes on Fort Belvoir in order to determine such issues as where will the office spaces be for the 22,000 additional employees arriving by 2011 in response to the BRAC action. It does not discuss the required highway improvements necessary for providing access to the site for those employees nor does it address in any detail the necessary roadway improvements in the surrounding roadway network that will be necessary to address the impact that additional inflow and outflow will have. The DEIS does not address effects and values in adequate detail to support informed decision-making or to compare environmental, economic, and technical issues as required by the federal regulations for proper decision making.

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The failure to adequately evaluate site access concurrently with land use planning means that the land use recommendations made in the DEIS may not be appropriately developed for decision-making at this time. Unknown factors surrounding the viability of highway access could later invalidate land use decisions. Those unknown factors include the environmental impacts of road improvements, the need for enabling state and federal approvals, the extent of

improvement needed and a source of funding for that work. Failure to address those issues concurrent with the land use study could undermine the purpose and need for land use changes and compromise study schedules.

Part 1502.9 (a)

In accordance with 40 CFR Section 1502.9(a), the proposed Draft Environmental Impact Statement (DEIS) is "so inadequate as to preclude meaningful analysis", therefore the Army must prepare and circulate a revised draft. The scope is flawed and therefore the document needs to be revised in accordance with National Environmental Policy Act (NEPA) requirements.

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The DEIS not only does not meet the NEPA statutory and regulatory requirements, it is a document of conjecture that is a generalized inventory of existing conditions with generalized references to possible impacts in the future. It needs to be redrafted to comply with the NEPA requirements that are clearly laid out in 40 CFR Sections 1500-1508. Until they have done so, the Army should not consider issuing a Final Environmental Impact Statement and a Record of Decision for the proposed action.

DEIS Section 4.3 Transportation

Section 4.3.1.2 - Transportation Analysis and Design states that "At this point, the studies have been taken to a level of detail sufficient for an EIS, thereby allowing for the assessment of the transportation systems and the identification of potential mitigating actions." We disagree with this statement. More detailed operational analyses are needed to determine the adequacy of the proposed mitigation improvements.

The DEIS states: "In the Conference Report on the National Defense Authorization Act for Fiscal Year 2007, the conferees identified the following Items of Special Interest:

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"The conferees note that the decisions of the 2005 Defense Base Closure and Realignment (BRAC) round will have a significant impact on the transportation infrastructure and national highway system in Northern Virginia supporting Fort Belvoir and Marine Corps Base Quantico. These effects, if not studied and addressed through a long-term investment strategy, have the potential to adversely affect timely access to these two critical military installations, as well as the quality of life for military members and their families on the installations and in the local communities."

"The conferees direct the Secretary of the Army to work with appropriate Federal, Commonwealth, and local agencies to ensure the draft and final environmental impact statements address the following factors:

- (1) a description of the demographic, population, and other planning assumptions used to determine traffic infrastructure requirements;
- (2) an analysis of the direct and indirect impact to the transportation infrastructure resulting from the BRAC decisions;
- (3) a description of the standards and methodologies for the traffic impact studies contained in the study; and
- (4) an assessment of specific traffic infrastructure improvements and new construction projects identified to mitigate the effects of the increase of personnel, and estimates of the costs to carry out the projects."

We concur with the conferees' findings that BRAC decision related to Fort Belvoir will have a significant impact on the transportation infrastructure in Northern Virginia and that these impacts will adversely affect the quality of life and therefore the human environment in this region. The DEIS does not meet the mandated requirements the conferees directed the Secretary of the Army to meet and therefore it needs to be redrafted.

In addition, it should also be noted that Interstate 95 is the main north/south highway between Maine and Florida and it traverses Fort Belvoir property serving interstate commerce, tourism, commuters, the military, and the Nation's Capital. This section of highway currently carries an estimated 300,000 vehicles per day, has a level of service F and frequent stop and go conditions. With the addition of the BRAC impacts at Fort Belvoir in 2011 if mitigating road improvements are not put in place to attempt to address the congestion, the commuting wait period on I-95 is expected to lengthen by 30 minutes to 1 hour.

Also, The DEIS does not propose a long-term investment strategy to fund any transportation improvements necessitated by the proposed land use changes. Funding is not available through the Commonwealth's transportation budget to underwrite the cost of these unidentified needs.

Specific DEIS Comments:

1. The alternatives need to be more clearly differentiated from each other. The discussion on the impacts of the alternative components seems to be the same other than the cost. The cost items could be broken down to identify the differences and should qualify whether or not they were done assuming 2007 dollars. Costs should identify whether or not all aspects of project development were included, such as preliminary engineering, right of way, construction and administration as well as escalation for inflation to accommodate the schedules for development. Impact, Cost, and Mitigation matrices should help explain the differences between the Preferred Alternative, the Town Center

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Alternative , City Center Alternative, the Satellite Campuses Alternative and the No Action Alternative for the following components:

- a. Land Use
 - b. Transportation
 - c. Air Quality
 - d. Noise
 - e. Topography, Geology and Soils
 - f. Water Resources
 - g. Biological Resources
 - h. Cultural Resources
 - i. Socioeconomics
 - j. Aesthetics and Visual Resources
 - k. Utilities
 - l. Hazardous and Toxic Materials
 - m. Unavoidable Adverse Environmental Impacts
2. The narrative should revolve around the above matrices to make the discussion easy to follow and to avoid repetition of passages verbatim as currently found in the Draft EIS. Similar passages are presented over and over again in the document, making it hard to read and understand because the "flow" was difficult to assess. It is currently difficult to judge the differences between the impacts of each alternative component because the terminology used cannot be quantified.
 3. Discussion should refer to figures, tables, or charts to make each point easier to follow and to make the thought less abstract.
 4. Referencing page 4-19 of the document, section 4.2.2.3, some additional discussion of the overall affects of the timing of completion of the Fairfax County Parkway might be necessary.
 5. 2011 is used as the baseline analysis year. With respect to the baseline year, does this assume that for the candidate build alternatives, the Department of the Army is confirming that no additional internal land use changes made beyond 2011 will have consequential affects on the local or regional transportation network?
 6. For each of the candidate build alternatives, it would be helpful if the discussion of transportation and roadway projects required for mitigation of the affects of implementing the alternative also made clear whether or not the individual projects were already a part of an officially adopted transportation plan or improvement program, state or local.
 7. The regional effects of this "shift" in employment base to Fort Belvoir and the EPG should also qualitatively consider the re-occupation of sites

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previously used by the employment base and the potential impact to the regional transportation system.

8. More discussion should be forthcoming from the Department of Army regarding the details of security inspections at the entrance gates of the facilities in question and their potential impact to queues on components of the local network. The impact of security checks on queuing, and proposed mitigation measures, could be addressed in more detail to provide more assurance that such required checks will not impact mainline traffic.

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9. There are a number of regionally significant road improvements planned in and around Ft. Belvoir that need to be included in the air analyses in the Draft EIS. The CO microscale analysis and the General Conformity Determination (GCD) both need to address the effect of these anticipated road improvements on vehicle miles traveled and air pollutant emissions in the vicinity of Ft. Belvoir. In addition, the anticipated road improvements must meet all applicable project-level and regional transportation conformity requirements.

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10. The General Conformity Determination incorrectly assumes that the construction emissions are already accounted for in the inventories for the 1-hour ozone attainment demonstration SIP, based on the belief that they represent a small percentage of the regional projections. As shown in Table 4.4-6, 368 tons per year of NOx emissions (in 2010) is not insignificant and therefore should not be assumed to be accounted for in the 1-hour ozone SIP. In addition, these emissions should not be assumed to be accounted for in the 8-hour ozone SIP that was recently approved by the Metropolitan Washington Air Quality Committee and is currently under public review. Page 3-2 of GCD states "guidance issued by EPA states that if emissions are not readily identifiable in a SIP inventory, the federal agency should coordinate with the state to determine what portion of a category, if any, could or would be allocated to any given project," however this guidance was not followed. The Metropolitan Washington Council of Governments (MWCOG) can provide the amount of construction emissions that were allocated to Fairfax County in both the 1-hour and 8-hour ozone SIPs, and this total can be further scaled down to represent those allocated specifically to Ft. Belvoir by comparing the anticipated employment levels at the Fort compared to the county total, similar to that done in a recent general conformity determination prepared for Dulles Airport.

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11. The anticipated 200 tons per year of VOC emissions in 2010 from architectural coatings needs to be compared to that allocated for architectural coatings at the Fort in both the 1-hour and 8-hour SIPs. MWCOG can provide the architectural coating amounts that were allocated to Fairfax County in both the 1-hour and 8-hour ozone SIPs,

and these estimates should be appropriately scaled down to represent those allocated specifically at the Fort, such as by employment or population. The GCD incorrectly compares the project-related VOC emissions to the entire region wide (including DC and MD) 2005 and 2008 area source emission inventories to conclude that it is a small percentage of regional projections and therefore accounted for in the SIP.

12. The DEIS states that the realignment would decrease both the number of vehicles and subsequently the total vehicle miles traveled within the region. This conclusion seems unlikely considering an additional 22,000 jobs will be moving into the area, and approximately 15 new road improvements have been proposed to accommodate the additional traffic. The effect of this BRAC action and all anticipated road improvements on motor vehicle usage should be better documented through travel demand modeling.

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13. Page 4-139 – the OTR consists of 12 states and Washington, DC, not 22.

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14. Attachment 1, Emission Calculations, Tables A1-1 thru A1-7 – These tables should indicate the calendar year or years that the projected emissions will occur for each line item. In addition, all Worker Vehicle Emissions should include documentation indicating the speed that the mobile source emissions factors represent.

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15. Appendix E.2, Vehicle Microscale CO Concentration Modeling – Indicate the calendar year or years that the CO microscale analysis represents, as the year of expected peak emissions is required to be analyzed.

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16. Although funding is alluded to through the Defense Access Road program to “the extent allowed by law”, for accuracy and integrity the restrictive limitations of that funding should be clearly explained so as not to give the impression that the 15 mitigation projects can be built with Army funds. The source of funding for mitigation is an issue in the DEIS and needs to be addressed.

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17. In the introduction, “affected jurisdictions” should include more than just Fairfax County. Federal agency offices will be leaving Arlington and other areas to move into Ft. Belvoir; Figure 1-3 shows the extent of the region of influence for this project.

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18. On page ES-4, to provide decision-makers a more complete estimate of the BRAC impacts, an estimated construction cost needs to be provided here for the “20 separate projects” mentioned, or at least refer the reader to the section in the DEIS where they are provided.

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19. On page ES-2, when reading this paragraph, one gets the impression that employees represent the additional traffic added to the network. Does this DEIS account for all additional trips generated as a result of the proposed development? An example on page ES-3 is with the 2,069 medical personnel. If they work at the proposed new hospital a total of 9,800 trips will be generated based on ITE TRIP Generation Manual. This needs to be clarified.

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20. On page ES-8 (ES.6.2), for both accuracy and integrity, it should be made clear that "the developer" in this case is the Federal government.

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21. On page ES-9 (ES.6.3), some explanation is needed to clarify the statement that regional VMT will decrease. Unless some data is provided at a macro level to show that increased commuting distances for personnel formerly commuting to locations in the District of Columbia or Maryland suburbs are balanced by shorter commuting distances for personnel residing south of the installation, it is an intellectual stretch to accept no overall change in VMT.

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22. On page ES-16, by the same logic, the Federal Government (as the developer of the on-post changes that will impact traffic on adjacent public roads) should be responsible for mitigating these impacts.

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23. On page ES-20 (ES.8.1), if a 10% mode split reduces cars entering the installation by 725, the implication is that there are still over 6,000 cars entering that will presumably have to be cleared through some form of security check. The plan for quickly conducting such security checks, so that the entering cars do not back up onto mainline traffic, should be summarized here for reader understanding.

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24. On page 2-4, Table 2-1 will be clearer if like categories are listed in the same horizontal row (e.g., Training opposite Training, etc.).

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25. On page 2-12, (2.2.2.3), first paragraph, first sentence should indicate 6.2 million square feet.....

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26. On page 4-33 (4.3.1.2), we take issue with the statement "the analysis completed.....use the year 2011 as the baseline analysis year, as that is the requirement of the reviewing transportation agencies". VDOT uses a design year that is 22 years past the start of construction on proposed roadway improvements. Therefore, similar to the analysis provided for the recent Fort Lee BRAC EIS, we request transportation analyses be provided to determine the long term (2030) impact of the land use alternatives.

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- 27. On page 4-33 (4.3.1.3), we take issue with the statement "the interpretation and use of the modeling results is solely the responsibility of the EIS preparers." If VDOT is asked to accept maintenance responsibilities for any of the proposed road improvements in the DEIS we must approve of the methodology, assumptions and results of the modeling analysis.

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- 28. On page 4-40 (4.3.2.3.1), what impact will additional ridership on Metrorail and VRE operations? Do these transit systems, stations and parking facilities have excess capacity to handle the increased ridership expected to be generated by the chosen land use alternative?

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- 29. On page 4-46, a comparison of AM and PM travel time contours clearly shows longer commutes in the PM which are likely to worsen with the additional volume generated by the BRAC land use decision.

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- 30. On page 4-47, the TransAction 2030 Plan is a product of the Northern Virginia Transportation **Authority (NVTA)**, not the NVTC (an entity located in Arlington which deals chiefly with transit matters).

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- 31. On page 4-49, while the theory and information presented are useful when considering the macro effects of the BRAC movement, a more useful discussion would involve identifying the effects on roads in the vicinity of Ft. Belvoir of 22,000 new workers arriving and departing during the peak hours. Such concentrated impacts can not be swept aside by considering impacts on a regional or Fairfax-wide level. A discussion of the effects on the roads in the vicinity of Ft. Belvoir should be included in any future environmental documents, supplemental or final.

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- 32. On page 4-50, for clarity, the sources should be cited for the volumes offered in Table 4.3-4 and the corresponding LOS.

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- 33. On page 4-50, we take issue with the statement the I-95 4th lane improvement "is not expected to alleviate congestion along I-95....." The widening of I-95 will reduce congestion, improve safety and shorten the length of the peak period in comparison to not widening I-95.

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- 34. On page 4-52, the second full paragraph duplicates the content of the first.

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- 35. On page 4-53 (Figure 4.3-11), what peak hour is this referring to?

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- 36. On page 4-55, much of the information in this paragraph does not seem germane to the impact of the BRAC action. While comparison of Fort Belvoir to other development may have some utility, it is only relevant if

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the other development has similar access characteristics to Fort Belvoir – limited access points, limited transit service, adjacent roadways that are already congested and are physically (not to mention financially) difficult to improve, and limited options for effective mitigation.

37. On page 4-60 (Table 4.3-9), U.S. Route 1/Neabsco Creek Bridge project is planned to be under construction in 2007 and therefore is in the TIP/CLRP.

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38. On page 4-63 (4.3.3.3), since a third track is not currently funded for construction, especially within the 2011 planning horizon used in the DEIS, any discussion of it in the DEIS gives the false impression that it will help mitigate the impacts of the BRAC decision. This should be removed or clarified appropriately.

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39. On page 4-66 & 4-67, the reason to include statewide and regional population numbers in these tables (and similar tables for other alternatives) is not clear as this information is not germane. At the micro level, the increase of 22,000 people on Fort Belvoir does have significant transportation impacts on the roads in the immediate vicinity of the installation. We disagree with the premise that traffic volumes on roadways surrounding Ft. Belvoir would naturally occur under the No Action since there is no guarantee where future development will occur within the Washington Metropolitan Region.

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40. On page 4-69, recommend clarifying the “completion” date (open to traffic, total project closeout, some other meaning?) for the Wilson Bridge project. The project website indicates that the second span will be open to traffic in 2008.

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41. On page 4-79, a consideration mentioned, but admittedly difficult to address in much detail, is the additional impact on congestion caused by consultants and others who do business with agencies to be located on the installation. The additional vehicles on the system from these employees could lower the LOS and makes the importance of mitigating measures even greater.

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42. On page 4-83, it should be clarified that the 2,000 – 3,000 vph available capacity and the resultant hours of queuing refer only to the roadway capacity – from Table 4.3-6 it is clear that security processing for that number of vehicles may extend the queuing for an even longer time. This should be clarified.

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43. On page 4-85, the “rideshare facility” needs to be described more fully, even if only conceptually. Is this a parking lot and if so, how many spaces? Where is it located and how will it be accessed? How many

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security gates will process vehicles going to the facility in the morning commuter arrival periods? Is a bus terminal or transfer station envisioned?

44. On page 4-85, there needs to be clarification whether this "additional EPG access" refers to additional highway entrances to EPG, additional security gates, or both.

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45. On page 4-85 and all other sections devoted to listing transportation mitigations, specific improvements should be identified. Currently, the DEIS lists general improvements such as "Fairfax County Parkway Improvements between I-95 and Kingman Road". What are the specific improvements to the Fairfax County Parkway needed to mitigate the impact of the BRAC development? There are other examples on these lists where more specific mitigation strategies should be identified.

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46. On page 4-85 and all other sections devoted to listing transportation mitigations, specific improvements to the ramp servicing traffic from northbound I-95 to westbound Fairfax County Parkway are not mentioned even though the development of EPG greatly impacts this ramp.

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47. On page 4-85 and all other sections devoted to listing transportation mitigations, specific improvements to the Fairfax County Parkway/Franconia Springfield interchange are not mentioned even though the development of EPG greatly impacts this interchange.

48. On page 4-86, clarify whether the order-of-magnitude costs include a factor for right-of-way acquisition or the assumption that none is needed and a factor for utility relocation (typically a significant percentage of the overall project cost in northern Virginia).

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49. On page 4-88, greatly expanded transit service should be considered among mitigation options. With a major transit center (Franconia-Springfield, with both Metrorail and VRE service) about 1 mile from the EPG site, a much more extensive shuttle service from the center to EPG should be considered in order to help achieve a mode share greater than 10%. If the security check is performed at the transit center and designated commuter parking lots during the AM peak period, access time at EPG will be reduced. As indicated (page 4-89), shuttle bus service compares very favorably, in financial terms, with other mitigation options. In view of the cost, and project implementation lead time, for improving the affected highway network it may be useful for the Federal Government to consider increasing its monthly subsidy payment for those BRAC employees who use public transportation, at least on a temporary basis.

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- 50. On page 4-89, the TDMC section is insufficient. An effective TDM component is critical to the success of the transportation system in the area. Goals need to be established for reductions to single occupancy vehicle use. Telework, carpooling, vanpooling, bus VRE and Metrorail use need to be optimized. Improvements/increases to park and ride and transit transfer facilities need to be specifically identified and funded. A reduced parking ratio and/or parking charges should be analyzed. The Army should consider providing a significant contribution toward a VDOT regional TMP that is currently under consideration for all "MEGA" projects in Northern Virginia that are nearing construction.
- 51. On page 4-89, please provide details on how the cost estimates for the transit related mitigations actions were derived. Did area transit providers participate in reviewing these estimates?
- 52. On page 4-92, was the time for security processing of commuter buses examined or estimated in order to gauge whether this impact creates significant delays or queues on access roads? 350 riders (5% mode share) equates to about 9 buses in the peak period.
- 53. On page 4-134, even assuming a 33% mode shift to transit or carpools, 18,000 new employees at EPG translates to at least 12,000 vehicles desiring to enter the site, probably during a 1 or 2-hour period. What is the estimated time it will take to clear these vehicles into the outer perimeter, either using tag-reading equipment or personnel viewing a decal on the vehicle? What length queue will this clearance generate? Will commuter buses have a significant impact on this?
- 54. No transportation related improvements are indicated; therefore each proposed improvement will need to address traffic noise.
- 55. In Section 4.5.1.4, all noise sensitive land uses should be addressed.
- 56. In Section 4.5.1.4, it isn't clear whether air traffic will increase?
- 57. In Section 4.5.1.4, were existing and future noise exposure maps generated?
- 58. Tables 4.5-4 through 4.5-10, should refer to whole numbers per FHWA recommendation as this can prevent a false sense of accuracy. In other words, NSR 8 would approach or exceed the NAC (approach is defined to be within 1 dBA of the NAC, therefore 66 dBA is considered an impact) and would be considered an impacted NSR.

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59. The document provides conclusions regarding the cost burden for contaminated site "*corrective action*" for each alternative (see Section 4.13.7) but these conclusions are not substantially supported elsewhere in the document. Moreover, "*pre-development preparations requirements*" (i.e. contaminated sites investigation, remediation and/or closure) are stated to not be part of the proposed action. Clearly, the presence of these sites and the lack of adequate characterization are critical to the proposed action as these sites could severely limit the ability (both in terms of schedule and cost impacts) of the Fort to meet its commitments under BRAC.

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60. BRAC also requires the development of a comprehensive funding strategy and establishes a schedule to implement the relocation-related activities. If current funding channels are expected to be part of the overall BRAC funding strategy for addressing the noted hazardous substances/hazardous materials issues, then the Fort could well experience the same "*sporadic*" funding and resultant "*intermittent*" corrective action measures plaguing historical progress for these areas (as highlighted on page 4-421).

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61. Experience with clearing Solid Waste Management Units (SWMUs) (as well as currently undiscovered contamination sites) for the right-of-way for Fairfax County Parkway have demonstrated the potential significance of delays to schedule and project costs. To highlight such delays, in July 1997 VDOT received written assurances from the Fort that SWMUs on the portion of the EPG required for the Fairfax County Parkway would be remediate and that a "*clean [construction] site*" would be provided to VDOT. At that point, it was stated that the Fort had conducted "*years*" of "*extensive environmental evaluation*" of the EPG and was continuing to remediate remaining SWMUs. To date, such actions have not been completed and the property is currently not suitable for use. Moreover, during the course of the environmental studies, a previously undiscovered contamination area (Former Aboveground Tank Test Site) is now projected to require the remediation of 40,000 yard³ of contaminated soils and has created off-site disposal capacity issues that are requiring on-site staging of material. Merely addressing the contamination sites to support the (transfer and) use of only a portion of the EPG has taken well over 10 years. The implications to the feasibility of meeting the BRAC schedule and budget are obvious and should be considered.

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62. The DEIS indicates that munitions and explosives of concern (MEC) will be addressed under the Military Munitions Response Program (MMRP), however the program is described as "*in its infancy*" and that cleanup thresholds are still being developed. Without an understanding of the cleanup requirements for MEC it is difficult to determine the feasibility of

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land use decisions where such ordinance is suspected or known to be present.

63. Cleanup to date at the EPG of munitions and MEC in the proposed footprint for the Fairfax County Parkway has been to a depth of 2 feet and deeper only if needed on a spot by spot basis. Yet, it is VDOT's understanding that EFLHD is demanding a 10 foot depth removal of soil for construction of the Woodlawn Beulah replacement road on its portion of the EPG. If EFLHD determines that this construction method is appropriate for the Fairfax County Parkway as well, it may affect land use decisions as well.

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64. Many contaminated areas that have received a regulatory closure received such closure based on risk-exposure scenarios for current land use. Those land-use scenarios will clearly change under BRAC. Therefore, re-evaluation of risk will be likely required and potentially require additional remediation for areas that were previously "closed." While this issue is mentioned in the document, there should be a discussion of which "closed" areas will require such re-evaluation.

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65. The document identified thirteen projects for mitigating adverse effects to the roadway impacts associated with the preferred alternative, whereas, the Secretary's comments in newspaper article "2011 BRAC deadline tenuous" dated March 14, 2007 indicated fourteen projects. Are there thirteen or fourteen projects?

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66. The document recognizes the fact that there are no plans for additional capacity in the corridor beyond the planned widening and I-95 HOT lanes; however, it didn't offer mitigation for the congestion due the additional travel demand from the south due to relocation of 22,000 jobs.

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67. The order of magnitude estimate varies from -25% to +75%. The estimated cost of all thirteen projects appears to be low and should be verified. Furthermore, it's not clear whether the construction phasing and traffic impacts during the construction were considered in developing the estimates. This should be clarified as it can significantly impact the cost associated with pertinent alternatives and may result in selection of a different alternative.

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68. Project #3 EPG segment of Fairfax County Parkway is recommended to be widened from four to six lanes. The original plans included six lane facilities except at the Rolling Road, EPG, and Fullerton Road interchanges due to lane drops for the ramps; however, the proposed widening should include six through lanes in addition to the necessary acceleration and deceleration lanes from ramps.

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69. The estimated costs for transportation mitigation vary by up to \$742 million depending on which alternative is selected. What method was used to determine if proposed mitigation is adequate to relieve the transportation impacts?

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70. Commitments to fund necessary transportation improvements should be identified. Who will be responsible? What types of mechanisms are anticipated to fund the improvements? Is the Army willing to pursue the funding options needed to address the transportation impacts?

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71. The DEIS fails to address potential impacts on surrounding communities especially the impacts associated with off-post, mitigative transportation improvements. The DEIS should discuss the various types of impacts on the surrounding communities, including but not limited to: 1) impacts to communities at the points of ingress/egress to the development (increased traffic volumes, reduced quality of life, forced division within established communities, access changes); and 2) impacts on the communities directly adjacent to the development. Alternative land use plans should address the differences in the impacts on these same communities.

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72. The report failed to address the types of surrounding communities as far as race, national origin and income level.

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73. The DEIS does not consider the implementation of transportation system management and operations strategies that can be used to better manage and operate the transportation network under congested conditions and to mitigate non-recurring congestion caused by such events as accidents or special events. Strategies such as CCTV can also increase security and safety on roads surrounding Fort Belvoir and EPG.

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74. Transportation system management and operations congestion mitigation strategies should be listed as a transportation mitigation measures for each land use alternative.

75. Although the report assumes the same number of commute trips with and without the BRAC implementation, there is no discussion on the before and after modes of travel of the 22,000 workers. Many of these person trips are accommodated today by transit and HOV (before condition) but will choose to commute as SOV's to Ft. Belvoir and EPG, causing an increase in vehicle trips in the region and the corridor. More discussions should take place regarding the use of transit by existing employees based upon surveys that were performed as part of the EIS.

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- 76. There is little to no discussion on carpooling /vanpooling to Ft. Belvoir and EPG. A ridesharing facility is recommended but there are no details provided on what it would consist of. There are no forecasts of HOV usage which should be available as a travel forecasting model output.
- 77. There is no discussion regarding the impact on existing and future commuter parking lots along the I-95 corridor. The BRAC action will increase the formation of car and van pools originating to the south and thus increase the demand for commuter parking. An inventory of available commuter lot capacity along the I-95 corridor should be included as well as a forecasts of the increased demand caused by the BRAC action.
- 78. Did the travel forecasting model consider the National Museum of the U.S. Army? If so, where was it located and how much traffic does it generate?
- 79. What is the official study area of the DEIS? A clear and concise map should be included that outlines the study area. We suggest the detailed study include roadways and intersections with more than 10% of the total traffic due to the BRAC action.
- 80. The report should address what transportation improvements can be feasibly constructed by September 2011. Based upon the magnitude of the proposed transportation mitigation actions listed in the DEIS, it is extremely doubtful all improvements will be operational by 2011. Additional studies should be performed to determine the appropriate amount of land use that can be accommodated by those transportation improvements that can be practically built by 2011. Land use phasing plans should be developed based upon these analyses.
- 81. Attached to these comments and for the official DEIS record is an independent transportation analysis dated April 25, 2007 of the preferred land use alternative performed by Parsons Brinkerhoff. The Army should consider and incorporate into the FEIS the results and recommendations of this analysis.
- 82. The environmental and traffic impacts of constructing 6 million square feet of building space and 7 million square feet of parking structures on the existing roadway network was not provided. Details of the location of construction entrances, the number of construction workers and the amount and types of construction materials delivered to the site was not included. The negative impacts of construction to commuters and the surrounding neighborhoods over the next three to four years will be tremendous.

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- 83. Please provide level of service, volume/capacity ratios, traffic volumes and delay calculations for each link and intersection in the study area. These should be provided for each land use scenario under the build and no build scenarios. 54.86
- 84. Graphics that clearly display the proposed transportation mitigation strategies should be provided in the EIS. 54.87
- 85. Please explain the reasoning behind the statement on page ES-9 for why the BRAC action would decrease both the number of vehicles and the total vehicle miles traveled in the region due to a net reduction of 1700 personnel? Wouldn't other personnel be moving into the region by 2011 and occupying the facilities vacated by BRAC personnel? Please explain this. 54.88
- 86. Page ES-8 states that any significant traffic effects as a result of the BRAC action should be mitigated with transportation improvements – why aren't they suggested by the Army in this document since the adverse effects are documented in this DEIS? 54.89
- 87. Were all 4 alternatives compared for hazardous materials and MEC cleanup expenses? Why does the DEIS say that the City Center alternative is the most expensive and the Preferred Alternative is the least expensive when the other 2 alternative don't use EPG land at all? 54.90
- 88. Why were the hazardous substance and materials cleanups on the EPG in section ES.6.12 NOT included as part of the proposed action? The cleanup of the portion of the EPG that is NOT being used for the Fairfax County Parkway was not being cleaned up to our knowledge for any purpose other than now for BRAC so why is it not included as part of this action? 54.91
- 89. Since the Army is the developer of the EPG, why shouldn't it be responsible for the highway improvements necessary for that development? The DEIS does not address that issue or the mitigation of that impact. 54.92
- 90. In section ES.8.1 it states, "Mitigation for impacts to the **transportation system** could occur with respect to off-post transportation improvements and mass transit expansion." Emphasis added. What is the definition of the transportation system being referred to here? 54.93
- 91. In section 4.3.1.2 on page 4-33, does the last sentence in the center paragraph mean that the Army is willing to provide mitigation when it states "The BRAC action would require mitigation strategies to ensure that the impacts due to the BRAC action are mitigated, so that the 54.94

roadway improvements would provide at least the same level of operation, if not better, than the conditions expected if the BRAC action did not occur.”?

92. Since the BRAC action will significantly impact traffic on I-95, please include external trips that pass through the study area in Table 4.3-3 on page 4-50. This is a significant impact and should have been included.

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93. Please include tables in the FEIS that clearly outlines specific transportation improvements for each land use alternative necessary to mitigate the impact of the BRAC action along with the detailed cost, the responsible implementing agency and the funding source.

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94. The Army should strive to maximize the use of transit and HOV facilities as part of this project.

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95. The DEIS provides no financial commitments towards upgrading or providing the necessary transit systems necessary to mitigate the impacts of land use alternatives.

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96. Transit improvements need to be specifically addressed. Start-up and operational costs of transit improvements need to be funded. Shuttle services to and from transit (Springfield Metrorail, VRE, etc.) need to be funded. The Army should also consider funding additional transit to reduce bus headways and increase bus ridership. A base circulator should be considered in order to reduce the need for personal vehicles while on base.

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97. Bicycle and pedestrian improvements need to be identified.

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98. The ROD should include a timeline for the proposed transportation improvements.

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99. Attached, please find Secretary Pierce Homer testimony that was provided at the April 17, 2007 public hearing.



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Memorandum

April 25, 2007

To: Tom Fahrney
Virginia Department of Transportation
14685 Avion Parkway
Chantilly, Virginia 20151-1104

From: Todd Peterson

Re: Fort Belvoir BRAC Realignment
Review of transportation impacts in response to EIS (DRAFT)

Executive Summary

This memorandum summarizes our review of the EIS for base realignment at Fort Belvoir in Fairfax County, Virginia. The EIS proposes certain improvements to the transportation infrastructure to accommodate the addition of approximately 22,000 jobs to the base by the year 2011.

In summary, the following conclusions address our key concerns regarding the evaluation of transportation impacts as presented in the EIS:

- Projected increases in traffic volumes associated with the 2011 Build conditions are inconsistent with the number of jobs (22,000) being relocated to Fort Belvoir.
- Transportation demand models are based on a capacity-constrained network, a suspected cause of underestimating future traffic volumes.
- It is anticipated that the impacts of the proposed development will extend much further to the south than reported in the EIS.
- Specific items proposed for mitigation of traffic impacts are localized to the immediate vicinity of the Fort Belvoir Main Post and the EPG, and cannot mitigate upstream/downstream impacts.
- Statements in the EIS relating to the extent, scope, and effectiveness of proposed mitigation are vague and in some cases unsupported by the available data.
- None of the proposed mitigation measures is supported by a direct analysis of improved traffic operations under 2011 Build conditions.
- In many cases, reported intersection Level of Service (LOS) is worse under the 2011 Build condition than it is under the 2011 No-Build condition.

Background

In 2005, Congress enacted legislation to implement the recommendations of the Defense Base Realignment and Closure Commission (BRAC Commission), which includes substantial changes to present-day operations at Fort Belvoir in southeast Fairfax County, Virginia. An Environmental Impact Statement (EIS)¹ prepared by the Army addresses impacts associated with several scenarios, including the

¹ *Draft Environmental Impact Statement for Implementation of 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia*, U.S. Army Corps of Engineers, Mobile District, March 2007.

“Preferred Alternative” which is currently proposed as the land use plan for the base. The Preferred Alternative will result in an additional 22,000 jobs in Fort Belvoir [1, Table 2-2], the majority (76%) of which will be allocated to the Engineer Proving Grounds (EPG), an 807-acre parcel bounded by the Franconia-Springfield Parkway to the north, Backlick Road and I-95 to the east, and the future extension of the Fairfax County Parkway to the southwest. The remaining additional personnel will be allocated to the Main Post to the southeast, which is centered on the intersection of Route 1 and the eastern terminus of the Fairfax County Parkway.

This review has been performed at VDOT’s request to validate the EIS with respect to mitigation of impacts on the local transportation infrastructure. This review includes a critical evaluation of the supporting analysis upon which the EIS’ recommendations are founded, including the travel demand forecasting, capacity analysis, and the resultant findings as published in the EIS. Finally, this review addresses specific questions intended for VDOT’s use in preparing a responding to the EIS during the open comment period.

Evaluation of EIS Transportation Analysis

PB obtained copies of the working data used for supporting analysis of transportation impacts and improvements for the EIS, including the travel demand forecasting models (TP+ format), intersection models (Synchro format) and several diagrams and working documents not published in the EIS.

- **Transportation Planning Models**

Travel demand forecasting for the Fort Belvoir EIS was developed using an adaptation of the Metropolitan Washington Council of Governments (MWCOC) regional transportation planning model, which itself is developed using TP+, a proprietary software environment designed for modeling transportation demand based on land use using the four-step planning process. The models themselves contain a schematic representation of the entire region served by the MWCOC, of which the region surrounding Fort Belvoir is a small part.

For the Fort Belvoir EIS, several models were developed pertaining to the analysis scenarios under consideration using customized trip tables based on projected employment and population changes associated with the base realignment. This review focused on the models provided for the 2006 (Existing), 2011 No Build (No-Action), and 2011 Build (Preferred Alternative) conditions. Additional models of the other “Build” alternatives, as well as 2030 long-range forecasts were obtained as well but were not addressed in this review.

These models were reviewed with the dual intention of validating the models themselves and obtaining traffic volumes for a parallel analysis of transportation impacts associated with the 2011 Build conditions. Relevant information in these planning models was obtained from the raw output data included with the submitted models, from which the following information could be directly extracted:

- Link volumes; links defined by the “nodes” between which travel is allowed.
- Turn volumes; movements between various links at nodal intersection.
- Network diagrams; verification of the schematic transportation network upon which forecast traffic demand is “loaded” in the process of running the model.

The following observations resulted from examination of the planning models:

General

1. Travel demand forecasts in the TP+ models are based on the volumes occurring during the three-hour peak periods in the AM and PM, and the remaining 18 hours under off-peak (“OP”) conditions. In accordance with the MWCOG procedures for post-processing the output of the demand models, peak hour volumes can be obtained from the peak period volumes based on the peak hour volumes being 40% and 37% of the 3-hour AM and PM peak periods, respectively.

Existing (2006) Model

2. The 2006 model includes a number of links that do not correlate with the existing transportation network. Specifically, the model provides links representing direct access to Franconia-Springfield Parkway (FSP) from the NB and SB general-purpose (GP) lanes on I-95. Currently, access to FSP is only provided from the I-95 HOV lanes. Additionally, the model includes links representing direct access between Route 123 and the I-95 HOV lanes to the south. Currently, access to the I-95 HOV lanes from Route 123 is only possible to the north (i.e. Route 123 traffic may enter the northbound HOV lanes in the AM peak period, and southbound HOV traffic may exit to Route 123 in the PM peak period, but not vice-versa).
3. There are significant disparities in the link volumes reported by the 2006 model and recent ADMS counts, including but not limited to the locations presented in Table 1 (attached). In addition to highlighting locations where the 2006 model is inconsistent with current traffic counts, it identifies locations where forecast volumes inexplicably drop between 2011 No-Build and 2011 Build conditions.

Future (2011 No-Build and 2011 Build) Models

4. Approximately 52% of Fort Belvoir employees live south of the Occoquan River [1, Table 4.3-6]. Fort Belvoir realignment will result in increase of 22,000 jobs in Fort Belvoir [1, Table 2-2], the majority (76%) occurring at the EPG. Based on this, one should expect an increase of roughly 10,000 work-based trips entering the EPG from the south during the AM peak period and exiting southbound during the PM peak period. The results from the 2011 No-Build and 2011 Build demand models which indicate increases of approximately 600 vph in these areas, are not consistent with these increased demand patterns. Figure 1 demonstrates this, in which the link volumes from the 2011 No-Build and 2011 Build planning models for the I-95 / Fairfax County Parkway interchange have been marked in hand. Figure
5. The 2011 No-Build and 2011 Build models both include links providing access between Route 123 and the I-95 HOV lanes to the south, as noted above. Such access does not currently exist nor is it proposed in the long-range plan or as a mitigation for this project.
6. One of the proposed mitigations involves improving Fairfax County Parkway between John J. Klingman Road (at the existing intersection with Rolling Road and the Franconia-Springfield Parkway) and I-95 as a 3-2-3 lane corridor. The 2011 Build model shows the extension of the Parkway as a 6 lane (3-3) only.
7. Neither the 2011 No-Build nor the 2011 Build models contain a centroid for the development north of Franconia-Springfield Parkway in the vicinity of the Spring Valley Dr. intersection. There is significant residential development in this area including a retirement community. Correspondingly, turning movements generated by the travel demand model do not reflect the presence of a northbound leg.

8. The ramp from I-95 HOV lanes to I-95 NB north of the Fairfax County Parkway interchange is not assigned any southbound volumes in the PM peak period, despite the fact that it is proposed to be reconfigured as a reversible ramp serving southbound entries from the EPG in the PM peak period.

These noted observations only address issues that were encountered during review and are not a comprehensive list of all issues related to the travel demand models. The effects of these issues on the validity of travel demand forecast volumes are currently undetermined, however they should be a cause for further investigation into the structure and operation of the models themselves. Further observations will be noted as they are encountered during further review of these models.

- Synchro Models

The majority of evaluation of transportation improvements as presented in the EIS are based on the results of Synchro analysis of key intersections. The geographic scope of the Synchro analysis is limited to the surface street intersections in the immediate vicinity of the Fort Belvoir Main Post and EPG.

The following observations resulted from examination of the Synchro models:

1. The models exclude certain key intersections, such as the signalized intersection of the Fairfax County Parkway / NB exit ramp / Loisdale Road. This intersection is critical since it potentially serves overflow for the I-95 NB to FAIRFAX COUNTY PARKWAY NB movement when the loop ramp demand exceeds capacity.
2. The turning movement volumes in the Synchro models vary substantially from the turning movement volumes generated by the planning models. The process for obtaining turning movement volumes for analysis was based on a factoring and smoothing process in accordance with the NCHRP 255 method for developing turning movement forecasts from computerized trip assignment data. Generally, we are in concurrence with this methodology although we have been unable to correlate the "seed" approach link volumes to the source volumes from the planning models. Figures 3a and 3b demonstrate an attempt to track the development of 2011 Build volumes at the US 1 / Telegraph Road intersection. Figure 3a demonstrates the representation of this intersection in the TP+ model, where it is analyzed as a 3-leg "T" intersection. Figure 3b is an attempt to cross reference seed volumes to turning movements generated by the planning model. In addition to the volumes failing to check, the "smoothed" intersection is given an additional southern leg not present in the planning model. Similar difficulties were encountered during attempts to validate the seeding process for other intersections as well.
3. Resultant analysis of intersection Level of Service (LOS) for the 2011 Build network indicates that several intersections exceed available capacity, particularly along the Franconia-Springfield Parkway and Route 1 corridors.
4. Several intersections suffer a reduction in Level of Service under 2011 Build conditions. A list of these intersections is attached as Table 2.
5. Several critical intersections are omitted from the 2011 Build models, including (but not limited to) the proposed interchange of Neuman Road and the Franconia-Springfield Parkway, the intersection of the Fairfax County Parkway, I-95 ramps, and Loisdale Road, and signals at proposed access points to the EPG such as the intersection proposed for the flyover ramp from I-95 HOV to I-95 GP.

- Additional Information



PB obtained additional information related to the evaluation of the Fort Belvoir realignment not published in the EIS. These include the following:

- Spreadsheets documenting the refinement of turning movement forecasts.
- Maps of peak hour traffic volume ranges for 2011 Build “constrained” and “unconstrained” conditions focusing on the Fairfax County Parkway corridor between Rolling Road and I-95. These are also attached as Figures 1 and 2.
- Spreadsheets of screenline volumes at key points.

The following observations resulted from examination of these additional materials, and confirmed the noted observations that arose during review of the TP+ and Synchro models:

1. During review of the procedures used for smoothing the turning movement volumes, it was unconfirmed whether the source of “seed” link volumes was the planning model or some other source, since the seed volumes did not match volumes from the planning model.
2. There is a significant difference between “unconstrained” and “constrained” traffic volumes.
3. Further evaluation is necessary to determine if screenline volumes are consistent with the number of jobs (attractions) being added to the Fort Belvoir complex.

Comments in response to the EIS

Based on this review, several questions exist with respect to how transportation impacts have been addressed in the EIS:

1. Transportation impacts at Fort Belvoir will have a major impact on the local transportation network. In the EIS, evaluation of these impacts is limited to certain key intersections and does not adequately address corridor impacts along key routes. It is suggested that the existing scope of analysis be expanded to include the following routes within the study area:
 - I-95 from south of Route 123 to the interchange of I-95 / I-395 / I-495 and to the limits of ramp influence areas on these routes.
 - The Fairfax County Parkway from the western terminus of HOV lanes to the eastern terminus at Route 1.
 - Franconia-Springfield Parkway from the Rolling Road / Fairfax County Parkway interchange to the eastern terminus at Route 1.
 - Route 1 from the Route 123 to the intersection with the Franconia-Springfield Parkway.

This analysis should include a comprehensive evaluation of local trip assignments as well as operational issues, including mainline capacity, ramp influence areas, weave / merge areas, and intersection performance. Where the travel demand forecasts indicate demand exceeding roadway capacity, this analysis should address how this demand will be served.

2. There are several locations where the demand associated with the 2011 Preferred Alternative exceeds projected capacity, including proposed mitigation. This is clearly demonstrated in the “Range of Constrained / Unconstrained Volume” figures in which reported peak hour volume ranges along the Fairfax County Parkway corridor vary significantly depending on whether or not the trip assignment associated with expansion of the base is assumed to take place on a constrained or unconstrained network. A key example is at the I-95 / Fairfax County Parkway interchange where projected constrained demand on certain ramp movements exceeds “constrained” demand by approximately 600 vph. Given that the demand will continue to exist

regardless of whether or not the network is constrained, how will this unmet demand be served? Were spillover effects onto other routes quantified based on known capacity limitations of the 2011 No-Build transportation network?

3. Transportation mitigations proposed for the Preferred Alternative outlined in section 4.3.7.4 of the EIS include the following (numbering matches EIS):
- (1) *Reconstruction of the I-95/Fairfax County Parkway Interchange* – includes the addition of direct access ramps between the Parkway and the I-95 HOV lanes to the south.
 - (2) *Fairfax County Parkway Improvements between I-95 and John J. Kingman Road*
 - (3) *Rideshare Facility*
 - (4) *Transit Center/Facilities*
 - (5) *Intersection Improvements*
 - (6) *Additional U.S. Route 1 Crossings for Main Post*
 - (7) *Fairfax County Parkway/John J. Kingman Road Intersection Improvements*
 - (8) *Beulah and Telegraph Roads Improvements.*
 - (9) *Widening of U.S. Route 1 through Fort Belvoir.*
 - (10) *Interchange at U.S. Route 1 and Fairfax County Parkway.*
 - (11) *Interchange at U.S. Route 1 and Telegraph Road.*
 - (12) *Improvements to Lorton Road.*
 - (13) *Franconia-Springfield Parkway/Neuman Street Interchange.*
 - (14) *Completion of Van Dorn Street/Franconia Road Interchange.*

Additionally, the following improvements are shown as improvements directly related to providing enhanced access to the EPG:

- a. At-grade intersection of Barta Road and Backlick Road.
- b. *Extension of Neuman Street to the south, and addition of a grade-separated interchange between Neuman Road / Hampton Creek Way and the Franconia Springfield Parkway.
- c. *Addition of one-way spurs to the EPG circulator extending from the existing slip ramp currently providing access to Backlick Road from southbound I-95.
- d. *Addition of a four lane two-way overpass from the EPG circulator to the existing ramp to the I-95 northbound GP lanes from the northbound HOV lanes.
- e. *Addition of a one-way ramp originating from the exit ramp serving southbound I-95 to northbound Fairfax County Parkway, to a signalized intersection with the EPG circulator.

Questions

- 3.1. In reference to improvement (1), figures showing the 2011 Preferred Alternative seem to show the Parkway interchange in its existing configuration. How is access to the HOV lanes to be provided? Will directional ramps be added to address the

- movements that exceed the reasonable capacity of the existing single-lane cloverleaf loop ramps (i.e. I-95 northbound to FAIRFAX COUNTY PARKWAY northbound)? Depending on how this improved interchange is configured it could have a drastic impact on other proposed improvements including the Fullerton Road interchange and the proposed EPG access ramps.
- 3.2. In reference to improvement (2), see Observation #6 with regard to the planning models. The 2011 Build model only shows a 6-lane configuration. How does the demand pattern shift if the additional 2 median lanes are added?
 - 3.3. In reference to improvement (3), the EIS states that "*A rideshare facility on the Main Post would encourage a shift from SOV to HOV trips. This shift would reduce traffic volumes on the roadway, which, in turn, would reduce the effects of the development*". Where is this mode shift quantified? Where is the supporting documentation for this statement?
 - 3.4. In reference to improvement (4), the scope and influence of the Transit Facility on vehicular trips is unquantified.
 - 3.5. In reference to all other improvements (5) through (14), the exact nature of these measures is undefined in the EIS. Furthermore, these effect of these improvements on traffic operations are not addressed in the Synchro models nor elsewhere in the EIS.
 - 3.6. Improvements **c**, **d**, **e** and **f** noted above are not included on the State's long range plan and, in any case, appear unlikely to be fully designed, permitted, constructed and operational by 2011. How would the omission of these improvements affect the distribution of base-oriented trips? What are the impacts to the local transportation network (in terms of demand volume, v/c ratio, Level of Service, corridor travel time)?
 - 3.7. For improvement **e**, what are the consequences of allowing traffic to make a turn from the ramp onto the overpass to access the EPG? Is there sufficient stopping sight distance along the ramp? Is there sufficient intersection sight distance for drivers entering the ramp from the EPG? Also, the graphics provided indicate that the overpass will provide two lanes eastbound from EPG to the ramp. Since there is only one receiving lane on the ramp, only one eastbound lane is needed on the overpass.
9. Traffic volume projections documented in the "Range of Typical Volumes" figures (not included in the EIS) indicate unconstrained demand greatly exceeding the capacity of the existing interchange. For example, the ramp from I-95 NB to FAIRFAX COUNTY PARKWAY NB shows an AM peak hour volume of 2200-2600 vph for a single lane ramp. Even the "constrained" volumes show an AM peak hour volume as high as 2000 vph for this ramp. Such volumes typically warrant directional ramps in order to serve these volumes at an acceptable level of service. Do interchange ramps (and all associated ramp junctions, merge / weave areas, etc.) provide adequate capacity as proposed for the Preferred Alternative?

Table 1 - Comparison of selected analysis traffic volumes

Location	ADMS Existing ⁽¹⁾	TP+ Model ⁽²⁾ 2006 existing	Increase from 2011 No-Build to 2011 Build	2011 No-Build ⁽³⁾ (No Action)	2011 Build ⁽⁴⁾ (Preferred Alternative)	Increase from 2011 No-Build to 2011 Build
195HOVNB from PWP to Route123	3052	995	(2057)	1072	1138	66
195NB to Lorton Road(east+west)	205	762	557	1720	1674	(46)
Route123 south to 195NB	922	1176	254	1555	1268	(287)
Route123 north to 195NB	965	1595	630	2384	2294	(90)
195NB from PWP to Route123	5741	5686	(55)	6346	6450	104

Notes

- (1) ADMS counts obtained for 3/14/2007 and 3/21/2007
- (2) 2006 Existing network obtained from: 2005\CONF\2005CGV2_1D_50_Sept_05_Conformity\2006\LASTODIREVISED_ODILASTASSIGN\2006_LOADEDHWY.NET
- (3) 2011 No-Build network obtained from: 2005\CONF\2005CGV2_1D_50_Sept_05_Conformity\2006\2011\NBRLASTODI\2011_NB REVISED_ODILASTASSIGN\2011_LOADEDHWY.NET
- (4) 2011 Build network obtained from: 2005\CONF\2005CGV2_1D_50_Sept_05_Conformity\2006\2011PR-Quantico 3000\LASTODIREVISED_OD\FINAL_ODIREV_NETWORK\2011PRO_LOADEDHWY.NET

TABLE 2 - INTERSECTION LOS COMPARISON

LEVEL OF SERVICE(LOS) COMPARISON

NO.	Intersection Name	2011 AM		2011 PM	
		NO ACTION	PREFERRED	NO ACTION	PREFERRED
1	Commerce St./ Amherst Ave.	D	D	D	D
2	Commerce St./ Backlick Rd.	C	C	D	D
3	Backlick Rd./ Calamo St.	B	B	C	C
4	Loisdale Rd./ Spring Mall Dr.	C	C	D	D
5	Franconia Springfield Parkway./ Spring Village Dr.	E		F	F
6	Franconia Springfield Parkway EB Ramp./ Backlick Rd.	E	E	D	D
7	Franconia Springfield Parkway WB Ramp./ Backlick Rd.	B	B	C	C
8	Franconia Springfield Parkway./ I-95 HOV Ramps	E	E	F	F
9	Franconia Springfield Parkway EB Ramp./ Frontier Dr.	C	C	D	
10	Franconia Springfield Parkway WB Ramp./ Frontier Dr.	C		F	F
11	Franconia Springfield Parkway./ Beulah St.	F	F	F	F
12	Fairfax County Parkway./ Terminal Rd.	C	C	B	B
13	Fairfax County Pkwy SB Ramps./ Telegraph Rd.	C	C	C	C
14	Fairfax County Pkwy NB Ramps./ Telegraph Rd.	B	B	C	
15	Fairfax County Parkway./ John J Kingman Rd.	D	D	F	F
16	Telegraph Rd./ Beulah St.	D	D	C	C
17	Telegraph Rd./ S. Van Dorn St.	C		D	D
18	Route 1./ Telegraph Rd. - Old Colchester Rd.	D		E	E
19	Route 1./ Fairfax County Parkway.	D		D	D
20	Route 1./ Backlick Rd. - Pohick Rd.	D		F	F
21	Route 1./ Belvoir Rd.	B		B	
22	Route 1./ Old Mill Rd.	E	E	E	
23	Loisdale Rd./ GSA Access Rd	A	A	A	A

LEGEND

INFLUENCE OF PREFERRED ALTERNATIVE ON LOS = [REDACTED]

Figure 1 – Variation in “Constrained” 2011 Build Volumes

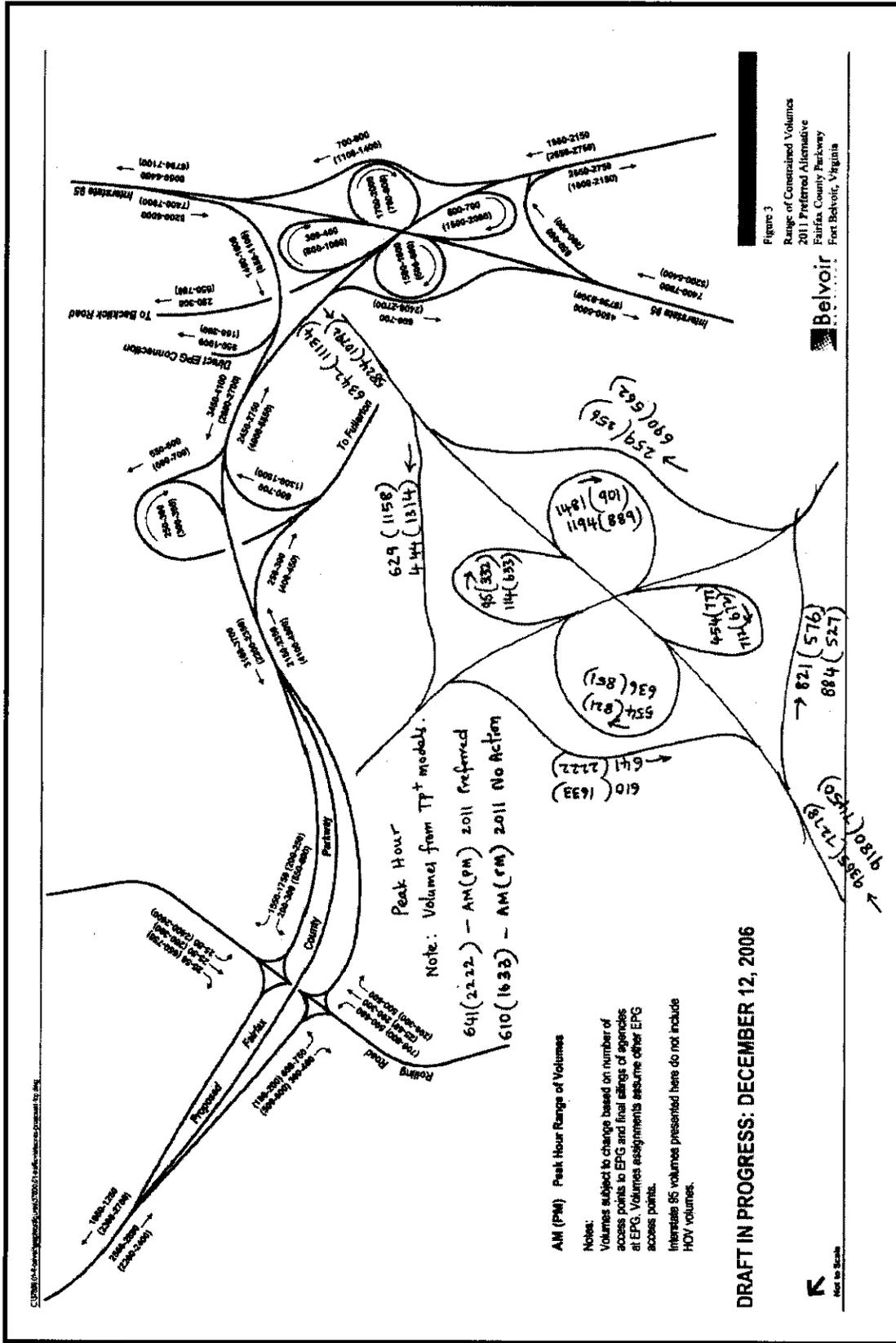


Figure 2 – Unconstrained 2011 Build Volumes

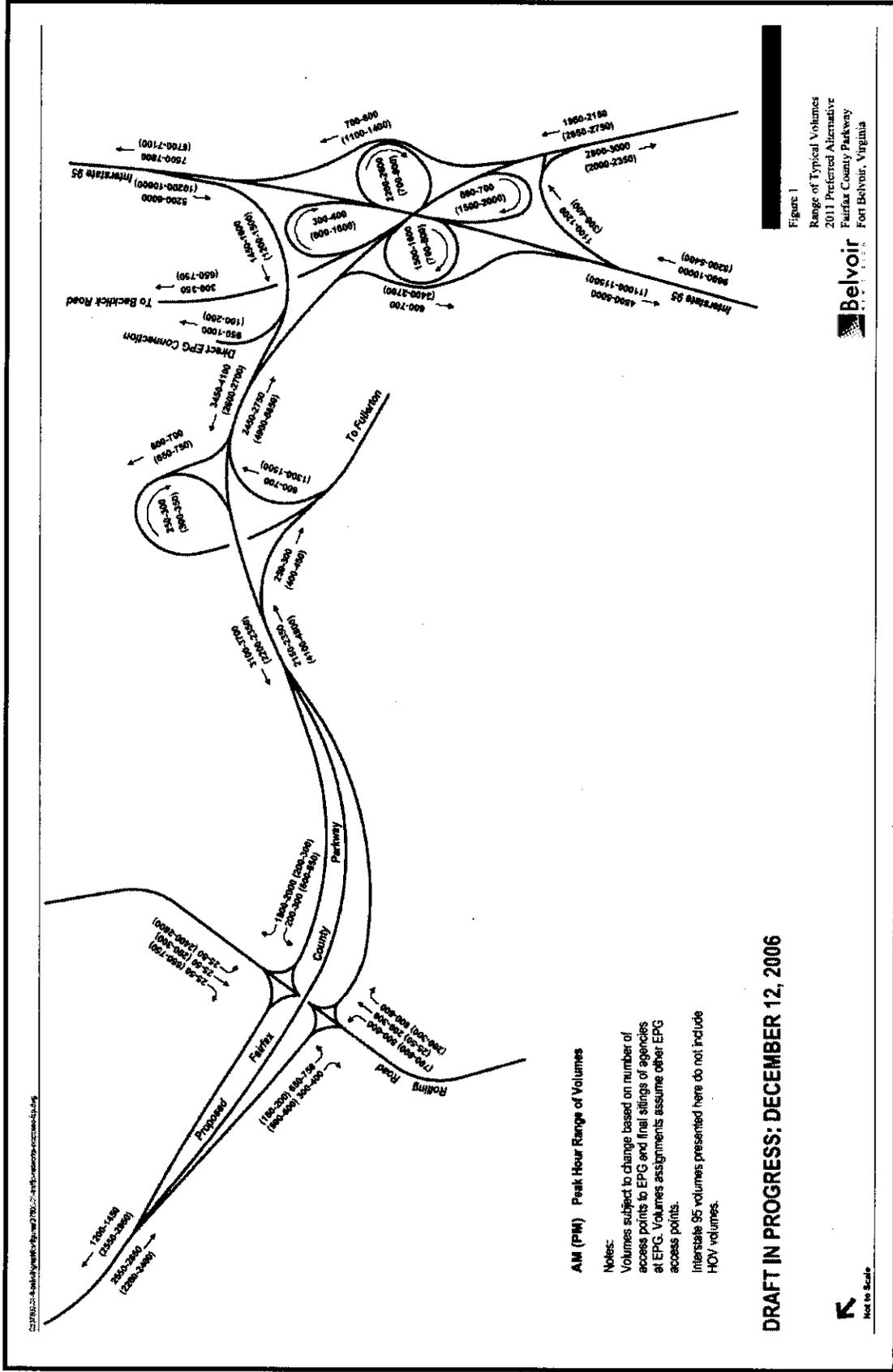


Figure 3a – Turning Movements at US 1 / Telegraph

- Screenshot from 2011 Preferred Alternative TP+ model:

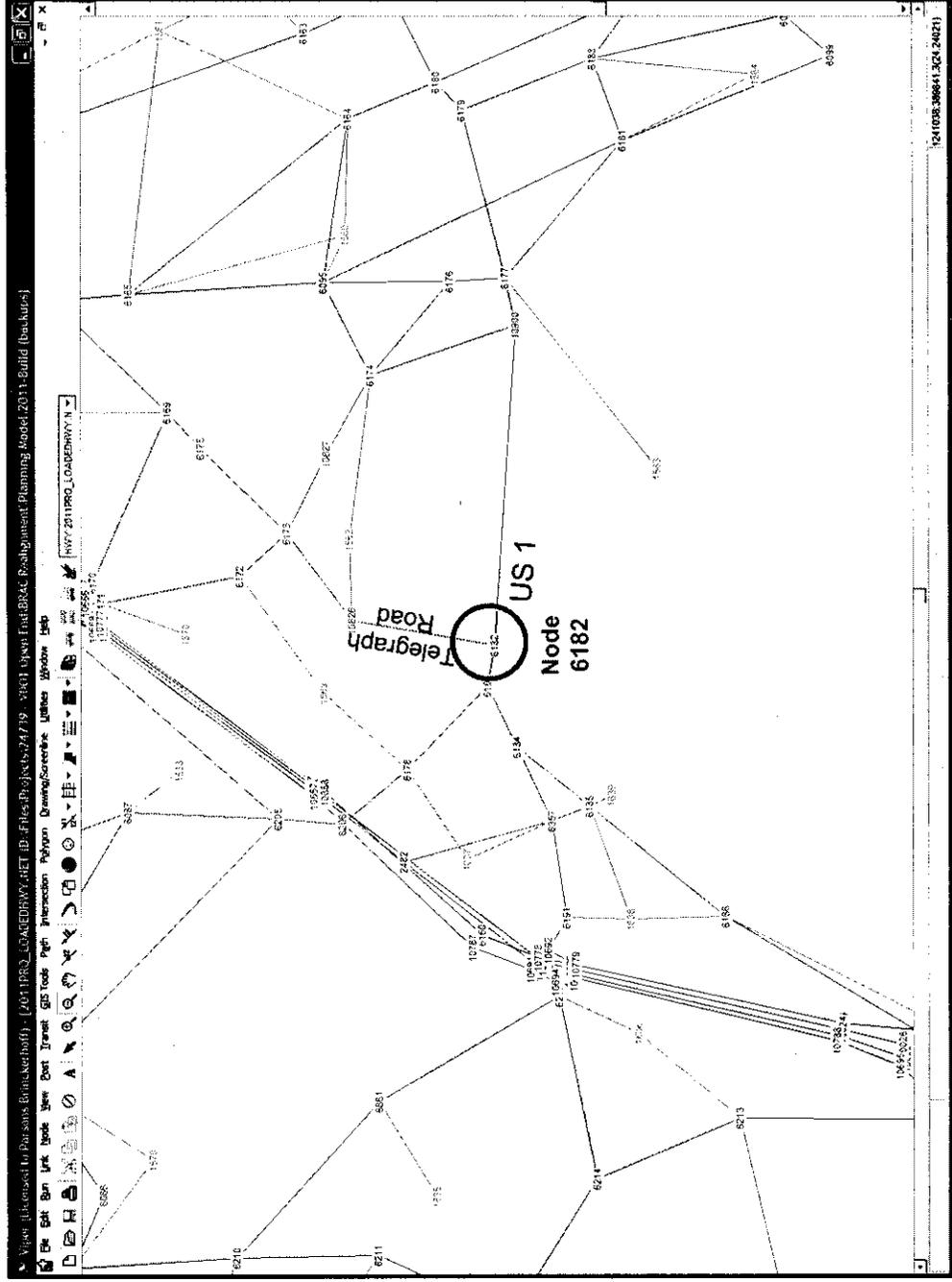
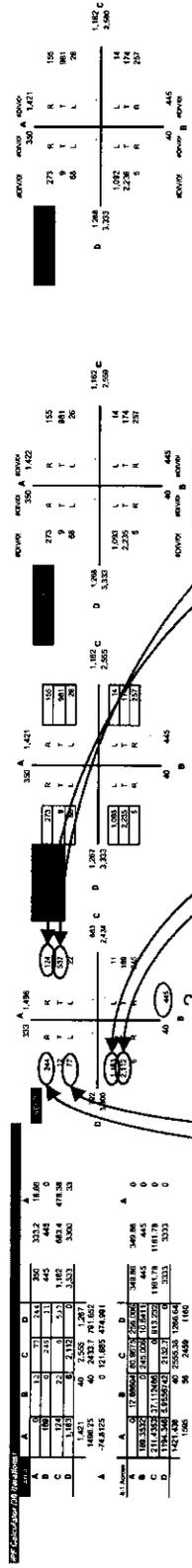
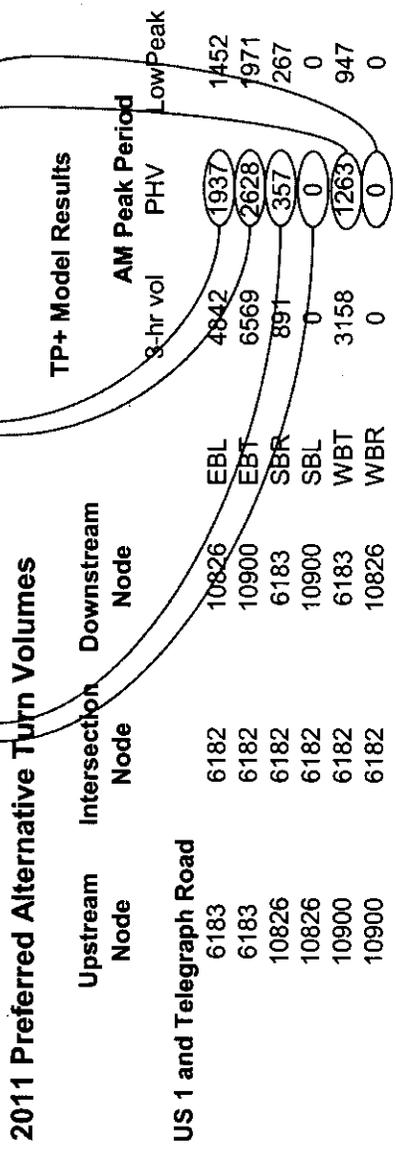


Figure 3b – Supporting calculations for turning movement count at US 1 / Telegraph Road

- Excerpt from refined 2011 Preferred Alternative – Step1.xls:



- Turning Movement Volumes from TP+ 2011 Preferred Alternative:



- No correlation between TP+ model and turning movement smoothing

**Prepared Remarks of Pierce R. Homer
For
Fort Belvoir BRAC Draft Environmental Impact Statement
Public Hearing
April 17, 2007**

Secretary Eastin, Colonel Lauritzen, ladies and gentlemen: good evening.

I am Pierce Homer, Secretary of Transportation for the Commonwealth of Virginia.

I would like to thank you for the opportunity to be here so that I may discuss some of the opportunities and challenges facing the Army and the Commonwealth as a result of the BRAC action. The subject of tonight's public hearing, the Draft Environmental Impact Statement, has certainly brought to light the extent of the challenges we face at Fort Belvoir and the Engineer Proving Grounds.

I will be submitting formal comments for inclusion in the study later this month. These will be more detailed and include additional traffic analyses.

Virginia's Military Tradition

Let me begin by expressing how proud we are of the many military installations in Virginia. The Commonwealth is home to the Pentagon, Quantico - the largest naval base in the world, Air Combat Command and many other important and strategic installations. We are proud to be the home of several hundred thousand military personnel, - - active, reserve and retired.

Virginia's military installations have always played an important role in our communities and it is difficult to separate what is good for Virginia, from what is good for our men and women in uniform. The Commonwealth and the United States Government have a history of partnering to resolve challenges related to the provision of infrastructure required to support these world class facilities, while simultaneously maintaining or improving the quality of life expected by the communities in which these facilities are located.

The Commonwealth's Commitment

The Commonwealth's reputation as a military friendly community capable of supporting the armed forces is one of the main reasons Virginia was chosen to accommodate an additional 22,000 jobs at Fort Belvoir and Engineer Proving Grounds. However, this must remain a partnership. We have pledged to continue to partner with the Army to resolve the many issues associated with this BRAC action.

The Commonwealth's commitment to this project is evident in staff resources allocated to work with the Army and the tremendous financial commitments made by the Commonwealth Transportation Board to enhance the I-95 and the Fairfax County Parkway corridors. VDOT staff has provided planning and engineering expertise to the Army during the preparation of the DEIS and will continue to do so going forward.

Additionally, in this time of austere transportation budgets, the CTB has allocated over \$90 million dollars to widen I-95 to eight lanes between Newington and Route 123. This project will be under construction by early 2008 and is critical to helping mitigate the impact of the BRAC action.

We are also proceeding to develop the I-95 High Occupancy Toll Lanes along I-95. These lanes will be a tremendous benefit for federal employees who choose to use public transportation, carpool or van pool or want to pay an additional fee for driving alone in the HOT lanes.

The CTB has also allocated \$89 million dollars for the extension of the Fairfax County Parkway between Franconia-Springfield Parkway and Fullerton Road. We have pledged to provide this funding to the Army so the Parkway can be constructed at the same time as other mitigating road improvements are implemented. VDOT is in the process of acquiring the private rights of way necessary for the extension of the Parkway, a process that began several months ago, in recognition of the need to move quickly on this project.

However, these improvements alone will not mitigate the impact caused by the Federal Government's decision to relocate 22,000 jobs to Fort Belvoir and Engineer Proving Grounds. The Army's DEIS makes this point abundantly clear.

Impacts of the Fort Belvoir/EPG BRAC Action

The DEIS reminds us of one of the BRAC Commission's selection criteria – which is - “the ability of the infrastructure of both the existing and potential receiving communities to support forces, missions and personnel”. Unfortunately, analyses were not performed prior to making this decision and we are now faced with the challenge of how to develop the necessary infrastructure to accommodate the BRAC action. Given the resources available for transportation needs across the Commonwealth, it is clear that without substantial federal funding to plan, design and construct the necessary roadways and transit facilities in and around Engineer Proving Grounds and Fort Belvoir made necessary by the BRAC decision, the transportation infrastructure cannot support the land use alternatives presented in the DEIS.

Under NEPA, the evaluation of the impact on the Human Environment includes how it affects or impacts our quality of life. As we all know, additional time stuck in traffic negatively impacts our quality of life and productivity of our workforce. Even more important is the impact of increased traffic on the safety of our citizens. Time spent in traffic congestion and the safety of those who travel our roads are as an important an issue for the military as they are for us. It does not benefit the Department of Defense if military personnel are unable to get to work in a timely fashion, or are put at risk due to traffic conditions. That is why we must work together to achieve a solution to the negative impacts of such a large relocation.

To off-set these impacts, the DEIS suggests several roadway and transit improvements be implemented for the Preferred Land Use Alternative. The total price tag of these improvements is close to one-half billion dollars. To date, not one penny has been provided for these projects, the environmental impact of these improvements has not been analyzed, detailed design of the improvements has not occurred and discussions with transit providers has not happened. Therefore, it seems extremely doubtful

that most of the mitigating transportation improvements outlined in the DEIS will be in place by September 2011, if at all.

What will the near future hold if these improvements are not funded by the Federal Government and constructed by September 2011? Allow me to quote your own consultant's analyses within the DEIS:

- “Long term significant adverse effects would be expected. Implementing the Preferred Alternative, when compared to the No Action Alternative, would worsen traffic conditions in the immediate vicinity of Fort Belvoir”.
- “Intersectionswould deteriorate over the No Action Alternative and existing conditions because traffic volumes at these intersections would be higher from the additional employment”.
- “Some localized congestion points might result with the increased traffic volumes within the I-95 and Fairfax County Parkway interchange”.
- “Even with VDOT’s I-95 Fourth Lane Project, the hours of congestion on I-95 are expected to increase by 30 to 45 minutes. The duration of congestion along U.S. Route 1 would increase by approximately 30 minutes if there is no widening of U.S. Route 1”.
- “Along the Fairfax County Parkway east of I-95, the duration of congestion would likely increase by an hour”.
- “In the areas surrounding EPG, severe congestion lasting 3 to 4 hours would occur”.
- “Queuing of traffic from the access point off the Fairfax County Parkway adjacent to EPG can be expected to back up onto the I-95 corridor. This queuing would translate into an extension of the AM congested period by over an hour to 2 hours”.

Clearly, if significant transportation infrastructure is not provided by the time 22,000 employees relocate to Fort Belvoir and EPG there would be devastating impacts. Those who would suffer include not only civilian commuters using I-95, U.S. Route 1 and Fairfax County Parkway corridors, but the 22,000 Defense personnel who must use these same roadways. Furthermore, surrounding neighborhoods and communities would be left to

deal with declining air quality, increasing noise, crowded buses and passenger rail systems, commuter lots that are over capacity and local roads jammed with cut through traffic trying to avoid congestion on the interstate and major arterials.

Conclusions of the Commonwealth's Review

Based upon the Commonwealth's review of the DEIS, we have concluded the following:

- 1) The Army's limited focus of the BRAC impacts on the human environment does not meet the review requirements under NEPA.
- 2) To make the environmental review process work, The proposed road improvements are connected to the BRAC land use action and must be studied in the same level of detail.
- 3) The DEIS misleads the public into believing the mitigating transportation improvements will be constructed in conjunction with the proposed office buildings.
- 4) The mitigating transportation improvements do not completely off-set the impacts of the proposed BRAC actions. Among the most critical roadway improvements ignored by the DEIS are improvements to the Fairfax County Parkway interchanges with I-95 and Franconia-Springfield Parkway.
- 5) The impact of constructing 6 million square feet of building space and 7 million square feet of parking structures on the existing roadway network was not provided. The daily influx of construction workers and delivery of materials will have tremendous negative impacts to commuters and the surrounding neighborhoods over the next three to four years.
- 6) Congress, through its Conference Report on the National Defense Authorization Act for Fiscal Year 2007 noted that "the decisions of the 2005 Defense Base Closure and Realignment (BRAC) round will have a significant impact on the transportation and infrastructure and national highway system in Northern Virginia supporting Fort Belvoir and Quantico. These effects, if not studied and addressed through a

long-term investment strategy, have the potential to adversely affect timely access to these two critical military installations, as well as the quality of life for military members and their families on the installations and in the local communities”. The DEIS does not provide a detailed discussion of the Army’s plans to fund a “long term investment strategy” nor does it discuss what, if any, contingency plans are available if adequate transportation funding is not provided.

Recommendations

As the Army considers the public comment that will be received tonight, I offer the following recommendations:

- 1) Accept responsibility for the transportation infrastructure upgrades made necessary by this BRAC decision and fund the improvements recommended by the DEIS to ensure there is no negative impact upon the community and military personnel who rely on this infrastructure.
- 2) Do not issue the Final Environmental Impact Statement and Record of Decision until all proposed mitigating road and transit improvements connected to the BRAC land use action are determined to be feasible through detailed studies required by NEPA. The proposed transportation improvements are connected actions and should be studied in the same Environmental Impact Statement as the BRAC land use actions. It is unacceptable to identify these improvements within the DEIS and rely on them to mitigate the impacts of the Army’s action without having first determined if they can ever be built.
- 3) Study and relay to the public not only the near term impacts of the BRAC action but also the long term (2030) impacts.
- 4) Seriously consider alternative solutions such as the use of the GSA warehouse site which would relieve the congested road network by locating thousands of employees near a METRO and VRE station. The “City-Center” land use alternative, for example, makes extensive use of the GSA warehouse site. This would take some of the pressure off the Fairfax County Parkway. The GSA site could be developed to allow direct access to Metro, VRE and commuter bus service. Serving the National Geospatial Agency on the Engineer Proving

Grounds site would allow for some of the innovative demand management techniques that have worked so well at the pentagon.

- 5) If changes to the DEIS occur based upon the comment you receive tonight, conduct as many hearings and meetings as necessary to educate the public about the changes and the impact of those changes.

In conclusion, the Army should amend the DEIS to comply with federal environmental requirements by adequately addressing the impacts the BRAC action will have on the existing and future transportation systems. The Army should not issue a Record of Decision and thus delay construction of the office buildings until it is known what level of funding the Department of Defense will provide to support the off-post transportation infrastructure to mitigate the impacts of this action. We can work together to design a better land use proposal than the preferred alternative. But to properly implement that will require substantial federal funding for improved highway, transit, and demand management services to this site.

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MR. CARR: Our next speaker this evening, representing the Governor of Virginia and the Department of Transportation at the same time,

Secretary Pierce Homer.

SECRETARY HOMER: Thank you, Colonel; very good to see some friends, Supervisor Hyland, and Kaufman, and Delegate Watts. I'd also like to acknowledge Cord Sterling from the Commonwealth Transportation Board. Mr. Sterling has been taking the point for the Commonwealth Transportation Board on all of the BRAC projects

around the Commonwealth and those impacts are very significant. I want to talk briefly about some of the opportunities, as well as challenges, facing us on this BRAC action, and for the record, Colonel, I'd like to thank you for the many courtesies you've extended to the Commonwealth as we've dealt with this very difficult issue, and we will be submitting a far more detailed and formal comments that will include some additional traffic analyses, as well. Let me start off by acknowledging Virginia has a great working relationship with the Department of Defense and facilities as diverse as the largest Naval base in the world, the Pentagon, Fort Belvoir, Quantico, Fort Lee. We have solved many, many infrastructure problems and found a way to make communities coexist alongside military installations across the Commonwealth, and we're very proud of that record. What we have found that works is the importance of sustaining and enhancing the quality of life in the surrounding communities, and that, Colonel, is the challenge that we face in this project. So what is -- let's start with the commitments, our commitment to this project is 22,000 jobs. For those of you in the audience, what does that mean; in perspective, 22,000 jobs is equivalent to the Pentagon, that's how many people go to work everyday at the Pentagon. So this is a daunting challenge for us. What do we have in the way of transportation infrastructure to address these problems? Well, we have one facility fully funded, the fourth lane on I-95, that's an approximately \$90 million project that will go to construction late this year or early next. That project is designed simply to take care of existing demand.

We have a second project, the extension of the Fairfax County Parkway, which is critical to the development of the engineer approving grounds, but again, primarily designed to address current and projected demands in the region, and that project is only partially funded, as we know. We've set aside approximately \$89 million for that. We are to move that project along and we do have some very serious design issues. You design a project to serve the number of jobs on the site and we need to know what that number is before we can complete that design. We have advanced writable acquisition. In fact, we now own the Central Motors site, which is a very critical piece of the right of way, and we are initiating the design of the utility relocation, which will be helpful when we get a fix on the number of jobs and their actual location to expedite the construction of that facility. However, Colonel, it's important to note that those improvements alone cannot serve this site, and if there's a single message I would leave with you it's that the transportation infrastructure that's laid out in the Draft Environmental Impact Statement, those cannot serve

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the employment projected for this site. In fact, if you look at committed improvements, we have about \$200 million in the Army's own arithmetic and about \$500 million unfunded that will lead to a very difficult and challenging traffic situation, and I would quote ~~20~~ just a couple of points from your own consultant's analysis, "and this assumes that all \$700 million worth of improvements would be made. Queuing of ~~4~~ traffic from access point off the Fairfax County Parkway and adjacent to the engineer approving grounds can be expected to back up into the I-95 corridor. This queuing would translate into an extension of the a.m. congested period by over an hour to two hours. In the area surrounding engineer approving grounds, severe congestion will last three to four hours. Along the Fairfax County Parkway east of I-95, the duration of congestion likely would increase by an hour." These are very significant impacts identified by your consultant and they are significant and they do affect the quality of life in these communities.

S5.2

What, Colonel, we would suggest to you is a couple of thoughts. The first is that the impacts of the BRAC relocation are not fairly reflected in the environmental document. In a community such as this, traffic impacts are the preeminent impact and they do need to be considered as part of the environmental statement. Secondly, that the inclusion of the

facilities in the environmental document creates the appearance of those facilities actually being funded, but there is no commitment, as of yet, to fund those. Third, that even when fully completed, the full set of improvements do not fully mitigate the impacts of the development. So what do we recommend, and Colonel, I do want to come back because these are very significant and serious issues that we have to deal with. We make several recommendations to you. First is that, as part of the Draft Environmental Impact Statement, it should include the transportation infrastructure as part of that because that's necessary to mitigate the impacts of the BRAC action. Second, we would recommend that there not be a final record of decision, that's the final action for those in the audience, the record of decision is the final action of the federal government, be undertaken until the mitigating road and transit improvements are identified and funded, that also opens up the opportunity for phasing, obviously. So as one of the things that the Army may want to think about is as employment is added or employment is added as infrastructure becomes available.

S5.3

Third, in your impact analysis, that you look at long term impacts. In transportation planning, we typically look at a 20 year time horizon, and it's very important that we not focus just on 2011, but we think about 2020, 2030, and the years beyond. Fourth, Colonel, and this is my second to last recommendation, but I believe it's

S5.4

probably the most important. As the representative of Senator Webb, Mr. Reagan indicated earlier, we agree strongly that there should be serious consideration of the use of the GSA Warehouse site. This could -- in this day and age, it is very difficult to create a regional employment center without any access to public transportation or direct access to HOV. You simply can't do that in this region. The GSA Warehouse site offers that opportunity, and this would help to minimize some of the impacts on the Fairfax County Parkway. It would also allow for direct access to Metro, so job employees coming from the north, as well as VRE employees coming up from the south, leaving, for example, intact the National GIS Spatial Agency onto the engineer approving ground site; that's about 8,500 to 9,000 jobs. Something like that in an agency, which is spread out over 24 hours, allows us to do some of the creative demand management techniques,

S5.5

in terms of flex time, ride sharing, that have worked very, very successfully, and everyone in this room has worked collectively to make some of those things work at the Pentagon. We know how to do this, and the NGA is an excellent agency to employ some of those techniques.

Colonel, let me close by extending an offer of help to you. We can work together to develop a better set of land use scenarios. I think everyone in this room understands that. Where we have to work together with our congressional delegation and state and local elected officials, is to identify the funding necessary to implement those. We can have a great plan, but it simply will not work, and I would say \$500 million is probably a minimum price tag to make something work in this area. Thank you for your time and patience. states that there will be no additional regional work trips.

That analysis on pages 436 through 437 likens the effect to reshaping a bean bag, stating that as Army jobs move out of lease space in Crystal City, Reston, Bethesda, and so on, those offices will be filled by other workers currently working elsewhere in this region. Such an assertion simply does not comport with this region's office vacancy factor. Empty space is filled by a domino effect that does not leave empty space elsewhere. Building 6.2 million square feet of new office space will mean a commensurate net regional increase in jobs, and therefore, regional work trips. Such a net increase in jobs also will swell the regions housing sprawl more than has been assumed. In this robust economy, jobs drive growth. According to a recent George Mason University study, one of the reasons, historically, that this region has not adequately planned for its transportation needs is that while job growth has been correctly projected again and again, the number of households that will be created has always been underestimated. "The current round 6.4A forecast assumes 2.2 jobs per household. The proposed round seven forecast assumes 1.8 jobs per household." Reality, according to the George Mason Study, is 1.6 jobs per household. The increased residential sprawl produced by creating a net increase in work space for 22,000 jobs, 6.1 percent of the total employment in Fairfax County currently, will be substantial.

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The conclusion that regional traffic impact will not be significant, also assumes that by September 2011, 50 percent of the personnel whose jobs will be relocated, will shorten their commute by moving closer to EPG Fort Belvoir. Unless this assumption has been tested in a region with comparably high proportion of two income households, such an assumed relocation is overly optimistic. In fact, almost buried back on page 388 is this very point, "an employee's decision to move could depend on factors such as the location of a spouse's places of employment, changing a child's school district, proximity to family and friends, and the cost of housing." Finally, the DEIS assumes that projects on VDOT's six year plan and on the Fairfax County CIP will be completed "within their perspective time frames." First, I hope it's understood that being on the six year plan does not necessarily mean that a project will be completed within six years. With that -- it only means that some work will be taking place during the six year period. With that clarification, a more critical issue is that the DEIS includes these projects in the baseline for determining the impact of adding 22,000 jobs. This is not appropriate. Projects currently on Virginia's six year plan and the Fairfax CIP are being undertaken, as noted by the Secretary, to add desperately needed regional capacity to alleviate current traffic congestion, not to accommodate this massive BRAC relocation, which was not anticipated. Statements in the DEIS such as, "hours of congestion along the I-95

55.7

corridor, are not expected to increase substantially because the growth and demand would be less than five percent," should be stricken. Five percent more vehicles in a supersaturated solution is total hours and hours of gridlock; now to the local impact. What's puzzling is just that just three pages after that statement, that a five percent increase in demand is not substantial, the DEIS declares, "in areas immediately surrounding EPG, severe congestion, as it's already been noted, lasting three to four hours, would occur if mitigating actions, including transportation improvements, are not taken." This statement is welcome as the tough analysis I applaud. The DEIS then goes on to make a very strong case for and hopefully, underscore, underscore, a commitment to fund under the defense access road program 14 essential transportation projects, including expanded bus service, costing \$458 million for the preferred alternative. I especially want to commend those who put together this draft for following through on my earlier concerns expressed about the critical need for a grade separated intersection at the Franconia Springfield Parkway near Newman Street. It is crucial that the detailed traffic analysis, which justifies all 14 expenditures as a cost of BRAC, not be overridden by sweeping summary statements elsewhere in the DEIS. The DEIS is to be commended for recognizing that state and local agencies require for development "that they control, that developer mitigate those affects with some improvements to the transportation needs."

55.8

Such routine, large developer outlays are over and above significant, local, and state fees, and annual taxes that the military will not be paying as an employer. In this context, it is indeed appropriate that the 14 mitigating transportation improvements be funded by the Army. State and local transportation funding will have more than enough to cover an emirate of other improvements necessitated by BRAC relocation, such as dealing with the significant problems that will be exacerbated on Rolling Road and Backlick Road, and by the way, from Annandale, I took Rolling Road over, even though Google told me to get out on the beltway and come down on 95, and by the way, it's also shorter by mileage, not to mention that I was avoiding congestion, and that's exactly what many of the employees who are currently working in Crystal City and others being relocated will do who live in districts that are identified. If the funding were guaranteed, it is possible that the -- excuse me, I'm sorry, I've left out one paragraph and I'm going to continue rolling through. Timing is the next section. These transportation projects are, as

55.9

has already been noted, critical to mitigate reduced employee productivity on "higher commuting and a degradation of quality of life, not limited to personnel, but also through commuters and the local community." These projects are so critical that the relocation of employees to EPG Fort Belvoir must not proceed until all of the direct Bolton transportation projects are complete and the transit connection are operative. If the funding for these were guaranteed, it is possible that the engineering and design work right of way acquisition and road construction could be completed in four years. However, it is probable that federal environmental analyses and TPB air quality review will push completion of these transportation projects beyond September 2011. This is especially likely if getting TPB approval depends on the highly debatable assertion in the DEIS that "implementing the preferred alternative and the realignment of Fort Belvoir would decrease both the number of vehicles and the total vehicle miles traveled within the region." If this assertion is to be sustained in the air quality review, transit must be revisited, not only for the VRE service to the south, but also for personnel to be relocated

55.10

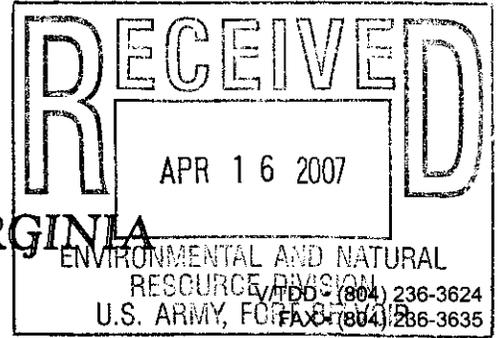
who currently live in districts A, D, G, H, and I, which is the area that I was referring to, large portions of which are well served by transit.

In addition to requirements that may prevent essential transportation projects from being completed by September 2011, the DEIS notes a number of other reviews and approvals that must occur before the site development and building construction can begin. These issues involve Chesapeake Bay protection areas, wetland preservation, petroleum storage, solid waste management, asbestos, and hazardous materials. In view of these required procedures and the necessity to get congressional funding for congested mitigation projects, I would request that the final EIS contain a specific time table with specific actions that must be completed by date certain or trigger a September, to trigger, excuse me, a September 2011 occupancy being moved back accordingly. For example, the DEIS states "the peak year of construction and renovation expenditures would be 2008," and table 4.10-9 lays out subsequent expenditures year by year. The construction projects used to generate this table should be listed on a critical path to actuate decisions to extend leasing spaces so that the movement of personnel to EPG in Fort Belvoir will be delayed until building construction, and most importantly, all of the Bolton congestion mitigation steps are in place.

And in conclusion, I would like to acknowledge that my total commendation seriously for the steady hand and receptive demeanor of Colonel Lauritson and likewise, I'd also like to commend the desire to explore all options and establish sound factual information displayed by Assistant Secretary of the Army, Keith Easton. They have made this very challenging undertaking as respectful and rational as possible and I do thank you.

55.11

SG



COMMONWEALTH of VIRGINIA

Department of Aviation
5702 Gulfstream Road
Richmond, Virginia 23250-2422

Randall P Burdette
Director

April 9, 2007

Mr. Patrick McLaughlin
Fort Belvoir Directorate of Public Works
Environmental and Natural Resources Division, Building 1442
9430 Jackson Loop
Fort Belvoir, Virginia 22060

Re: **Base Realignment and Closure (BRAC) Commission-DEIS
Recommendations for Fort Belvoir, Virginia**

Dear Mr. McLaughlin:

Thank you for requesting our comments on the Project concerning the Base Realignment and Closure (BRAC) Commission recommendations for Fort Belvoir, Virginia and the associated Draft Environmental Impact Statement (DEIS).

The Virginia Department of Aviation has reviewed the document and does not have any comments concerning this project at this time. From our review of the document as presented, the recommendations should have no direct impact on any Virginia Airport. The Department of Aviation appreciates the opportunity to comment on this project.

SG.1

Sincerely,

R. N. (Rusty) Harrington
Manager, Planning and Environmental Section
Airport Services Division

tbm/



Appendix K.3
Comment Response Matrix

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Commenter	Comment #	Comment Type	Name
F 1	F1.1	Elected Official	Jim Webb
Section	Page Number	Organization	
4.3 Transportation		U.S. Senate	
Comment			
As it's been pointed out repeatedly since the enactment of BRAC in 2005, without significant new resources for transportation by 2011, the road system in and around Fort Belvoir will fail. This will leave current residents and incoming employees at Fort Belvoir marred in traffic. To this end, Senator Warner stands ready to work closely with the Army, the Department of Defense, and state and local officials to direct additional resources to transportation improvements for Fort Belvoir and the surrounding community.			
Response			
The Army recognizes the need for transportation improvements to mitigate impacts from the BRAC action. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.			

Commenter	Comment #	Comment Type	Name
F 1	F1.2	Elected Official	Jim Webb
Section	Page Number	Organization	
Other		U.S. Senate	
Comment			
There is the second aspect of the draft EIS that the Senators asked me to briefly comment on, and this pertains to the GSA Warehouse facility in Springfield. Senator Webb understands that this has been a particular priority for Congressman Moran and for Congressman Davis. He shares their assessment that the GSA Warehouse site holds enormous promise as a partial solution for the transportation challenges inherent in Fort Belvoir's realignment. To have some 70 acres of federal property at the endpoint of the blue line, gives us a unique opportunity to place more of the incoming jobs in a location that is convenient to one of the regions best transportation facilities; transit oriented development works.			
Response			
The EIS examines use of the GSA Site as part of the City Center Alternative. The Army appreciates Senator Webb's support for implementing BRAC. Because the BRAC recommendations direct realignment to Fort Belvoir, and GSA is not part of Fort Belvoir, additional legislation would be needed to allow use of the GSA parcel.			

Commenter	Comment #	Comment Type	Name
F 1	F1.3	Elected Official	Jim Webb
Section	Page Number	Organization	
Other		U.S. Senate	
Comment			
Finally, while it is perhaps beyond the scope of the draft EIS, Senator Webb holds deep concerns about the time table for completion of this massive project. A realistic and dependable planning and construction schedule is essential to maintaining the public's confidence and the community's confidence in the realignment of Fort Belvoir.			
Response			
The Army recognizes the magnitude of its task to implement BRAC. Establishment of the Belvoir New Vision Planners (BNVP) and coordinated efforts will help meet the statutory deadline. Only legislative relief would allow extension of the schedule beyond September 15, 2011.			

Commenter	Comment #	Comment Type	Name
F 2	F2.1	Elected Official	Jim Moran
Section	Page Number	Organization	
4.3 Transportation		U.S. House of Representatives	
Comment			
<p>As part of the draft EIS, the Army Corps of Engineers identified 13 necessary transportation mitigation measures. You may have already discussed this, but I'm going to say it again because it needs to keep being emphasized, and in the Corps of Engineers words and I quote, "to maintain the transportation system's operational performance at an acceptable level of service and delay." What they consider to be acceptable is probably conservative, but these 13 measures are just necessary to maintain an acceptable level of delay.</p> <p>Now, this credible analysis of the Corps, I guess we should be pleased that it justifies what we have been stating since the recommendations came down. We absolutely need major road improvements to make BRAC work, and without those improvements, the Army's own Engineering Corps says that, number one, in the areas immediately surrounding the EPG, severe congestion will last three to four hours every peak hour period. Access points to EPG will only be able to process between 40 to 50 percent of the projected peak hour demand for both the morning and evening commutes.</p> <p>Queuing of traffic from the access point to the EPG will back up onto I-95, we know that, and that queuing will extend the morning congested period between one and two hours. You're going to have a back up of as much as two hours on Interstate 95. In the evening peak period, this congestion will spread over several additional hours.</p> <p>If the main access point to the EPG is not completed, there will be only one road entrance point for all vehicular traffic, and thus, work arrivals will be spread out over an 11 to 12 hour period due to limited capacity. Think about that now. You could have as much as an 11 hour period of people trying to get to work. This is from the Army's own Corps of Engineers, bottlenecks resulting from BRAC traffic will negate the improvements made to regional congestion by the major transportation projects such as the Springfield interchange, Mixing Bowl, the I-95 fourth lane project, and the Wilson Bridge project.</p> <p>We spent over half a billion dollars for the Mixing Bowl, we spent more than 2.6 billion for the Wilson Bridge, and we're going to spend more on the beltway and on what we call 395 -- the I-95 north and south road, and yet all of it is (off mike), it's negated if we can't fix this. Without proper action military readiness will also suffer after the BRAC realignment, there will be nearly 100 tenant organizations at Fort Belvoir, quoting Missile Defense Agency, the Defense DITRA, the Defense Threat Reduction, Nea National GeoSpatial Intelligence, Defense Logistics Agency -- are you able to keep up with me on -- holy smokes; the DLE and the Intelligence and Security Command, Edscha.</p>			
Response			
<p>Comment noted. The Army recognizes the need for transportation improvements to mitigate impacts from the BRAC action. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. Among the recommended mitigating actions are access improvements for the EPG site.</p>			

Commenter	Comment #	Comment Type	Name
F 2	F2.2	Elected Official	Jim Moran
Section	Page Number	Organization	
Other		U.S. House of Representatives	
Comment			
<p>Now, I've got one other issue I want to raise. One primary concern with this draft EIS, and this is a criticism of it, is the absence of the GSA Warehouse site. Congressman Davis and I have worked very hard, as my colleagues on the Fairfax County Board know, to incorporate this into the planning for the BRAC relocation because it's located right next to the Springfield Franconia Metro Station with VRE access. It makes so much sense to build at that Metro and VRE station. It provides the only opportunity to conclude public transportation planning in the Fort Belvoir realignment, and when transportation is the number one concern, and the Army certainly recognizes that, you do, Colonel, and Don, you're fully in agreement here, it's the number one concern.</p> <p>Well, then it only makes sense to try to alleviate traffic as best we can by getting those cars off of the road and onto public transit. The GSA Warehouse site needs to be included in this planning, and the inclusion of that site would split the relocation of employees between the EPG and the GSA, and doing so would ease the local traffic problems on secondary roads, roads that are going to be the most clogged in rush hour.</p> <p>It's a common sense measure, and so I think it really has to be included in our planning. But despite repeated meetings in our Capital Hill offices, we've met in my office, we've met at Tom's office, we -- Senator Warner has hosted a number of meetings, we brought GSA and Army officials to the same table, but yet we can't make it a reality. DOD could administratively transfer that land today by helping the GSA move their tenants to other locations and include the site in the final Environmental Impact Statement. But these long discussed plans haven't come for wishing.</p> <p>As I have to say, I think DOD's position has been somewhat intractable and that, unfortunately, is symptomatic of much of DOD's approach, which hasn't made a whole lot of sense with regard to this aspect of the BRAC policy, and I find it frustrating, disappointing, and I think most appropriate to be changed in legislation.</p>			
Response			
<p>The GSA Site is examined as part of the City Center Alternative. Because the BRAC recommendations direct realignment to Fort Belvoir, and GSA is not part of Fort Belvoir, additional legislation would be needed to allow use of the GSA parcel. A decision on whether it will be used will be announced in the Record of Decision.</p>			

Commenter	Comment #	Comment Type	Name
F 2	F2.3	Elected Official	Jim Moran
Section	Page Number	Organization	
Other		U.S. House of Representatives	
Comment			
<p>I'm going to conclude by saying despite the best efforts of Colonel Lauritzen and his team of planners and developers, I do not believe that the BRAC realignment will be completed by the 2011 deadline, and since that is the case, I think we have to insist that the Department of Defense reconsider its approach to rushing this effort through. The future vitality of this region, its high quality of life standard and its relationship with the Army, is dependent on a thoughtful approach to BRAC that is supported by adequate resources. I hope the Army takes this sentiment and that of the public sentiment that is offered here tonight back to the Pentagon to ensure that the Fort Belvoir realignment is done right, not just done by the deadline. Thank you.</p>			
Response			
<p>The Army recognizes the magnitude of its task to implement BRAC. Establishment of Belvoir New Vision Planners (providing additional manpower resources and expertise to the Army) and coordinated efforts will help meet the statutory deadline. Only legislative relief would allow extension of the schedule beyond September 15, 2011.</p>			

Commenter	Comment #	Comment Type	Name
F 3	F3.1	Elected Official	Tom Davis
Section	Page Number	Organization	
4.3 Transportation		U.S. House of Representatives	
Comment			
<p>In reviewing the draft EIS, I've identified a number of flaws. The draft is based on the assumption that the 2011 deadline will be met and that a number of significant transportation improvements will have been constructed.</p> <p>During the hearing I chaired last August at Rolling Valley Elementary School, I expressed my belief that the Army's five year timeline was impractical, a view I maintain. As a former county supervisor, chair of the county board, and in my current position as a member of Congress, I have significant experience dealing with major transportation projects.</p> <p>The 13 recommended in the draft EIS can normally be expected to take over 10 years, from conception to ribbon cutting. We have less than five until the 2011 deadline passes. Reinforcing my skepticism is the fact no one has stepped forward to identify funding sources for these projects. The one for which substantial funding has been identified, the completion of the Fairfax County Parkway, is still stalled despite assurances that disagreements over environmental issues would finally be resolved. It is wrong for the Army to limit itself to those options that could theoretically be in place by September 2011, since it is unlikely that deadline will be met.</p>			
Response			
<p>In a land use EIS study, as this BRAC EIS is, the process includes evaluating the impacts to the transportation system from the build out that is expected to be in place by opening year, which is 2011 in this case. This evaluation takes into consideration the approved transportation plans developed by VDOT and Fairfax County, as well as any assumed additional access points for the project. Once the evaluation of the network is complete, then the EIS should identify potential mitigation actions/projects to offset the impacts of the action on the transportation network. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.</p>			

Commenter	Comment #	Comment Type	Name
F 3	F3.2	Elected Official	Tom Davis
Section	Page Number	Organization	
Other		U.S. House of Representatives	
Comment			
<p>It is also disingenuous for DoD to seek shelter behind the BRAC statute since they originally requested all of these realignments. In effect, DoD got what it asked for. All options must remain on the table, in the interest of good planning and the long term health of the region. The draft EIS also relies too heavily on the engineering proving ground as the future location of DoD activities.</p> <p>If BRAC is an exercise of getting ten pounds of stuff in a five pound wrapper, EPG is like getting the camel through the proverbial eye of the needle. EPG currently has no supporting infrastructure. How can it accommodate 18,000 personnel and the associated commutes in less than five years? Under the preferred alternative, commuters to EPG will experience unacceptable delays getting to and from their work places. As the draft says, these delays will likely extend onto I-95, thereby degrading traffic flow on that vital artery.</p>			
Response			
<p>The EIS identifies impacts associated with potential use of the EPG, other areas of the post, and the GSA Site. Project planning recognizes the challenges inherent in meeting the statutory deadline. The Army intends to devote the required resources to implement BRAC as intended by Congress. The EIS process has revealed challenges and costs that were not known when DoD made its recommendations. Only legislative relief would allow extension of the schedule beyond September 15, 2011.</p>			

Commenter	Comment #	Comment Type	Name
F 3	F3.3	Elected Official	Tom Davis
Section	Page Number	Organization	
Other		U.S. House of Representatives	

Comment

Since I learned of the Army's plans for EPG, my colleagues and I have sought to make the GSA Warehouse facility in Franconia available for BRAC related purposes. This property is located next to existing Metro and VRE stations, thereby maximizing existing transit options. Moreover, it could reduce the number of personnel on EPG, which should be a primary goal given the limited entrance and egress options.

As part of this effort, my colleagues and I included a provision in the FY07 DOD Authorization Bill requiring the Army to study the feasibility of using the GSA property. Last night, I received this report. The crux of which is that up to 9,000 personnel could be located on the property, but it would require additional transportation improvements and it would not be complete until after 2011.

Response

Potential use of the GSA Site is examined as part of the City Center Alternative. Because the BRAC recommendations direct realignment to Fort Belvoir, and GSA is not part of Fort Belvoir, additional legislation would be needed to allow use of the GSA Site.

Commenter	Comment #	Comment Type	Name
F 3	F3.4	Elected Official	Tom Davis
Section	Page Number	Organization	
4.3 Transportation		U.S. House of Representatives	

Comment

I do not view the 13 transportation projects listed in the draft as a complete list. It is likely additional measures will be needed in order to accommodate BRAC. As I have said above, the deadline should not disqualify the GSA property from consideration. The draft DEIS lists a number of steps that could be taken in order to mitigate the effects of BRAC. These include road projects mentioned above, expanded transit options, a transportation management coordinator, and other congestion management tactics. These could indeed provide mitigation, but only if somebody pays for them.

I expect DOD to do its part in paying for the infrastructure needs created by BRAC. With Fort Belvoir in mind, I have passed legislation clarifying DOD has the ability to share the cost of transit projects, not just road projects, as part of the Defense Access Roads Program. Unfortunately, I have yet to receive assurances from the Army that it will dedicate resources in a meaningful way.

My final comment regarding transportation will be this. The personnel should move to Fort Belvoir only once the necessary infrastructure is in place. Absent this approach, the effects on the road system in Northern Virginia and the harm to surrounding neighborhoods will be unacceptable. The future of the Northern Virginia region depends on the successful implementation of BRAC at Fort Belvoir. The Army must be willing to dedicate the resources needed to build the necessary infrastructure. It must also conduct sound planning, focusing on the long term health of the fort and the region, rather than affixed on attainable deadline. I look forward to continuing to work with the Army to achieve these goals. Thank you.

Response

This land use EIS identifies potential mitigation actions/projects to offset the impacts of the action on the transportation network. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. The BRAC statutory deadline may not allow for completion of all transportation projects before the realignment deadline. A potential shuttle service has already been identified as one of the five bus services areas as a mitigating action in Section 4.3.4.4. Such transit services could also include interim shuttle services as services to augment the proposed transit shuttles. This would be done as a congestion management technique while the roadway improvement projects are under construction.

Commenter	Comment #	Comment Type	Name
F 4	F4.1	Federal Agency	Roberto Fonseca Martinez
Section	Page Number	Organization	
4.3 Transportation		Federal Highways Administration	

Comment

The DEIS recognizes the significance of the proposed action on transportation but does not include an environmental analysis of the transportation improvements identified as potential mitigation measures.

Response

The Army recognizes the need for additional studies. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.

Commenter	Comment #	Comment Type	Name
F 4	F4.2	Federal Agency	Roberto Fonseca Martinez
Section	Page Number	Organization	
4.3 Transportation		Federal Highways Administration	
Comment			
Based on numerous statements in the DEIS which are noted below, it is clear to FHWA that improvements to the transportation system will likely need to occur to address existing traffic congestion in the area and the increased traffic resulting from the Belvoir BRAC. As you are aware FHWA cannot adopt the EIS as the basis for any subsequent NEPA approvals for modifications to the highway system requiring our approval because the NEPA analysis for those actions was not included in the EIS. Future transportation improvement identified as mitigation may require their own NEPA analysis in addition to the planning, programming, design, and construction steps that need to be considered for any proposed transportation improvement.			
Response			
The Army recognizes the need for additional studies. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.			

Commenter	Comment #	Comment Type	Name
F 4	F4.3	Federal Agency	Roberto Fonseca Martinez
Section	Page Number	Organization	
4.3 Transportation		Federal Highways Administration	
Comment			
The DEIS recognizes the significance of the action on transportation. In Section ES.6.2 Transportation, "The BRAC action would be expected to have significant effects on the transportation system, regardless of the land use alternative selected." The document states, "Any significant traffic effects as a result of the BRAC action should be mitigated with transportation improvements, such that the negative effects become minor or negligible." The DEIS identifies a series of improvements that "would be needed to maintain the transportation system's operational performance at an acceptable level of service and delay." The Army's "order-of-magnitude" costs for the 13 mitigation actions are estimated to be \$458 million for the Preferred Alternative. Comment: The EIS should address a potential plan of action regarding project development, design, additional NEPA, if required, and implementation of the identified transportation improvements.			
Response			
The Army recognizes the need for additional studies. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.			

Commenter	Comment #	Comment Type	Name
F 4	F4.4	Federal Agency	Roberto Fonseca Martinez
Section	Page Number	Organization	
4.3 Transportation		Federal Highways Administration	
Comment			
The DEIS recognizes impacts on the transportation network as a cumulative effect that "would be mitigated through roadway improvements by the developers" (P. ES-16) without identifying the developers. Comment: The EIS should define who are the "developers" and describe how they will implement the "mitigation."			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. Funding of transportation projects will also be addressed in the ROD. Text clarified to state "developers of the off-post road projects".			

Commenter	Comment #	Comment Type	Name
F 4	F4.5	Federal Agency	Roberto Fonseca Martinez
Section	Page Number	Organization	
DOPAA		Federal Highways Administration	
Comment			
Road infrastructure description/quantities (P. 2-20) appear to include only work within the base: 92 acres clear/grub, pavement demolition (18.6 acres), road surfaces (80 acres), 1 bridge (Accotink Creek), 2 bridge replacements (Dogue Creek, Accotink Creek). Comment: The EIS should clarify whether these numbers include any off-base work.			
Response			
The listed infrastructure projects encompass only on-post work.			

Commenter	Comment #	Comment Type	Name
F 4	F4.6	Federal Agency	Roberto Fonseca Martinez
Section	Page Number	Organization	
4.3 Transportation		Federal Highways Administration	
Comment			
In reference to needed transportation improvements, the DEIS indicates (P 4-30) "Detailed operational analyses of any proposed mitigating actions will be conducted as design development permits to support studies required by VDOT and FHWA. Typically, these studies are completed following the completion of an EIS ..." Comment: However, in the case of a large complex project where the selected alternative is not clear a framework or roadmap of additional studies and potential NEPA requirements should be included.			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. The Record of Decision will identify the anticipated studies.			

Commenter	Comment #	Comment Type	Name
F 4	F4.7	Federal Agency	Roberto Fonseca Martinez
Section	Page Number	Organization	
4.3 Transportation		Federal Highways Administration	
Comment			
In this DEIS, increases in traffic congestion are treated as impacts of the BRAC move. In some sections, the traffic impacts are downplayed, on the regional level: "In lay terms, what is happening is that when the people stop reporting to Crystal City, Reston, Bethesda, and so on, those offices are filled by other jobs and different people (productions) who report to work in those locations (attractions), and this occurrence draws trips away from the areas surrounding Fort Belvoir. The trips are rebalanced and the effect is not as great as might be perceived by some. This phenomenon is often described as the "bean bag effect. "Adding more trips in the areas surrounding Fort Belvoir pushes trips out of the other areas; this effect is similar to sitting on a bean bag chair and changing its shape. The total volume of the bean bag (total regional trips) does not change, but the shape does.. ." (P. 4-37) "From the regional perspective, implementation would produce a combination of minor (negligible) adverse and beneficial effects." (P. 4-72) "The total number of trips within the region remains fixed as the regional employment total is held constant; it is the redistribution of employment that causes a shift in travel patterns." (P.4-75). For air quality: "Implementing the Preferred Alternative and the realignment of Fort Belvoir would decrease both the number of vehicles and the total VMT within the region. In turn, regional motor vehicle emissions would decrease." (4-1 55) Comment: Based upon the information provided, we cannot confirm the above conclusions. These assumptions may ultimately need to be verified through an update to the MWCOG long range transportation plan and air quality analysis which would include the new land use assumptions and the necessary roadway improvements.			
Response			
The Army has confirmed with MWCOG that the latest planning assumptions associated with the Belvoir BRAC action will be included in the Round 7.1 cooperative forecast for the region. An additional paragraph has been added to Section 4.3.4.2.1 to discuss the vehicle miles traveled and how the VMT goes down for BRAC employees based on the assumed redistribution of residential locations.			

Commenter	Comment #	Comment Type	Name
F 4	F4.8	Federal Agency	Roberto Fonseca Martinez
Section	Page Number	Organization	
4.3 Transportation		Federal Highways Administration	

Comment

"Long-term significant adverse effects would be expected. Implementing the Preferred Alternative, when compared to the No Action Alternative ... would worsen traffic conditions in the immediate vicinity of Fort Belvoir." (P. 4-72) Regarding the shifting of travel patterns to the South to mimic the current distribution at the Fort: "The consequence of the shifting travel patterns to the south is that traffic to Fort Belvoir (including EPG) northbound on 1-95 would represent a larger portion of the overall traffic flow. Current highway facilities to the south would constrain the traffic flows if adequate roadway capacity is not provided." (P. 4-75) For the Preferred Alternative: "The analyses assumed completion of the 1-95 Fourth Lane Project. Even with the completion of the widening project, the hours of congestion on 1-95 are expected to increase by 30 to 45 minutes. The duration of congestion along U.S. Route I would increase by approximately 30 minutes over the No Action Alternative conditions under the Preferred Alternative if there is no widening of U.S. Route 1. Along the Fairfax County Parkway east of 1-95, the duration of congestion would likely increase by an hour." (P. 4-82) "In the areas immediately surrounding EPG, severe congestion lasting 3 to 4 hours would occur if mitigating actions, including transportation improvements, are not taken...Queuing of traffic from the access point off the Fairfax County Parkway adjacent to EPG can be expected to back up onto the 1-95 corridor. This queuing would translate into an extension of the AM congested period by over an hour, up to 2 hours...If the Fairfax County Parkway segment through EPG is not constructed as per the currently funded improvements, then the sole access to EPG will be via Backlick Road. Providing only this single access point would require that work arrivals be spread out over an 11 to 12-hour period, due to limited capacity on Backlick Road." (P. 4-83) "The current approved plan for the Fairfax County Parkway through EPG would yield an access capacity of approximately 2,000 to 3,000 vph, well below the forecasted demand of 5,600-6,200 vph to the EPG site. This demand, if left unserved, would cause severe congestion on roadways surrounding EPG, including 1-95, which would affect the regional traffic through the study area. Additional capacity and access points would be required to mitigate this effect." (P. 4-83) Under Mitigation: "Implementing the Preferred Alternative would result in significant adverse effects to the transportation system with respect to congestion and increased travel time. These effects would lead to reduced employee productivity, higher commuting costs, and degradation of quality of life. These effects would not be limited to personnel at Fort Belvoir. Through commuters and the local community would also be affected." (P. 4-84) The DEIS describes 13 proposed projects to "mitigate" the adverse effects of the BRAC action. No environmental analysis of these projects is provided. Comment: As noted above, based on our review of the DEIS, the NEPA coverage of the roadway improvements identified as potential mitigation is lacking. If your plan is to proceed with additional or follow-on NEPA documents for transportation improvements, an overview of known environmental issues should be included in your plan for subsequent studies.

Response

The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies (including environmental studies) and design work. The timeline will be considered during preparation of the ROD.

Commenter	Comment #	Comment Type	Name
F 4	F4.9	Federal Agency	Roberto Fonseca Martinez
Section	Page Number	Organization	
4.3 Transportation		Federal Highways Administration	

Comment

FHWA is committed to working with the Army to address our concerns. We recognize the substantial attention paid to transportation issues in the document. The 110-page Transportation section in the Affected Environment does a thorough job of analyzing the existing conditions and considers appropriate plans and programs for currently proposed improvements. As noted above, additional consideration needs to be given to the environmental impacts of the needed transportation improvements to ensure that they are in place to serve the staff being relocated to Fort Belvoir. We urge you to include a framework for and commitment to additional studies and NEPA documentation that will be required to implement the necessary transportation improvements. We look forward to working with you on this important project.

Response

The Army looks forward to working with FHWA to developing a framework for additional studies. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.

Commenter	Comment #	Comment Type	Name
F 5	F5.1	Federal Agency	Michael Chezik
Section	Page Number	Organization	
Other		U.S. Department of the Interior	
Comment			
As partial mitigation for this project, the Department recommends completion of pedestrian, bicycling and water trail networks as segments of the Potomac Heritage Scenic Trail between Mount Vernon and the Occoquan National Wildlife Refuge. Our recommendation includes construction of a segment of the Potomac Heritage National Scenic Trail similar in function to the plan completed by the U.S. Army Corps of Engineers in 1996. (See, e.g., Eglin AFB and Avon Park AFR along the Florida National Scenic Trail.) Completion of the network will help to address the increased demand for recreational opportunities resulting from implementation of the BRAC recommendations, as well as providing transportation alternatives in the vicinity of the post. In particular, the network should include a nonmotorized connection to and including the planned U.S. Army Museum, contributing to the network of nationally significant sites in the Trail corridor.			
Response			
Project Number 55523, shown in Table 5-1, is for the first phase of creation of the Potomac Heritage National Scenic Trail at Fort Belvoir. The trail will be included in the upcoming Fort Belvoir Master Plan update as part of that document's Trail Plan, and the project will be analyzed in the Master Plan's NEPA document. Funding is being sought for this work. Fort Belvoir will continue to evaluate the potential for other recreational and nonmotorized transport opportunities. The establishment of the museum will be the subject of additional NEPA analysis.			

Commenter	Comment #	Comment Type	Name
F 5	F5.2	Federal Agency	Michael Chezik
Section	Page Number	Organization	
Other		U.S. Department of the Interior	
Comment			
Because some employees at the post and surroundings areas might utilize walking, jogging or biking as a form of transportation, the Department proposes the addition of a section titled "Non-Motorized Transportation" on page ES-20 within the section heading "ES 8.1 Transportation" and in relevant chapters thereafter. Mitigation would require coordination and planning with Fairfax County agencies, the Metropolitan Washington Council of Governments, and other agencies followed by construction of additional pedestrian and bicycling facilities in the region.			
Response			
The EIS focuses on those elements of the transportation system that are most relevant to the immediate issues at hand. Consideration of the matters referenced in the comment might occur in the future (such as in the Real Property Master Plan that is now under revision).			

Commenter	Comment #	Comment Type	Name
F 6	F6.1	Federal Agency	William Arguto
Section	Page Number	Organization	
Other		EPA Region 3	
Comment			
In accordance with the National Environmental Policy Act of 1969 and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement for Implementation of 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia. As a result of this review, EPA has assigned this Draft Environmental Impact Statement (DEIS) a rating of EC-2 (Environmental Concerns/Insufficient Information), which indicates that we have environmental concerns regarding the proposal and that there is insufficient information in the document to fully assess the environmental impacts of the project. A copy of EPA's ranking system is enclosed for your information.			
Response			
Comment noted. The Army will carefully evaluate and respond to the matters raised by EPA in its comments on the Draft EIS.			

Commenter	Comment #	Comment Type	Name
F 6	F6.2	Federal Agency	William Arguto
Section	Page Number	Organization	
4.2 Land Use		EPA Region 3	
Comment			
<p>The Preferred Alternative land use plan would aggregate land use categories in a way that reflects and supports the evolution in Fort Belvoir’s mission. The proposed land use designations simplify and consolidate the existing 1993 land use categories into other broadly defined categories providing greater flexibility for future development without having to confront compatibility. These designations are Airfields, Community, Industrial, Residential, Training, Professional/Institutional, and Troop.</p> <p>The Community category includes safety clearance, security areas, water areas, wetlands, conservation areas, resource protection areas (RPAs), forest stands, and former training areas. As stated on page 4-19, “At both EPG and South Post, new development and renovations would, with minor exception (e.g. minor wetlands), take into consideration areas currently identified for environmental preservation and conservation.” Page 4-267 states that “Areas designated Outdoor Recreation or Environmentally Sensitive under the 1993 land use plan (except for the SNAs), if changed to Community, might remain as outdoor recreation areas or environmentally protected buffer areas but could be used for purposes less protective of natural vegetation.” Page 4-268 also states that land redesignated as Range/Training could be less protective of natural vegetation than a specific Environmentally Sensitive land use designation. In addition, land use designations of Professional/Institutional or Residential support development which could have adverse consequences on vegetation in an environmental sensitive area.</p> <p>Since the Environmental Sensitive land use category from the 1993 plan would not be carried forth to the revised land use plan, there is concern that this change runs the risk of undermining environmentally sensitive areas that are not necessarily labeled a “high-value resource” but are nonetheless environmentally sensitive. The fear is that the revised land use plan will not allow for sound use of physical and natural resources at the post with respect to future land use requirements. This land use change can only secure protection to the three Special Needs Areas: the Jackson Miles Abbott Wetland Refuge (JMBWR), Accotink Bay Wildlife Refuge (ABWR), and the Forest and Wildlife Corridor. Therefore, environmentally sensitive areas are not protected by the proposed land use plan.</p>			

Response
<p>The Master Planning Technical Manual (MPTM) changed land use category titles to be used by Army master planners. The new land use terminology as it applies to Fort Belvoir is shown in Figure 2-2 in the EIS. Sensitive environmental receptors, natural and cultural resource areas and mitigation established in 1991 BRAC EIS are retained on other GIS data layers and will continue to protect sensitive areas from site-specific project impacts. The combination of all environmental constraints is found in Figure 2-3. This figure includes environmentally sensitive areas as well as operational constraints. The installation uses these constraints to determine future development opportunities and restrictions. Section 2.2.1.2 of the EIS explains the differences between the land use categories analyzed in the EIS versus those presented in the 1993 master plan. The installation’s master plan is in the process of being updated and will require separate NEPA analysis. The land use categories listed in the EIS comport with the land use categories presented in the MPTM. In addition to regulatory protection requirements, environmentally sensitive areas are protected by mitigations identified in environmental assessments and in the 1991 BRAC ROD. For example, the Accotink Bay Wildlife Refuge and Forest and Wildlife Genetic Corridor were designated as sensitive areas with restrictions on development. These protections include Fort Belvoir’s self-designation of environmentally sensitive areas, and sound engineering practices. In addition, the master planning process is also expected to result in the establishment of environmental constraints. Figure 2-3 shows areas that we anticipate will be subject to environmental constraints. These areas exceed those designated as environmentally sensitive in the 1993 master plan. Also, see response to Comment L1.4.</p>

Commenter	Comment #	Comment Type	Name
F 6	F6.3	Federal Agency	William Arguto
Section	Page Number	Organization	
4.7 Water Resources	4-271	EPA Region 3	
Comment			
<p>Page 4-271 states that “Approximate acreages of natural resources that could be directly affected under the proposed action are 21 acres of the Environmental Quality Corridor (EQC), 2 acres of wetlands, 6 acres of riparian buffers, and 14 acres of RPAs.</p> <p>The FEIS should identify the location of the proposed projects and the natural resources that they impact. The specific resource impacted should be identified. A map depicting the proposed projects in relation to the impacted natural resources should also be provided. The impacted wetlands should be identified and the functional value provided. Impacts to wetlands should be avoided or minimized whenever possible. The FEIS should also discuss how the impact to these natural resources will affect the water resources in the impacted areas.</p>			

Response
<p>To assist the reader in understanding the impacts on water resources and other natural resources, Appendix J has been added to the EIS showing proposed project location maps as well as approximate acreages, based on best available information, of impacts on water resources (Table J-2). Section 4.7 text has been updated to reflect the most recent information concerning the proposed alternatives.</p>

Commenter	Comment #	Comment Type	Name
F 6	F6.4	Federal Agency	William Arguto
Section	Page Number	Organization	
4.8 Biological Resources		EPA Region 3	
Comment			
<p>Section 4.8.1.3 identifies Rare Plant Communities that are either very rare or extremely rare ecological communities that exist on Fort Belvoir's Main Post. The FEIS should discuss the potential impacts (if any) to these communities and specify the size of these ecological communities.</p> <p>One area mentioned in this section is a tidal hardwood swamp. It is important to note that forested wetland systems act as natural filters and sediment traps and absorb flood waters. They provide vital ecological functions that are critical to several wetland dependent animal and plant species. This type of wetland system is vulnerable to a variety of human practices, such as agriculture, urbanization, and forestry. Therefore, wetland impacts from human activities should be avoided to the maximum extent practicable and be properly protected. EPA's mandates include the preservation of these environmentally significant resources.</p>			
Response			
<p>Discussions in the EIS of the effects of the proposed alternatives on rare ecological communities have been revised on the basis of the best available information. See Sections 4.8.2.1.2, 4.8.3.1.2, 4.8.4.1.2, and 4.8.5.1.2.</p>			

Commenter	Comment #	Comment Type	Name
F 6	F6.5	Federal Agency	William Arguto
Section	Page Number	Organization	
4.8 Biological Resources		EPA Region 3	
Comment			
<p>The DEIS states that the large amount of development associated with the Preferred Alternative would require the conversion of much vegetated areas on the Main Post and EPG to developed areas. Development would have long-term moderate adverse effects because it could increase habitat fragmentation and reduce habitat connectivity, increase the occurrence of invasive species in fragmented habitats, and could reduce the overall ecological integrity of the installation's natural habitat. Table 4.8-4 lists the vegetative community types and the total approximate acres of projects proposed in the area of the post. However, it is not clear if the approximate acres of projects proposed in the area is equivalent to the approximate acreage of vegetative community impacted. The FEIS should specify where the forest removal is to take place in the designated area of the post, provide the acreage and kind of vegetative community impacted, and discuss if habitat loss has been accounted for with particular attention to impact on sensitive species.</p>			
Response			
<p>Approximate acreages, the best approximations that can be made at this time, of effects on sensitive biological resources, and maps of the locations of projects under the proposed alternatives have been added to the EIS as Appendix J to help the reader understand the effects on biological resources. The text has been updated to reflect the most recent information concerning the proposed alternatives.</p>			

Commenter	Comment #	Comment Type	Name
F 6	F6.6	Federal Agency	William Arguto
Section	Page Number	Organization	
4.8 Biological Resources		EPA Region 3	
Comment			
<p>As stated on page 4-270, "A total of 179 acres of Partners in Flight (PIF) habitat, 8 acres of sensitive flora habitat, and 6 acres of sensitive fauna habitat would be lost under the alternative." Projects proposed on EPG could reduce the quantity of habitat for the following PIF species: field sparrow, prairie warbler, wood thrush, and worm-eating warbler. The small whorled pogonia has been found on the western portion of EPG and it is the only known location of the species in Fairfax County.</p> <p>A project for the South Post, a family travel camp, is proposed for areas identified as occasional-use foraging areas for bald eagles. The family travel camp area is also an area where seeps of the type that support the Northern Virginia well amphipod occur, and indirect impacts on that species could occur from development. Road improvement projects pass through wood turtle habitat.</p> <p>The Endangered Species Act (ESA) provides for the listing of endangered and threatened species of plants and animals as well as the designation of critical habitat for listed species. The ESA prohibits the taking of any listed species without (for federal agencies) an "Incidental Take Statement." The definition of "taking" includes injury and harassment. The ESA also requires federal agencies to exercise their authorities, in consultation with designated agencies (in effect, the U.S. Fish and Wildlife Service and National Marine Fisheries Services as appropriate), to conserve endangered species. It further requires federal agencies to consult with these agencies on any action that may jeopardize the continued existence of any threatened or endangered species, which has been interpreted by regulation to require consultation for any action that "may affect" such species. For actions that may adversely affect species, the regulatory agencies may recommend mitigation. Such mitigation is required if an agency action would otherwise jeopardize the species existence, and it may be required if agency action will result in a take and, therefore, require an incidental take authorization.</p> <p>The FEIS should indicate where the impacted species are in relation to the proposed projects. The most recent state and federal threatened and endangered species coordination letters should be included in the FEIS.</p>			
Response			
<p>The level of analysis in the EIS was not based on design of projects because that step has not yet been completed. Agency coordination letters are included in Appendix B of the EIS. The Army is currently consulting with the USFWS and state natural resources agencies regarding the small whorled pogonia and the bald eagle.</p>			

Commenter	Comment #	Comment Type	Name
F 6	F6.7	Federal Agency	William Arguto
Section	Page Number	Organization	
4.7 Water Resources		EPA Region 3	
Comment			
<p>As noted on page 4-190, "...the placement of fill in association with stream crossings could result in an increase in the topography in the vicinity of the Accotink Creek drainage and its tributaries." The FEIS should discuss what impacts this change in topography may have on drainage (if any). It is requested that the number, size and use of the stream crossings proposed be provided. It is noted on page 4-193 that one new bridge over the Accotink Creek is proposed which would also result in direct impacts to soils associated with the construction of piers and footings. The FEIS should assess the potential impacts to the water quality of the stream and the potential impacts that could result from the stream crossings and bridge. Impacts to biological resources should also be noted. Page 4-191 states that, "Crossings of Accotink Creek ...could require drilling or small amounts of blasting to manipulate the bedrock features adjacent to the creek." Potential impacts from this activity should be addressed in the FEIS.</p>			
Response			
<p>Text has been added to Section 4.7.2.2.2 regarding additional impact analysis for stream crossings. The topography along Accotink Creek is already quite steep; therefore, changes in runoff characteristics as a result of the stream crossings are expected to be negligible. Any blasting that would occur would be of short duration and associated with construction activities covered by an erosion and sediment control plan for compliance with Virginia storm water requirements. Therefore, effects on other resources as a result of the limited amount of blasting that might be necessary is not anticipated.</p>			

Commenter	Comment #	Comment Type	Name
F 6	F6.8	Federal Agency	William Arguto
Section	Page Number	Organization	
4.6 Geology/Soils	4-191	EPA Region 3	
Comment			
<p>Page 4-191 states, "Soil types that could support prime farmlands occur within the project area. However, since the lands within Fort Belvoir are in urban use or otherwise irreversibly committed to other uses, the prime farmland designation does not apply." If there is any farmland in the study area, it should be evaluated and classified. Prime and unique farmland impacted by the project should be delineated regardless of the current state of cultivation. These efforts should be coordinated with the National Resources Conservation Service. Impacts to prime and unique farmland should be avoided. However, if this is not possible the FEIS should explain the implications of developing the prime and unique agricultural land with respect to the Farmland Protection Policy Act as well as describe the mitigation measures for those impacts.</p>			

Response
<p>The Farmland Protection Policy Act (FFPA) is intended to minimize the impact of federal programs on agricultural lands and applies to prime farmland, unique farmland, and farmlands of statewide or local importance. The loss of agricultural use of the lands within Fort Belvoir began in 1912 and continued as the installation expanded before World War I and again in the 1940s. Over the years, some of the lands in question have been previously disturbed in the process of meeting the demands as an EPG and training facility. Therefore, the conversion of the land from farmland to a military training facility occurred well before the passage of the FFPA in 1981. While none of the components of the BRAC action would affect farmland per se, soils that would support both prime farmland and farmlands of statewide importance have been mapped within the project area. Tables 4.6-4 through 4.6-7 have been revised in the final EIS to indicate which facilities under each alternative would affect these soils. Under all alternatives, the majority of construction would occur on urban and cut/fill soils with relatively minor disturbances occurring on soils that could support prime farmland or farmlands of statewide importance.</p>

Commenter	Comment #	Comment Type	Name
F 6	F6.9	Federal Agency	William Arguto
Section	Page Number	Organization	
4.6 Geology/Soils	4-193	EPA Region 3	
Comment			
<p>Page 4-193 states that, "Infrastructure would also include installation of approximately 25,000 linear feet of perimeter fencing, which would require clearing and grubbing of an area approximately 40 feet wide throughout the length of the fence." The FEIS should specify what is being cleared, identifying soils and vegetation.</p>			

Response
<p>Table 4.6-4 as been revised to indicate which soil types would be affected by installing the perimeter fence. Vegetative community losses on EPG listed in Tables 4.8-4 and 4.8-8 include losses from the perimeter fence.</p>

Commenter	Comment #	Comment Type	Name
F 6	F6.10	Federal Agency	William Arguto
Section	Page Number	Organization	
4.12 Utilities		EPA Region 3	
Comment			
<p>This project presents an excellent opportunity to implement the President's Executive Order 13423: Strengthening Federal Environment, Energy and Transportation Management by incorporating energy efficiency into the renovation and construction efforts for this project. Enclosed with this letter is information that EPA recommends the Army consider when planning the renovation/construction phase of this project.</p>			

Response
<p>Requirements of the Energy Policy Act of 2005 (Public Law 109-58-August 2005), Executive Order 13423, and other military policy/requirements have been incorporated into the EIS in the pertinent sections.</p>

Commenter	Comment #	Comment Type	Name
L 1	L1.1	Local Agency	Gerald Connolly
Section	Page Number	Organization	
Other		Fairfax County Board of Supervisors	
Comment			
The DEIS provides little commitment to the best management practices and mitigation measures that will be pursued. This concern is not limited to transportation but extends to a number of issues.			
Response			
The EIS identifies and examines potential mitigation actions. Commitment to them is a matter for the Record of Decision. As noted in Section 4.14, BMPs are already part of the proposed action.			

Commenter	Comment #	Comment Type	Name
L 1	L1.2	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County Board of Supervisors	
Comment			
Transportation is, though, the critical concern, and we would note that the DEIS discusses transportation mitigation measures in terms of efforts that could be pursued rather than efforts that will be pursued. Full funding of the transportation mitigation measures identified in the DEIS prior to occupancy is absolutely critical. An execution plan and timeline for the transportation projects identified should be developed, and funding commitments for transportation mitigation should be demonstrated in the Record of Decision. In addition, the Record of Decision should commit to the development and implementation of a Transportation Demand Management (TDM) plan; this plan should include a strategic plan that details specific actions and trip reductions. The Army should seek funding for a full time position at Fort Belvoir to manage a TDM program.			
Response			
The Army recognizes the need for additional studies. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. Adoption of the traffic demand management program and hiring appropriate staff to manage it will be addressed in the Record of Decision.			

Commenter	Comment #	Comment Type	Name
L 1	L1.3	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County Board of Supervisors	
Comment			
The proximity of EPG and Fort Belvoir to the Franconia-Springfield Metro and VRE station and access to public transportation along the Route 1 corridor could afford opportunities to optimize transit. This DEIS does not commit or address in sufficient detail how the Army would try to optimize the use of transit. This level of development should strive to maximize transit-oriented trips through increased use of bus, rail, and Metro. This could also include a Department of the Army run shuttle service to VRE, Metro station, and retail and commercial establishments in the vicinity of EPG and Main Post.			
Response			
The EIS identifies transit services as part of potential mitigation actions, including shuttle bus services from the Franconia-Springfield Metrorail Station. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required planning efforts, studies and design work.			

Commenter	Comment #	Comment Type	Name
L 1	L1.4	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use		Fairfax County Board of Supervisors	
Comment			
<p>Proposed reclassification of land use categories for the land use plan: the proposal to pursue a comprehensive reclassification of land use categories for the land use plan is being considered outside the context of a more comprehensive Real Property Master Planning process, and the redesignation of land use categories may have potential implications that extend well beyond anything that needs to be considered in support of the BRAC relocations. Of particular note is the proposal to eliminate the "Environmentally Sensitive" land use category, which would appear to have the effect of removing from protection any environmentally sensitive area on the Post that is not afforded regulatory protection. It is also impossible to understand, much less assess the impacts of, the proposed land use redesignations as they relate to potential future development on the Post (e.g., what would be the potential buildout levels of population and employment under the proposed land use designations?) We do not understand why a comprehensive redesignation of land use categories is needed to support the BRAC relocations; we feel that these relocations could be accommodated using the existing land use plan categories, recognizing that these categories would need to be mapped on the Engineer Proving Ground (EPG) site and that some changes in the mapping of these categories on the Main Post may also be needed. We recommend that the land use plan changes that are made through this process be limited to the minimum necessary to accommodate the BRAC relocations. These land use plan changes should apply the existing land use categories, and broader changes to the plan should only be considered through separate master planning and NEPA processes.</p>			
Response			
<p>In its real property Master Planning Technical Manual (MPTM), the Army revamped its land use designations into larger, more flexible categories as listed in Section 2.2.1.2. An action as large as BRAC required incorporation of these new categories into the EIS to determine compliance with the land use plan in the upcoming Master Plan Update. Potential buildout levels will be analyzed in the Master Plan Update and its associated NEPA document.</p> <p>The updated land use plan in the FEIS reclassified land use categories from the 1993 Master Plan in accordance with Army Regulation 210-20 and the MPTM. Environmentally sensitive areas are designated under this new system through an Environmental Resources Assessment (ERA). The ERA analyzes a broad array of data from EISs, Environmental Condition of Property (ECP) reports, Integrated Natural Resource Management Plans (INRMPs), Integrated Cultural Resources Management Plans (ICRMPs), mitigations from RODs, federal, state, and local regulations and requirements, and several ARs including AR 200-1, 200-3, and 200-4. The ERA produces a environmental constraints on development map for environmental areas, which is illustrated in Figure 2-3 in the FEIS. The development constraints map is comprised of more than 19 data layers showing such information as wetlands, habitat, endangered species, cultural resources, landfills, hazardous substances, etc. See nomenclature in Section 4 of the FEIS. The determination of which areas are buildable or not is based on a "summary of opportunities and constraints", which is made up of the ERA, facilities constraints, land use, utilities, transportation networks, airfields, ranges, and training lands. Also see response to Comment F6.2.</p>			

Commenter	Comment #	Comment Type	Name
L 1	L1.5	Local Agency	Gerald Connolly
Section	Page Number	Organization	
Other		Fairfax County Board of Supervisors	
Comment			
<p>The scope of the proposed action, in our view, does not seem to be consistent in all cases with what is needed to accommodate the required BRAC transfers. As noted above, we feel that the proposed revisions to the land use plan exceed what would be needed to accommodate the BRAC actions, and it is our view that any changes to the land use plan that go beyond the minimum changes needed to accommodate BRAC would be best dealt with through a more comprehensive Real Property Master Plan review process (and related review under NEPA).</p>			
Response			
<p>The Army deliberately chose, in its discretion, to update its land use plan for Fort Belvoir as an element supporting BRAC implementation. Other than an amendment in 2002, the land use plan was last revised in 1993 and is deemed outdated for BRAC. Adoption of a revised land use plan is the first step; further revision of the Real Property Master Plan and its subsequent NEPA documentation is underway. This approach provides the Army with optimal, timely information for planning.</p>			

Commenter	Comment #	Comment Type	Name
L 1	L1.6	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA		Fairfax County Board of Supervisors	
Comment			
<p>Scope of the proposed action: In addition, two of the proposed construction and renovation projects (the modernization of barracks and the provision of a family travel camp) seem to bear little, if any, relationship to the recommendations of the BRAC Commission. Regardless of whether or not these are desirable proposals, we question why these proposals are included for consideration within this DEIS instead of separate NEPA processes. Conversely, two projects that would appear to be closely linked to the BRAC-related growth (a shoppette and a physical fitness center at EPG) are not identified as part of the BRAC action but are instead identified as separate projects in the cumulative effects section of the DEIS. We are also concerned that other support services that would be needed to serve the BRAC-related growth do not appear to have been addressed.</p>			
Response			
<p>The barracks modernization and family travel camp projects were included because they are funded and would occur concurrently with BRAC implementation in the same general area. The shoppette and physical fitness center are not included as part of the proposed action because their funding is not yet secured. As that funding becomes available, appropriate NEPA analysis will be performed.</p>			

Commenter	Comment #	Comment Type	Name
L 1	L1.7	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA		Fairfax County Board of Supervisors	
Comment			
<p>Graphical information relating to the options: The information that has been provided regarding the physical layout of facilities and impacts to natural and cultural resources is insufficient to provide a full understanding of the reasons for and implications of these impacts. Information regarding acreages of impacts does not present enough guidance for us to draw clear distinctions among alternatives in terms of natural resource implications. We have asked project consultants for more detailed graphical information and understand that information pertaining to development parcels as they relate to natural resources is forthcoming (and may be provided prior to the April 17 public hearing.</p>			
Response			
<p>The Army believes the level of detail available for describing the projects and their impacts is sufficient to reach sound decisions on the Army's proposals. Further, Appendix J, which contains site-specific impact maps and data, has been added to the EIS, and text in Sections 4.6 (Geology and Soils), 4.7 (Water Resources), 4.8 (Biological Resources), 4.9 (Cultural Resources), and 4.13 (Hazardous Materials and Hazardous Substances) have been updated to reflect and reference the information in Appendix J. In response to this comment, the Army invited county staff to visit the preparer's offices to view this information.</p>			

Commenter	Comment #	Comment Type	Name
L 1	L1.8	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA		Fairfax County Board of Supervisors	
Comment			
<p>Scope of the alternatives: Of the four build alternatives presented, we feel that, from a transportation standpoint, the preferred and City Center alternatives would be preferable to the two options that would concentrate development on the Main Post. Limitations on the ability to improve the Fairfax County Parkway in the vicinity of I-95 and Terminal Road, along with limitations associated with traffic signal spacing along both the same stretch of the Fairfax County Parkway and Richmond Highway, would make any alternative that would concentrate new development on the Main Post problematic. That being said, we do not feel that the scope of the alternatives that has been identified is sufficient. All four of the build alternatives would concentrate development in certain areas. There has been no analysis of an alternative that provides for a more dispersed pattern of development, and all of the alternatives assume that all 9,263 staff and contractors associated with the Washington Headquarters Service relocation must be located in the same place. A hybrid alternative that disperses Washington Headquarters Services (WHS) activities on both the EPG and General Services Administration (GSA) sites but that retains the hospital and other uses on the Main Post should be evaluated. In addition, the EIS should provide guidance as to why the GSA site has not been considered for the location of the hospital, particularly in light of the proximity of this site to the consortia health care university campus.</p>			
Response			
<p>Belvoir New Vision Planners formulated the Army's alternatives for BRAC implementation. The many variables -- NGA, WHS, the hospital, etc: -- allow a large number of possible combinations for siting of units, activities, and agencies on Main Post, EPG, or the GSA site. The Army has a suitable, representative array of options from which a sound result can be obtained. Because the BRAC recommendations direct realignment to Fort Belvoir, and GSA is not part of Fort Belvoir, additional legislation would be needed to allow use of the GSA site.</p>			

Commenter	Comment #	Comment Type	Name
L 1	L1.9	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.4 Air Quality		Fairfax County Board of Supervisors	
Comment			
[T]he DEIS does not consider the impact of air pollution resulting from congestion. It should consider these impacts.			
Response			
Information on the effects of air pollution from congestion is in Section 4.4.2.2.2.			

Commenter	Comment #	Comment Type	Name
L 2	L2.1	Local Agency	Gerald Connolly (via Hyland)
Section	Page Number	Organization	
Other		Fairfax County Board of Supervisors	
Comment			
[equivalent to L1.1] The EIS provides little commitment to the best management practices and mitigation measures that will be pursued. This concern is not limited to transportation, but extends to a number of issues.			
Response			
The EIS identifies and examines potential mitigation actions. Commitment to them is a matter for the Record of Decision. As noted in Section 4.14, BMPs are already part of the proposed action.			

Commenter	Comment #	Comment Type	Name
L 2	L2.2	Local Agency	Gerald Connolly (via Hyland)
Section	Page Number	Organization	
4.3 Transportation		Fairfax County Board of Supervisors	
Comment			
[equivalent to L1.2] Transportation is, though, the critical concern, and we would note that the draft EIS discusses transportation mitigation measures in terms of efforts that could be pursued rather than efforts that will be pursued. Full funding of the transportation mitigation measures identified in the draft EIS, prior to occupancy, is absolutely critical. An execution plan and timeline for transportation projects identified should be developed, and funding commitments for transportation mitigation should be demonstrated in the record of decision. In addition, the record of decision should commit to the development and implementation of a transportation demand management plan. This plan should include a strategic plan that details specific actions and trip reductions, and the Army should seek funding for a full time position for a person to manage the traffic demand management program.			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. A TMP has been identified as a mitigating action. Traffic demand management issues are addressed in Section 4.3.4.4 of the EIS. Adoption of the traffic demand management program and hiring appropriate staff to manage it will be addressed in the ROD. Funding of transportation projects will also be addressed in the ROD.			

Commenter	Comment #	Comment Type	Name
L 2	L2.3	Local Agency	Gerald Connolly (via Hyland)
Section	Page Number	Organization	
4.3 Transportation		Fairfax County Board of Supervisors	
Comment			
[equivalent to L1.3] The proximity of EPG and Fort Belvoir to the Franconia-Springfield Metro and VRE station and access to public transportation along the Route 1 could afford opportunities to optimize transit. This draft EIS does not commit or address in sufficient detail how the Army would try to optimize the use of transit. This level of development should strive to maximize transit oriented trips through increased use of bus, rail, and metro. This could also include a Department of Army run shuttle service to VRE, Metro station, and retailing commercial establishments in the vicinity of EPG and main post.			
Response			
Adoption of the traffic demand management program, hiring appropriate staff to manage it, and transit services (including shuttle services to Metro) will be addressed in the Record of Decision. Funding of these projects will also be addressed in the ROD.			

Commenter	Comment #	Comment Type	Name
L 2	L2.4	Local Agency	Gerald Connolly (via Hyland)
Section	Page Number	Organization	
		Fairfax County Board of Supervisors	
Comment			
<p>[equivalent to L1.4] The proposal to pursue a comprehensive reclassification of land use categories for the land use plan is being considered outside the context of being a more comprehensive real property master planning process, and the re-designation of land use categories may have potential implications that extend well beyond anything that needs to be considered, in support of the BRAC decisions, our relocations. A particular note is the proposal to eliminate the "Environmentally Sensitive" land use category, which would appear to have the effect of removing from protection any environmentally sensitive area on the post that is not afforded regulatory protection. It is also impossible to understand, much less assess the impacts of, the proposed land use redesignations as they relate to potential future development on the Post, for example, what would be the potential build out levels of population and employment under the proposed land use designations. We do not understand why a comprehensive redesignation of land use categories is needed to support the BRAC relocations. We feel that these relocations could be accommodated using the existing land use plan categories, recognizing that these categories would need to be mapped on the engineer "proving" ground site, and that some changes in the mapping of these categories on the Main Post may also be needed. We recommend that the land use plan changes that are made through this process be limited to the minimum necessary to accommodate the BRAC relocations. These land use changes should apply the existing land use categories and broader changes to the Plan should only be considered through separate master planning and NEPA processes.</p>			

Response
<p>The project siting process on Fort Belvoir evaluates both compliance with land use designations and potential other issues with sites. Areas identified as sensitive (i.e., RPAs, wetlands) still retain their regulatory protections. See response to Comment L1.4.</p>

Commenter	Comment #	Comment Type	Name
L 2	L2.5	Local Agency	Gerald Connolly (via Hyland)
Section	Page Number	Organization	
Other		Fairfax County Board of Supervisors	
Comment			
<p>[equivalent to L1.5] The scope of the proposed action, in our view, does not seem to be consistent in all cases with what is needed to accommodate the required BRAC transfers. As noted above, we feel that the proposed revisions to the land use plan exceed what would be needed to accommodate the BRAC actions, and it is our view that any changes to the land use plan that go beyond the minimum changes to accommodate BRAC would be best dealt with through a more comprehensive real property master plan review process, and related review under NEPA.</p>			

Response
<p>The Army deliberately chose, in its discretion, to update its land use plan for Fort Belvoir as an element supporting BRAC implementation. Other than an amendment in 2002, the land use plan was last revised in 1993 and is deemed outdated for BRAC. Further revision of the Real Property Master Plan is underway. This approach provides the Army with optimal, timely information for planning.</p>

Commenter	Comment #	Comment Type	Name
L 2	L2.6	Local Agency	Gerald Connolly (via Hyland)
Section	Page Number	Organization	
DOPAA		Fairfax County Board of Supervisors	

Comment			
<p>[equivalent to L1.6] In addition, two of the proposed construction and renovation projects, the modernization of barracks, and the provision of a family travel camp) seem to bear little, if any, relationship to the recommendations of the BRAC commission. Regardless of whether or not these are desirable proposals, we question why these proposals are included for consideration within this draft EIS, instead of separate NEPA processes. Conversely, two projects that would appear to be closely linked to the BRAC related growth, a shoppette and a physical fitness center in EPG are not identified as part of the BRAC action, but instead, identified as separate projects in the cumulative effects section of the draft EIS. We're also concerned that other support services that would be needed to serve the BRAC related growth do not appear to have been addressed.</p>			

Response
<p>The barracks modernization and family travel camp projects were included because they are funded and would occur concurrently with BRAC implementation. The shoppette and physical fitness center are not included as part of the proposed action because their funding is not yet secured. As that funding becomes available, that project would move forward and appropriate NEPA analysis for the project would be performed.</p>

Commenter	Comment #	Comment Type	Name
L 2	L2.7	Local Agency	Gerald Connolly (via Hyland)
Section	Page Number	Organization	
DOPAA		Fairfax County Board of Supervisors	
Comment			
[equivalent to L1.7] Graphical information relating to the options, this information, the information that has been provided regarding the physical layout of facilities and impacts to natural and cultural resources is insufficient to provide a full understanding of the reasons for and implications of these impacts. Information regarding acreages of impacts does not present enough guidance for us to draw clear distinctions among alternatives in terms of natural resource implications. We have asked the project consultants for more detailed graphical information and understand that information may be forthcoming.			
Response			
The Army believes the level of detail available for describing the projects and their effects is sufficient to reach sound decisions on the Army's proposals. Appendix J contains additional information on project sites. Further, additional GIS and other information has been provided to the commenter.			

Commenter	Comment #	Comment Type	Name
L 2	L2.8	Local Agency	Gerald Connolly (via Hyland)
Section	Page Number	Organization	
DOPAA		Fairfax County Board of Supervisors	
Comment			
[equivalent to L1.8] Scope of the alternatives of the four build alternatives presented, we feel that, from a transportation standpoint, the preferred and city center alternatives would be preferable to the two options that would concentrate development on the main post. Limitations on the ability to improve the Fairfax County Parkway and the vicinity of I-95 and Terminal Road, along with the limitations associated with traffic signal spacing, along both the same stretch of the Fairfax County Parkway and Richmond Highway, would make any alternative that would concentrate new development on the main post problematic. That being said, we do not feel that the scope of the alternatives that has been identified is sufficient. All four of the build alternatives would concentrate development in certain areas. There has been no analysis of an alternative that provides for a more disperse pattern of development, and all of the alternatives assume that all 9,263 staff and contractors associated with Washington Headquarters Service relocation; must be located in the same place. A hybrid alternative that disperses Washington Headquarters Services, activities, and both EPG and the GSA sites, but that retains the hospital and other uses on the main post should be evaluated. In addition, the EIS should provide guidance as to why the GSA site has not been considered for the location of the hospital, particularly in light of the proximity of the site to the Health Care University campus.			
Response			
Belvoir New Vision Planners formulated the Army's alternatives for BRAC implementation. The many variables--NGA, WHS, the hospital, etc. --allow a large number of possible combinations for siting of units, activities, and agencies on Main Post, EPG, or the GSA Site. The Army has a suitable, representative array of options from which a sound result can be obtained. Because the BRAC recommendations direct realignment to Fort Belvoir, and GSA is not part of Fort Belvoir, additional legislation would be needed to allow use of the GSA parcel.			

Commenter	Comment #	Comment Type	Name
L 2	L2.9	Local Agency	Gerald Connolly (via Hyland)
Section	Page Number	Organization	
4.4 Air Quality		Fairfax County Board of Supervisors	
Comment			
[equivalent to L1.9] The DEIS does not consider the impact of air pollution, resulting from congestion, it should consider these impacts.			
Response			
Information on effects of air pollution resulting from congestion is in Section 4.4.2.2.2.			

Commenter	Comment #	Comment Type	Name
L 3	L3.1	Local Agency	Gerry Hyland
Section	Page Number	Organization	
4.3 Transportation		Fairfax County Board of Supervisors	
Comment			
<p>Transportation infrastructure obviously is the county's and my major concern. The minimum BRAC related transportation improvements you have listed would cost over 458 million. Fairfax County's estimates required improvements are closer to one billion, a small difference. Currently, only three of these projects have funding which are inadequate due to Fort Belvoir's proposed BRAC expansion. There is a \$50 million shortfall to widen the Fairfax County Parkway through the EPB, and an \$11 million shortfall to widen Woodlawn Road replacement to four lanes. However, funding and road construction will not alleviate BRAC transportation problems. The draft EIS discusses transportation mitigation measures as a possibility rather than a reality.</p>			

Response
<p>The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD.</p>

Commenter	Comment #	Comment Type	Name
L 3	L3.2	Local Agency	Gerry Hyland
Section	Page Number	Organization	
4.3 Transportation		Fairfax County Board of Supervisors	
Comment			
<p>The EIS needs to include an investment and implementation plan for transportation improvements and a strategic traffic demand management plan that outlines trip reductions. Part of this plan should necessarily include mass transit, especially Metro Rail and Virginia Railway Express facilities to the EPG and south posts, and the final EIS should include details on shuttle service from the Lorton and Franconia Springfield VRE stations.</p>			

Response
<p>Adoption of the traffic demand management program, hiring appropriate staff to manage it, and transit services (including shuttle services to Metro) will be addressed in the Record of Decision. Funding of these projects will also be addressed in the ROD. Use of a shuttle to connect with mass transit is discussed in Section 4.3.4.4.</p>

Commenter	Comment #	Comment Type	Name
L 3	L3.3	Local Agency	Gerry Hyland
Section	Page Number	Organization	
DOPAA		Fairfax County Board of Supervisors	
Comment			
<p>Another way to mitigate the transportation impacts is to move the National GeoSpatial Intelligence Agency and Washington Headquarters Service to the GSA Warehouse site, and I support Supervisor Kaufman's effort to remove the preponderance of BRAC employees over 18,000, within walking distance of Metro and VRE. This is a cost effective smart growth initiative in line with Fairfax County's goals to reduce vehicular traffic and create pedestrian friendly urban communities near mass transit.</p>			

Response
<p>The GSA site is not large enough to accommodate both NGA and WHS. Potential use of the GSA site is included as part of the City Center Alternative, with all WHS personnel being at that location. Because the BRAC recommendations direct realignment to Fort Belvoir, and GSA is not part of Fort Belvoir, additional legislation would be needed to allow use of the GSA parcel.</p>

Commenter	Comment #	Comment Type	Name
L 3	L3.4	Local Agency	Gerry Hyland
Section	Page Number	Organization	
4.2 Land Use		Fairfax County Board of Supervisors	
Comment			
I am concerned, as the Chairman has also indicated, about the reclassification of land use categories in the draft EIS, especially the proposal to eliminate the environmentally sensitive land use category. Running through the center of the EPG is Accotink Creek. The area around Accotink Creek is environmentally sensitive and protected by the Chesapeake Bay Preservation Act and other Fairfax County ordinances. Removal of this land use category could circumvent regulatory protections and open up land areas for future development. Future BRAC rounds may send more agencies and commands to Fort Belvoir, and Fairfax County representatives and staff need to understand how development could occur in environmentally sensitive lands like the southwest area.			
Response			
The project siting process on Fort Belvoir evaluates both compliance with land use designations and potential other issues with sites. Areas identified as sensitive (i.e., RPAs, wetlands along Accotink Creek) still retain their regulatory protections. See the response to Comment L1.4.			

Commenter	Comment #	Comment Type	Name
L 3	L3.5	Local Agency	Gerry Hyland
Section	Page Number	Organization	
4.10 Socioeconomics		Fairfax County Board of Supervisors	
Comment			
Schools, BRAC's impact on the school system will not be fully realized until years after implementation. Over time, as DOD employees transfer to other commands or retire, many new and younger generations of employees will move closer to Fort Belvoir and enroll their children in Fairfax County schools, many of whom will make the Lorton, Laurel Hill area the fastest growing part of Fairfax County their home. Many schools in this area are already overcrowded, including the South County Secondary School which is 500 students over capacity when it opened its doors. Fort Belvoir and the congressional delegation need to help to solve this problem by considering a PPEA to build a south county middle school sooner rather than later.			
Response			
The revised/updated EIS Section 4.10.2.2.2 reflects the estimated student population in the NCR. This section also discusses the Federal Impact Aid Program and how it will operate in this situation.			

Commenter	Comment #	Comment Type	Name
L 3	L3.6	Local Agency	Gerry Hyland
Section	Page Number	Organization	
DOPAA		Fairfax County Board of Supervisors	
Comment			
And finally, a little bit aside from the draft EIS, I want to put in a personal request that we look at the replacement of the DeWitt Hospital in South Post, and that we should coordinate and consider and leverage existing services at the Inova Mount Vernon Hospital, which I believe creates an opportunity to partner government with the private sector, which gives us an opportunity to improve health care services to service members by utilizing Inova's rehabilitation joint replacement and wound healing centers, and possibly to relocate obstructive services at Mount Vernon Hospital. These two facilities, along with the upcoming construction of the Inova Lorton Health clinics, can create a continuum -- a unified continuum of medical provider training and service member care in the Mount Vernon district.			
Response			
Future use of DeWitt Community Army Hospital facility has not been determined. Consideration of a joint venture with a community hospital is beyond the scope of the EIS.			

Commenter	Comment #	Comment Type	Name
L 3	L3.7	Local Agency	Gerry Hyland
Section	Page Number	Organization	
DOPAA		Fairfax County Board of Supervisors	
Comment			
<p>I saw General Abramson in the audience, who is our Executive Director of the Army Historical Foundation. The National Museum for the United States Army, I am happy that we are finally, I think finally deciding on a location. I am very happy, personally, that it is not going to be, I think at the engineering proving grounds site, and alone -- my optimum location, and I'm not alone, would have been to the left of Pence Gate I think the location, "proposed location," I put that in quotes, of the museum of Kingman Road, I think is a major step forward, and I breathe a sigh of relief that finally and maybe it will happen, and again, I hold my breathe, but I think that at least brings it closer to Mount Vernon, and Woodlawn, and Gunston, and other areas of significant historical -- historically significant Mount Vernon.</p>			
Response			
<p>The Army intends to consider locations for the museum using appropriate NEPA analysis. Discussion on the possible museum locations are discussed in Section 5.</p>			

Commenter	Comment #	Comment Type	Name
L 4	L4.1	Local Agency	Dana Kaufman
Section	Page Number	Organization	
4.3 Transportation		Fairfax County Board of Supervisors	
Comment			
<p>First and foremost, the missing leg of the Fairfax County Parkway must be built and must be built now. The project is funded, has been fully funded for a decade. The two mile facilities integral to the ultimate success or failure of the entire BRAC program; it creates a front door for the EPG, while opening up the Richmond Highway corridor to the Springfield area commands, and finally completes what has become Fairfax County's Main Street. Our state and federal partners have, frankly, taken turns being at fault for far too long. The bottom line is that Richmond and the Pentagon must get on with laying the asphalt or we'll all be left stranded.</p>			
Response			
<p>The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD.</p>			

Commenter	Comment #	Comment Type	Name
L 4	L4.2	Local Agency	Dana Kaufman
Section	Page Number	Organization	
DOPAA		Fairfax County Board of Supervisors	
Comment			
<p>The second intergovernmental challenge is getting DoD and the GSA to lower their bureaucracy defense shields and once and for all do away with the half century old wooden relic known as the GSA Warehouses or the Franconia Depot. However one chooses to define the county's future or chooses to promote smart growth in general, preserving low ceiling warehouses next to a regional transportation center is just plain stupid and a waste of tax payer dollars. The Washington Headquarters Service commands coming from Metro accessible locations can remain Metro accessible if the GSA's leaking monuments to inefficiency are leveled and quality offices erected -- I like that gesture, leveled, do that again, beautiful. I like that -- are leveled and quality offices brought in their place. For its parts, the DoD community must find a way to make this work with the GSA and the private sector to expedite it</p>			
Response			
<p>The EIS examines use of the GSA Site as part of the City Center Alternative. Because the BRAC recommendations direct realignment to Fort Belvoir, and GSA is not part of Fort Belvoir, additional legislation would be needed to allow use of the GSA parcel.</p>			

Commenter	Comment #	Comment Type	Name
L 4	L4.3	Local Agency	Dana Kaufman
Section	Page Number	Organization	
Other		Fairfax County Board of Supervisors	
Comment			
We also need a firm understanding of where Fort Belvoir is ultimately heading. At the purest level, this entire BRAC process is being undertaken completely backwards as there is no up-to-date future plan for the entirety of Belvoir. We're focusing on the immediate, but we have yet to lay out what will happen and adopt it over time. Sooner rather than later, we need a new master plan approved and in place for the sake of both the Army and the county.			
Response			
The Army is proceeding in an orderly and prudent manner to determine the future course of Fort Belvoir. Adoption of an updated land use plan is the first step in that process. Further revision of the post's Real Property Master Plan is underway.			

Commenter	Comment #	Comment Type	Name
L 4	L4.4	Local Agency	Dana Kaufman
Section	Page Number	Organization	
4.3 Transportation		Fairfax County Board of Supervisors	
Comment			
I also have received a copy of the letter from the head of Federal Highway Administration to Chairman Connolly, and he talks about the letter from FHWA, addresses the Richmond Highway and Telegraph Road connector through Belvoir. What most of us know is the Woodlawn replacement road, and I quote from the letter, "the availability of funding for the four lane connector road is critical if a four lane facility is to be completed and open to the public in 2010." Ladies and gentlemen, we are currently \$34 million short of building a four lane. We have the dollars to do it as a two, but we've got to get those remaining dollars or else we'll have a ribbon cutting in 2010, stopping the traffic and we'll come back a couple of days later and that same traffic will still be there. So it needs to be four lanes from the start, and a section of Telegraph Road from Beulah to Old Telegraph has to be widened at the same time as an integral component.			
Response			
The Woodlawn Connector Road is not part of this proposed action, had its own NEPA process, and is identified in the EIS as a cumulative project in Section 5. The travel demand forecasts from that study showed that a 2-lane facility would be able to accommodate the forecasted traffic volumes.			

Commenter	Comment #	Comment Type	Name
L 5	L5.1	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA		Fairfax County - multiagency letter & attachments	
Comment			
We recognize that the Defense Base Realignment and Closure Commission recommendations are binding and that the Army is obligated to complete the relocations identified for Fort Belvoir by September 15, 2011. We would prefer to see a reduced scope of the proposed action as well as a greater amount of time to: (1) link the BRAC actions more comprehensively to master planning efforts for the post; (2) evaluate how the BRAC relocation mandates can best be accommodated; and (3) ensure that appropriate best management practices and mitigation measures will be funded and programmed so that there is no question that impacts will be mitigated to the extent practicable in advance of employee relocations. The BRAC relocations will be one of the most significant land use actions in the history of Fairfax County, and the time frame that has been imposed on you to implement this action is not sufficient to address in a comprehensive, thorough, collaborative manner the large number of issues that need to be resolved. Please be assured that we recognize this and that the extent and nature of our comments are not intended to denigrate the considerable efforts of Fort Belvoir and its consultants but are instead indicative of the shortcomings of the BRAC process and the complexity of the Army's mandate. We present our concerns, comments, and suggestions with hopes that we can work together during the remainder of the National Environmental Policy Act (NEPA) process and after this process to identify mutually agreeable solutions to the many issues that this action raises. I offer the assistance of County staff to work collaboratively with the Army and its consultants in order to address our concerns.			
Response			
The Army recognizes the challenges inherent in implementing BRAC and appreciates the county's sentiments concerning the magnitude of the proposals. Without legislative relief, the Army must complete the realignment on time and is planning accordingly.			

Commenter	Comment #	Comment Type	Name
L 5	L5.2	Local Agency	Gerald Connolly
Section	Page Number	Organization	
Other		Fairfax County - multiagency letter & attachments	
Comment			
The DEIS provides little commitment to the best management practices and mitigation measures that will be pursued. As outlined in our detailed comments, this concern is not limited to transportation but extends to a number of issues. [like L1.1]			
Response			
The EIS identifies and examines potential mitigation actions. Commitment to them is a matter for the Record of Decision. As noted in Section 4.14, BMPs are already part of the proposed action.			

Commenter	Comment #	Comment Type	Name
L 5	L5.3	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County - multiagency letter & attachments	
Comment			
Transportation is, though, the most critical concern, and we would note that the DEIS discusses transportation mitigation measures in terms of efforts that could be pursued and not efforts that will be pursued. Full funding of the transportation mitigation measures identified in the DEIS prior to occupancy is critical. An execution plan and timeline for the transportation projects identified must be developed, and funding commitments for transportation mitigation must be demonstrated in the Record of Decision. In addition, the Record of Decision should commit to the development and implementation of a Transportation Demand Management (TDM) plan; this plan should include a strategic plan that details specific actions and trip reductions. The Army should seek funding for a full time position at Fort Belvoir to manage a TDM program. [like L1.2]			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD. Adoption of the traffic demand management program and hiring appropriate staff to manage it will be addressed in the Record of Decision.			

Commenter	Comment #	Comment Type	Name
L 5	L5.4	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County - multiagency letter & attachments	
Comment			
The proximity of EPG and Fort Belvoir to the Franconia-Springfield Metro and VRE station and access to public transportation along the Route 1 corridor could afford opportunities to optimize transit. This DEIS does not commit or address in sufficient detail how the Army would try to optimize the use of transit. This level of development should strive to maximize transit oriented trips through increased use of bus, rail, and Metro. This could also include a Department of the Army run shuttle service to VRE, Metro station, and retail and commercial establishments in the vicinity of EPG and Main Post. [like L1.3]			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD. Use of a shuttle to connect with mass transit is discussed in Section 4.3.4.4.			

Commenter	Comment #	Comment Type	Name
L 5	L5.5	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use		Fairfax County - multiagency letter & attachments	
Comment			
<p>The proposal to pursue a comprehensive reclassification of land use categories for the land use plan is being considered outside the context of a more comprehensive Real Property Master Planning process, and the redesignation of land use categories may have potential implications that extend well beyond anything that needs to be considered in support of the BRAC relocations. Of particular note is the proposal to eliminate the “Environmentally Sensitive” land use category, which would appear to have the effect of removing from protection any environmentally sensitive area on the Post that is not afforded regulatory protection. It is also impossible to understand, much less assess the impacts of, the proposed land use redesignations as they relate to potential future development on the Post and the implications of this potential development (e.g., What would be the potential buildout levels of population and employment under the proposed land use designations? What would be the implications to roads, schools, other public facilities and utilities?) We do not understand why a comprehensive redesignation of land use categories is needed to support the BRAC relocations; we feel that these relocations could be accommodated using the existing land use plan categories, recognizing that these categories would need to be mapped on the Engineer Proving Ground (EPG) site and that some changes in the mapping of these categories on the Main Post may also be needed. Since the update of the Real Property Master Plan for Fort Belvoir will not be completed until 2008 at the earliest, it is imperative that the land use plan changes that are made through this process be limited to the minimum necessary to accommodate the BRAC relocations. These land use plan changes should apply the existing land use categories, and broader changes to the Real Property Master Plan should only be considered through separate master planning and NEPA processes. [equivalent to L1.4]</p>			
Response			
<p>The project siting process on Fort Belvoir evaluates both compliance with land use designations and potential other issues with sites. Areas identified as sensitive (i.e., RPAs and wetlands) still retain their regulatory protections. See the response to Comment L1.4.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.6	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA		Fairfax County - multiagency letter & attachments	
Comment			
<p>The scope of the proposed action, in our view, does not seem to be consistent in all cases with what is needed to accommodate the required BRAC transfers. For example, two of the proposed construction and renovation projects (the modernization of barracks and the provision of a family travel camp) seem to bear little, if any, relationship to the recommendations of the BRAC Commission. Regardless of whether or not these are desirable proposals, we question why these proposals are included for consideration within this EIS instead of separate NEPA processes. Conversely, two projects that would appear to be closely linked to the BRAC-related growth (a shoppette and a physical fitness center at EPG) are not identified as part of the BRAC action but are instead identified as separate projects in the cumulative effects section of the DEIS. As noted in our detailed comments, we are also concerned that other support services that would be needed to serve the BRAC-related growth do not appear to have been addressed as part of this EIS. [equivalent to L1.6]</p>			
Response			
<p>The barracks modernization and family travel camp projects were included because they are funded and would occur concurrently with BRAC implementation. The shoppette and physical fitness center are not included as part of the proposed action because their funding is not yet secured. As that funding becomes available, appropriate NEPA analysis will be performed.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.7	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA		Fairfax County - multiagency letter & attachments	
Comment			
<p>The information that has been provided regarding the physical layout of facilities and impacts to natural and cultural resources is insufficient to provide a full understanding of the reasons for and implications of these impacts. Information regarding acreages of impacts does not present enough guidance for us to draw clear distinctions among alternatives in terms of natural resource implications. We would be interested in reviewing more detailed graphical information pertaining to development envelopes and natural resources than what has been provided in the DEIS. [equivalent to L1.7]</p>			
Response			
<p>The Army believes the level of detail available for describing the projects and their effects is sufficient to reach sound decisions on the Army's proposals. Further, Appendix J, which contains site-specific impact maps and data, has been added to the EIS, and text in Sections 4.6 (Geology and Soils), 4.7 (Water Resources), 4.8 (Biological Resources), 4.9 (Cultural Resources), and 4.13 (Hazardous Materials and Hazardous Substances) have been updated to reflect and reference the information in Appendix J.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.8	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA		Fairfax County - multiagency letter & attachments	
Comment			
<p>Of the four build alternatives presented, we feel that, from a transportation standpoint, the preferred and City Center alternatives would be preferable to the two options that would concentrate development on the Main Post. Limitations on the ability to improve the Fairfax County Parkway in the vicinity of I-95 and Terminal Road, along with limitations associated with traffic signal spacing along both the same stretch of the Fairfax County Parkway and Richmond Highway, would make any alternative that would concentrate new development on the Main Post problematic. That being said, we do not feel that the scope of the alternatives that has been identified is sufficient. All four of the build alternatives would concentrate development in certain areas. There has been no analysis of an alternative that provides for a more dispersed pattern of development, and all of the alternatives assume that all 9,263 staff and contractors associated with the Washington Headquarters Service relocation must be located in the same place. A hybrid alternative that disperses Washington Headquarters Services (WHS) activities on both the EPG and General Services Administration (GSA) sites but that retains the hospital and other uses on the Main Post is our preferred alternative—we wish to stress the importance of this approach to accommodating the BRAC relocations and feel that the Army should strive to incorporate the GSA site into its preferred alternative. At a minimum, this approach should be evaluated in the EIS. In addition, the EIS should provide guidance as to why the GSA site has not been considered for the location of the hospital, particularly in light of the proximity of this site to the consortia health care university campus, and the potential opportunities that INOVA Mount Vernon Hospital may provide in supporting the post and the relocation of medical care functions from the Walter Reed Medical Center. [equivalent to L1.8]</p>			
Response			
<p>Belvoir New Vision Planners formulated the Army's alternatives for BRAC implementation. The many variables--NGA, WHS, the hospital, etc.--allow a large number of possible combinations for siting of units, activities, and agencies on Main Post, EPG, or the GSA Site. The Army has a suitable, representative array of options from which a sound result can be obtained. The EIS examines use of the GSA site as part of the City Center Alternative. Because the BRAC recommendations direct realignment to Fort Belvoir, and the GSA site is not part of Fort Belvoir, additional legislation would be needed to allow use of the GSA site.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.9	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.4 Air Quality		Fairfax County - multiagency letter & attachments	
Comment			
<p>The DEIS suggests that regional vehicle miles traveled (VMT) will be reduced due to a net reduction of 1,700 employees from the region as a result of the BRAC actions, and that this reduction in VMT will, in turn, result in an air quality benefit (in terms of motor vehicle emissions). We take issue with this conclusion and feel that it is unsubstantiated. Even if VMT was to decrease as a result of BRAC (a conclusion that we do not support), VMT is not the sole determinant of air pollutant emissions from motor vehicles; traffic congestion plays a key role as well. The EIS does not take into consideration and include an analysis of the increased production of O3 (ozone/smog) or PM2.5 (fine particulate matter/soot) that will likely result from the significant increase in local traffic on already congested roadways and in congested intersections (in addition to emissions from construction equipment and any new air pollutant sources relating to the BRAC actions). Such an analysis is critical for any final conformity determination to ensure that the BRAC action does not degrade air quality; the region's air quality currently is in nonattainment of O3 and PM2.5 standards. In addition, an O3 and PM2.5 hot spot analysis may be required and should be included as part of the EIS to determine what impacts, if any, each alternative would have on local O3 and PM2.5 concentrations. The analysis should consider various levels of implementation of transportation mitigation measures.</p> <p>The EIS should clarify whether additional emissions from mobile sources (emissions from motor vehicle trips associated with the new employees as well as emissions from construction activity) are accounted for under the General Conformity Rule. The proposed alternative BRAC actions should also be included in the 8-hour O3 and PM2.5 State Air Quality Implementation Plans (SIP) that are currently under development.</p>			
Response			
<p>Information on mobile sources of air emissions appear in Section 4.4.2.2 and Appendix E.1 Sections 3.1.1.2 and 3.1.3.2. In particular, issues relating to ozone and PM2.5 were addressed. Additional text was included Section 4.4.1.5 to clarify the criteria used to determine need (or lack thereof) for a PM2.5 or ozone hot spot analysis or monitoring. Table 4.3-17 in section 4.3.4.2.1 of the EIS demonstrates a reduction in vehicle miles traveled. In addition, The Army has confirmed with MWCOG that the latest planning assumptions associated with the Belvoir BRAC action will be included in the Round 7.1 cooperative forecast for the region. Information on the regional planning process and its relationship to the preferred alternative appear in Appendix E.1 Section 3.3.2.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.10	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.10 Socioeconomics		Fairfax County - multiagency letter & attachments	
Comment			
<p>The DEIS does not adequately examine impacts to existing public park and recreation levels of service; local-serving public parks in the Mount Vernon and Lee Districts are already deficient in their ability to provide athletic facilities, playgrounds and courts, and this shortfall will be aggravated by the BRAC relocations. The 2003 Defense Authorization Act committed to the dedication of a 135-acre portion of the western EPG area to the Fairfax County Park Authority. The proposed concentration of new development at the EPG site heightens the need for this dedication, as recreational facilities on this site would provide benefits to both the federal employees who would be relocated to the area and the public at large.</p>			
Response			
<p>The legislative authority for conveyance in Public Law 107-314 (the National Defense Authorization Act for FY2003), Section 2830, states that the Army "may" convey 135 acres at EPG. As stated in a letter from the Army to Mr. Harold Strickland, Chairman, Fairfax County Park Authority, dated September 27, 2006, the Army decided not to exercise this authority. Section 4.10.2.2, subsection "Shops, Services, and Recreation," was revised to reflect long-term minor adverse impacts on off-post parks and recreation. Fort Belvoir's upcoming Master Plan Update and associated NEPA documentation will provide information about the installation's trails and potential incorporation into regional trail systems.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.11	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.10 Socioeconomics		Fairfax County - multiagency letter & attachments	
Comment			
<p>The DEIS identifies a projected increase of 4,340 children in Fairfax County as a result of BRAC, with an increase in school age children of 3,258. The Fairfax County Public School system has identified an impact of \$77.1 million to address the anticipated facility costs to accommodate the additional enrollment beyond what the school system already has the capacity to address (see an April 27, 2007, letter from Jack D. Dale, Superintendent of Schools, and details within Section H of Attachment A within these comments). This is a significant impact that needs to be addressed. Funding is needed to offset the cost of additional school facilities that would be required as a result of the BRAC relocations.</p>			
Response			
<p>The revised/updated EIS Section 4.10.2.2.2 reflects the estimated student population in the NCR. This section also discusses the Federal Impact Aid Program and how it will operate in this situation.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.12	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.8 Biological Resources		Fairfax County - multiagency letter & attachments	
Comment			
<p>We thank Fort Belvoir for its sensitivity to biological resources in its planning efforts to date and note the discussions within the DEIS of wildlife and wetland refuges, the Forest and Wildlife corridor, and rare, threatened and endangered species. We commend Fort Belvoir for sensitivity to the discovery of the small whorled pogonia on the EPG property and for efforts to protect this species. However, the DEIS identifies a loss of tree canopy that has the potential to significantly impact overall tree canopy levels in Fairfax County and to disrupt the delivery of ecological, environmental and socioeconomic benefits that the tree cover is delivering to the community at large, and it is not clear from the DEIS what Fort Belvoir's policy is regarding restoration of this resource and how this policy will be applied to the BRAC actions. The tree canopy that would be removed to accommodate new development (even where in an early/mid successional stage) should be restored via reforestation and landscape tree planting, and a commitment should be made to the preparation and implementation of a tree restoration plan. Fort Belvoir has long had a tree replacement policy (we understand that replacements have been pursued at a 3:1 ratio) and we feel that there is a need for the EIS to confirm and perhaps strengthen this policy as it is applied to the BRAC actions, particularly in light of air quality concerns noted above. Tree replacement efforts should be pursued for all clearing, even of trees that are less than four inches in diameter at breast height.</p>			
Response			
<p>Compliance with Fort Belvoir's tree replacement policy is incorporated in the EIS as a BMP in Section 4.8.2.5.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.13	Local Agency	Gerald Connolly
Section	Page Number	Organization	
Other		Fairfax County - multiagency letter & attachments	
Comment			
The DEIS presents a series of best management practices and/or mitigation measures for many of the theme areas but often does not present these ideas as firm commitments; rather, many of these ideas are presented as "potential" actions or actions that "can be considered" to reduce impacts. The EIS should clearly identify commitments that will be made to minimize and mitigate for adverse impacts.			
Response			
Section 4.14 provides that best management practices are "already part of the proposed action." Commitment to specified mitigation actions will be made in the Record of Decision, subject to all appropriate considerations of efficacy, feasibility, and availability of funding.			

Commenter	Comment #	Comment Type	Name
L 5	L5.14	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County - multiagency letter & attachments	
Comment			
Transportation--General - Full funding of the transportation mitigation measures identified in the DEIS prior to occupancy. This should include a strategy, plan, schedule, and financial commitments for implementation of the transportation mitigations measures. -Transportation improvements should be provided and appropriately phased in order to correct transportation deficiencies associated with current development at Fort Belvoir and to achieve an acceptable level of service on the transportation network in support of existing and new development. - At a minimum, the Army should fund and construct the improvements listed under section 4.3.3.2 (page 4-63)--Fort Belvoir Main Post Roadway Network. Under this section a new access control point to serve North Post is mentioned on Route 1. This new control point and access to Fort Belvoir (to both South and North Post) should be provided with a grade separated interchange. - As more detailed operational analysis studies are conducted, additional transportation mitigation measures may be needed. These additional improvements developed with more detailed analysis should be included in the overall transportation mitigation plan. - The Army should develop a plan for undertaking Environmental Assessments or Environmental Impact Statements for transportation mitigation projects. - Of particular note, the section of the Fairfax County Parkway through the Engineer Proving Ground (EPG) should be constructed to its ultimate section (six lanes) as shown on the Comprehensive Plan.			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.			

Commenter	Comment #	Comment Type	Name
L 5	L5.15	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County - multiagency letter & attachments	
Comment			
Transportation--Roads • Development of a connection between I-95 northbound general purpose lanes to the westbound Fairfax County Parkway. The DEIS (page 4-85) indicates a mitigation measure to reconstruct the I-95/Fairfax County Interchange. This measure only addresses improved access for the HOV movement. (It should also be noted that this interchange will also need to accommodate the HOT lane project.) • Funding and construction of an additional grade-separated connection between the North and South Post areas over Richmond Highway to improve traffic flow and reduce backups at the existing entrance gates. • Installation of Uninterruptible Power Supplies (UPS) to select traffic signals in the area as described in section L of this attachment.			
Response			
Clarification was added that reconstruction will include other improvements as well, not only limited to a new HOV connection-the original intent was whole interchange improvements. The issue of UPS is not a DoD issue; it is between VDOT, the owner, and the County.			

Commenter	Comment #	Comment Type	Name
L 5	L5.16	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County - multiagency letter & attachments	
Comment			
Transportation--Transit Optimization of transit-oriented trips through measures such as: <ul style="list-style-type: none"> o Provision of shuttle service from the Franconia-Springfield Metrorail station and the Lorton VRE station to EPG and the Main Post. o Provision of shuttle service to retail/commercial areas that are proximate to the EPG site and the Main Post. o Provision of an on-base circulator. o Provision of shuttle service to the Hospital and/or Pentagon. o Provision of pedestrian connections to connect EPG and Main Post with facilities (for example bus shelters) that would encourage transit use. • Provision of increased transit service to the EPG from the I-95 corridor via the planned HOT lane.			
Response			
Adoption of the traffic demand management program and hiring appropriate staff to manage it, as well as transit services, will be addressed in the Record of Decision. Funding of these projects will also be addressed in the ROD. Use of a shuttle to connect with mass transit is discussed in Section 4.3.4.4.			

Commenter	Comment #	Comment Type	Name
L 5	L5.17	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.10 Socioeconomics		Fairfax County - multiagency letter & attachments	
Comment			
Nonmotorized Transportation <ul style="list-style-type: none"> • Provision of trails consistent with the county’s adopted Trails Plan, including the construction of a stream valley trail along Accotink Creek. • Provision of trails to link the EPG site to the Cross County Trail • Development of a non motorized transportation plan to mitigate the adverse impacts on the transportation infrastructure. • Completion, between Mount Vernon and the Occoquan National Wildlife Refuge, of a pedestrian, bicycling and water trail network as segments of the Potomac Heritage National Scenic Trail. • Provision of pedestrian and bicycle connections between on-post and/or near-post housing and on-site employment areas. • Design of new buildings to accommodate bicycle commuting (e.g., secure parking facilities, locker and shower facilities). • Identification of mechanisms through which new trails will be funded and constructed. 			
Response			
Trails are addressed in cumulative effects section of the EIS. A trail plan is planned to be included in the upcoming Fort Belvoir Master Plan Update.			

Commenter	Comment #	Comment Type	Name
L 5	L5.18	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County - multiagency letter & attachments	
Comment			
Transportation Demand Management Development and implementation of an effective Transportation Demand Management (TDM) program. Goals should be established for specific percentage reductions in single-occupant vehicle usage. Ridesharing, carpooling, van pooling, bus, VRE, Metro, establishment of park and ride/transit facilities, and limiting available parking are just some of the methods that can be incorporated into an effective TDM program. To ensure the success of this program and maintain a firm commitment for implementation, Fort Belvoir should seek a full time position to manage a comprehensive and aggressive TDM program.			
Response			
Adoption and funding of the traffic demand management program and hiring appropriate staff to manage it will be addressed in the Record of Decision.			

Commenter	Comment #	Comment Type	Name
L 5	L5.19	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.10 Socioeconomics		Fairfax County - multiagency letter & attachments	
Comment			
Emergency Services Establishment of a coordination process with Fairfax County emergency services personnel through which population increases in the Fort Belvoir area will be monitored over time so that necessary adaptations can be made to ensure that emergency service delivery will be maintained within appropriate coverage and response times.			
Response			
Fort Belvoir's Directorate of Emergency Services coordination with Fairfax County and other county and city emergency services departments will continue as it has in the past. Fort Belvoir will continue to be a partner in the Northern Virginia Emergency Services Mutual Response Agreement. The personnel affected by the BRAC action are already living in the National Capital Region (NCR). The Fort Belvoir BRAC action would not require federal employees assigned to Fort Belvoir to relocate. It was reasonable to assume that some personnel might choose to relocate within the NCR for purposes of their commute to Fort Belvoir. The estimated population changes associated with these relocations are provided in Tables 4.10-10 and 4.10-11 of the EIS.			

Commenter	Comment #	Comment Type	Name
L 5	L5.20	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.10 Socioeconomics		Fairfax County - multiagency letter & attachments	
Comment			
Schools Funding to offset the cost of the additional school facilities required as a result of the BRAC relocations. Specifically, to address the total impact of 3,258 school aged children (if all of these children attend public schools) will require the equivalent of 1.95 elementary schools (900 capacity), 0.4 new middle school (1,250 capacity) and 0.4 new high school (2,500 capacity) for a projected facilities cost of \$131.25 million. Adjusting this need against the existing capacity available in the area eliminates the high school need and reduces the middle school need to 0.32 new middle school buildings. The adjusted cost for additional middle and elementary school facilities after using all available capacity is \$77.1 million.			
Response			
The Army is committed to providing support to FCPS within existing funding support mechanisms, i.e., the Federal Impact Aid Program. Public schools in the National Capitol Region (NCR) are operating beyond capacity is a preexisting condition due to strong regional population growth. Fairfax County and the NCR are forecast to continue to have strong population growth, even without the BRAC action. The Fort Belvoir BRAC action would not require anyone to move. The BRAC action would only relocate jobs within the NCR. Because of this, some persons already living within the NCR whose jobs would be affected by the BRAC action might choose to relocate to Fairfax, Prince William, or other cities or counties in the region for the purpose of improving their commute to Fort Belvoir. The vast majority of these persons would be federal civilian employees and contractors. For Fairfax County, the estimated population change associated with these relocations would be less than one percent of Fairfax County's 2010 population forecast. These persons would be employed, tax-paying citizens who would buy or rent property in the community in which they live, and their tax dollars would support public services. There are many factors contributing to Fairfax County's continued strong population growth, and the personnel relocating to Fort Belvoir would represent only a small portion of that growth. While local effects would be expected to be minor to moderate in some areas, potential population relocation to Fairfax County associated with the BRAC action would regionally contribute to but not significantly increase the already projected job and population growth.			

Commenter	Comment #	Comment Type	Name
L 5	L5.21	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.8 Biological Resources		Fairfax County - multiagency letter & attachments	
Comment			
Land Use •The retention of a vegetated buffer at least 100 feet in width along the northern boundary of EPG, to be supplemented with additional landscaping as needed, is important to provide an effective transition to the low density residential areas to the north of the EPG site.			
Response			
The retention of a buffer along the northern boundary of EPG is incorporated into site designs, and the widest practicable buffer will be retained.			

Commenter	Comment #	Comment Type	Name
L 5	L5.22	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.8 Biological Resources		Fairfax County - multiagency letter & attachments	
Comment			
<p>Biological Resources</p> <ul style="list-style-type: none"> •Protection of all environmentally sensitive areas on the Main Post and EPG site, including minimization of encroachments into Environmental Quality Corridors (EQCs)—this would include a commitment to designing road and utility crossings of EQCs in a manner that will minimize disturbance associated with these crossings. •Dedication of the Accotink Creek EQC to the Fairfax County Park Authority. •Minimization of clearing of trees through sensitive design and construction efforts •Reforestation and landscape tree planting efforts that will be sufficient to restore the tree canopy that will be removed (including early successional areas) to support the proposed development and associated infrastructure. Ideally, a tree canopy restoration plan would be developed that displays graphically the areas within which tree canopy would be restored. Clear references to tree replacement commitments should be made—Fort Belvoir’s tree replacement policy should be confirmed and perhaps strengthened as it is applied to the BRAC actions. •Wetland mitigation efforts that will occur as close to the source of impacts as possible and, if possible, within the same watersheds as the impacts. 			
Response			
<p>Most of the suggestions in the comment were incorporated into the EIS in Section 4.8.2.5 as BMPs that include permit conditions, compliance with Fort Belvoir natural resources management policies, and modern construction practices. The Army will retain control of the Accotink Creek EQC for security purposes.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.23	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.7 Water Resources		Fairfax County - multiagency letter & attachments	
Comment			
<p>Water Resources</p> <ul style="list-style-type: none"> •Stormwater management measures that will, at a minimum, be consistent with county requirements regarding stormwater management, Chesapeake Bay Preservation Areas, Floodplain Regulations, Erosion and Sediment Control requirements and adequate outfall. Floodplain elevations should not be raised as a result of the proposed development. If stormwater management concepts are not presented in the Final EIS, a commitment is needed to ensure that stormwater management facilities will not create significant additional environmental impacts beyond what is described in the DEIS (particularly in terms of vegetative communities, RPAs, EQCs and wetlands). We request Fort Belvoir to share stormwater management plans with the county once these plans are developed and to pursue best management practices that exceed state and local requirements as identified on page 4-233 of the DEIS. •Mitigation of RPA impacts through the establishment of vegetated buffer areas elsewhere on the post (or on nearby sites if there is insufficient restoration capacity on-post) at least equal to the areas of encroachment. 			
Response			
<p>As noted in the response to Comment L5.99, best management practices for stormwater impacts and management plans are addressed in the DEIS to an adequate level of detail. BMPs typically would be an inherent part of project design and implementation, and their funding would be included in general project costs. The Army would comply with all relevant and applicable federal, state, and local requirements to help ensure the Army’s proper stewardship of its resources.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.24	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources		Fairfax County - multiagency letter & attachments	
Comment			
Cultural Resources •Provision of an archaeological survey of the GSA site. •Development, as required by Section 106 of the National Historic Preservation Act, of a Programmatic Agreement with consulting parties to include representatives of all identified cultural resources and by-right consulting parties (e.g., Fairfax County Park Authority and Fairfax County Government staff). •Interpretation of any cultural resources including brochures, signage, exhibits, Web sites, etc.			
Response			
The programmatic agreement being developed by Fort Belvoir and the Section 106 consultation for individual projects would determine what efforts for identification of historic properties and mitigation of adverse effects is appropriate for each project. As stated in Sections 4.9.1.2.4, 4.9.2.3.2, and 4.9.2.3.3, development of the PA and Section 106 consultation for individual projects will be conducted in consultation with the Virginia SHPO and interested parties. The Army invites you to be included in the consultation process. No change was made to the text.			

Commenter	Comment #	Comment Type	Name
L 5	L5.25	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.10 Socioeconomics		Fairfax County - multiagency letter & attachments	
Comment			
Parks and Recreation •Dedication of the 135-acre portion of the western EPG area to the Fairfax County Park Authority consistent with the 2003 Defense Authorization Act. In light of the fact that the DEIS does not identify this as an area needed to support the BRAC actions, this prior federal commitment to Fairfax County should be honored. •Construction of recreational facilities on the western EPG area to help offset demand created by the new development associated with the BRAC action.			
Response			
The legislative authority for conveyance in Public Law 107-314 (the National Defense Authorization Act for FY2003), Section 2830, states that the Army "may" convey 135 acres at EPG. As stated in a letter from the Army to Mr. Harold Strickland, Chairman, Fairfax County Park Authority, dated September 27, 2006, the Army decided not to exercise this authority. Construction of recreational facilities on EPG is addressed in Section 5, Cumulative Effects.			

Commenter	Comment #	Comment Type	Name
L 5	L5.26	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.4 Air Quality		Fairfax County - multiagency letter & attachments	
Comment			
<p>Air Quality</p> <ul style="list-style-type: none"> •Provision of necessary analyses to demonstrate conformance with general conformity air quality requirements (we do not feel that this has been done yet). •Identification of air quality control measures that will be funded and implemented (these can be the transportation mitigation measures noted earlier). •Monitoring of intersections before and after implementation of BRAC actions to identify potential hot spots for ozone and PM2.5 related to the BRAC actions, and identification of contingency measures that can be taken if impacts of air quality concern are identified as a result of the monitoring. 			
Response			
<p>The draft general conformity determination was prepared and included in the draft EIS and is included in Appendix E of this Final EIS for reference purposes. The Army is continuing to work with the Commonwealth of Virginia to identify mitigation measures required to conform. The concepts being agreed to include using a developable land calculation in apportioning the SIP inventory data, specifying the enforcement inspection and penalty clauses to be used to monitor mitigation measures during construction, including mitigation measures such as limiting construction on ozone action days, meeting new engine standards for non-road equipment, equipment substitutions, diesel retrofitting, anti-idling restrictions, and the use of alternative fuels. Potential mitigation measures are included in the EIS in Section 4.4.2.3. The Army must make public its Clean Air Act conformity determination by placing a notice by prominent advertisement in a daily newspaper of general circulation in the area affected by the action, and will do so once it is completed. Information on these mitigations will be included in the ROD.</p> <p>In addition, the Army has confirmed with MWCOG that the latest planning assumptions associated with the Belvoir BRAC action will be included in the Round 7.1 cooperative forecast for the region.</p> <p>Information on mobile sources of air emissions appear in Section 4.4.2.2.2 and Appendix E.1 Sections 3.1.1.2 and 3.1.3.2. In particular, issues relating to ozone and PM2.5 were addressed. Additional text was included in the EIS to clarify the criteria used to determine need (or lack thereof) for a PM2.5 or ozone hot spot analysis or modeling.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.27	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.13 Hazardous Waste		Fairfax County - multiagency letter & attachments	
Comment			
<p>Hazardous Materials</p> <ul style="list-style-type: none"> •Development of Health and Safety Plans for each site affected by contamination in order to confirm that each site will have had the appropriate remediation before any new land uses and any construction activities that may result in exposures to hazardous materials. •Provision of copies of Health and Safety Plans to county staff for review and approval and provision to county staff of certification at the conclusion of any site remediation with a Health and Safety Plan. 			
Response			
<p>The Army has a two-fold approach to addressing safety and health issues that may arise at both cleanup sites and other on-post hazardous materials management activities. When developing cleanup plans for specific sites, the Army conducts risk assessments that take into account the current and reasonably anticipated future land uses. Final remedial decisions reflect this analysis, and would be managed safely, both during and after cleanup. An Army installation may also address general health and safety issues via an installation master plan. This master plan outlines specific pre-construction or other requirements that may be imposed on a site to ensure safety.</p> <p>In conducting cleanup, the Army is required to follow the same rules that are imposed upon the EPA. This means that the Army must follow federal cleanup laws and EPA's remediation regulations outlined in the National Contingency Plan. Under both law and regulation, the Army develops detailed cleanup plans that must be coordinated with the appropriate regulators and the public.</p> <p>All remedial decisions at Fort Belvoir are coordinated with the Virginia DEQ and EPA. For example, issues regarding RCRA, EPA is the regulatory agency. For issues regarding petroleum storage areas, DEQ is the regulatory authority. Therefore, the Army needs to coordinate with both agencies in regards to these matters. Here, the Army acts as the lead agent for cleanup. In this role, the Army conducts risk assessments and site-specific information gathering. This work is coordinated with regulators, so that all parties have a common understanding of the issues involved with a given cleanup activity. The Army then develops a range of options on how it may address cleanup. These cleanup alternatives and the proposed remedy are then presented to the regulators and public for their comment. After this process is complete, then army undertakes the remedy selected. Remedial plans, such as a Record of Decision, are available for public review at local libraries and Fort Belvoir.</p> <p>In addition to this cleanup process, the Army will work closely with the Commonwealth and the Department of Transportation to ensure that all construction activities meet all applicable health and safety requirements. Similarly, the Department of Transportation is required to take safety issues under consideration when developing highway construction plans.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.28	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use		Fairfax County - multiagency letter & attachments	
Comment			
<p>The proposal to pursue a comprehensive reclassification of land use categories for the land use plan is being considered outside the context of a more comprehensive Real Property Master Planning process, which, according to the DEIS, will not be completed until 2008. It is unclear to us how the land use plan will actually be amended--would the issuance of a Record of Decision constitute an official plan change or would there be a separate process pursued? The redesignation of land use categories may have potential implications that extend well beyond anything that needs to be considered in support of the BRAC relocations, and it is not possible to understand these implications without better definition (e.g., the "community" category would include a wide range of uses) and guidance pertaining to densities/intensities and design/form.</p>			
Response			
<p>The BRAC ROD would adopt the land use plan update. The Army is working to combine the two to the maximum extent practicable. The BRAC decision will be reflected in the upcoming Fort Belvoir Master Plan Update and associated NEPA documentation. These documents will also provide greater definition and guidance for development and preservation at Fort Belvoir.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.29	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use	4-18	Fairfax County - multiagency letter & attachments	
Comment			
<p>Page 4-18 of the DEIS expresses concern about compatibility issues associated with the existing Plan designations, but it is not clear to us that the proposed BRAC uses could not be compatible with the current designations, recognizing that these categories would need to be mapped on the Engineer Proving Ground (EPG) site and that some changes in the mapping of these categories on the Main Post may also be needed. The proposed land use category redesignations raise a number of questions that would be best addressed through a comprehensive RPMP process—we are not necessarily opposed to a streamlined set of land use designations but feel that a more comprehensive master planning process is the appropriate mechanism through which such an action should be considered; we therefore recommend that RPMP changes be limited at this time to those that must be made to accommodate the BRAC relocations and that these changes occur within the context of the existing land use designations.</p> <p>Our specific concerns relating to the proposed redesignation of land use categories are as follows: [see L5.30 through L5.35]</p>			
Response			
<p>Comment noted. The Army determined that the best course of action was to proceed with the land use plan update in order for the installation to accommodate BRAC. Other than an amendment in 2002, the land use plan was last revised in 1993 and is deemed outdated for BRAC. The BRAC ROD would adopt the land use plan update. The Army is working to combine the two to the maximum extent practicable. The BRAC decision will be reflected in the upcoming Fort Belvoir Master Plan Update and associated NEPA documentation. These documents will also provide greater definition and guidance for development and preservation at Fort Belvoir.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.30	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use		Fairfax County - multiagency letter & attachments	
Comment			
<p>The proposed action would subsume the existing “Environmentally Sensitive” land use category into other land use categories, particularly the “Community” category. Page 2-7 of the DEIS states that “environmentally constrained land areas would continue to have all regulatory protections in place,” and similar statements are made elsewhere in the DEIS, yet significant areas that have been identified as having environmental constraints are not afforded regulatory protection.</p> <p>There are significant areas of environmental sensitivity outside of the designated (and protected) “Special Natural Areas” on the post (the Accotink Bay Wildlife Refuge, the Jackson Miles Abbott Wetland Refuge, and the Forest and Wildlife Corridor), and significant portions of these areas would not be protected through Resource Protection Area designation. A table within the text of the 1993 Real Property Master Plan clearly indicated that no development was intended for any area designated as “Environmentally Sensitive,” and the removal of this designation creates concern about the potential for encroachment into these areas. The following statement, taken from page 4-267 of the DEIS, highlights this concern:</p> <p>“While changes in land use designation alone would not have consequences for vegetation, areas previously designated as Environmentally Sensitive or Outdoor Recreation could potentially be used for purposes incompatible with natural resources management goals under the new land use designations.”</p> <p>Similar statements are made elsewhere in Section 4 of the DEIS.</p> <p>The EIS should better identify the relationship between environmentally sensitive areas and the extent to which these areas would truly be protected by regulation. We recommend the retention of the “Environmentally Sensitive” designation and the application of this category to environmentally sensitive areas of the EPG site. Ideally, this designation would be expanded on the Main Post to incorporate additional areas (e.g., much of the southwest post area). Absent the restoration of this designation, plain text is needed that would clearly establish an expectation for protection of all environmentally sensitive areas on the post. Significant restrictions should be placed on land disturbing activities and active uses (e.g., recreation, military training) within environmentally sensitive areas, and such areas should be managed for the long-term protection of the natural communities and ecosystems and protection/recovery of species or communities of concern (e.g., small whorled pogonia).</p>			
Response			
<p>The project siting process on Fort Belvoir evaluates both compliance with land use designations and potential other issues with sites. Areas identified as sensitive (i.e., RPAs, wetlands) still retain their regulatory protections. See the response to Comment L1.4.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.31	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use		Fairfax County - multiagency letter & attachments	
Comment			
It is not clear exactly what within the Real Property Master Plan would be revised and what would remain, as specific amendments to the text of the RPMP are not specified within the DEIS. What would appear to remain would be a land use plan map that is inconsistent with the land use categories that are discussed and defined in the text of the Real Property Master Plan. How will the redesignation of land use categories relate to a table in the text of the 1993 plan that identifies land use acreage, developable acreage, potential number of people, and building square footage for each land use category within each planning district (recognizing that revisions were made in 2002 to the Regional Community Support Center Subarea of the North Post)?			
Response			
The Army is proceeding in an orderly and prudent manner to determine the future course of Fort Belvoir. Adoption of an updated land use plan is the first step in that process. Further revision of the post's Real Property Master Plan is underway, and total buildout from an installation-wide perspective would be discussed in that document, and follow-on NEPA documentation would analyze the environmental impacts of that buildout.			

Commenter	Comment #	Comment Type	Name
L 5	L5.32	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use		Fairfax County - multiagency letter & attachments	
Comment			
We also do not understand, and therefore cannot assess the impacts of, the proposed land use redesignations as they relate to potential future development on the post. The redesignation would seem to allow for significantly more residential and nonresidential development, and a number of statements in the DEIS seem to confirm this concern. Further, the "community" designation is vague and it is unclear what the implications of this designation would be (for example, within the preferred alternative, the Woodlawn Village residential area would be redesignated for a community use. What is the specific use anticipated for this area?) What would be the potential buildout levels of population and employment under the proposed land use designations, and what would be the implications of these potential development levels compared with what could occur under the existing RPMP (e.g., what would be the implications to roads, schools, other public facilities and utilities?) What are the permitted uses allowed under the new land use designations?			
Response			
The Army is proceeding in an orderly and prudent manner to determine the future course of Fort Belvoir. Adoption of an updated land use plan is the first step in that process. Further revision of the post's Real Property Master Plan is underway, and total buildout from an installation-wide perspective would be discussed in that document, and follow-on NEPA documentation would analyze the environmental impacts of that buildout.			

Commenter	Comment #	Comment Type	Name
L 5	L5.33	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use		Fairfax County - multiagency letter & attachments	
Comment			
We have a particular concern regarding the proposal to designate the entirety of the EPG site as "Professional/Institutional." The DEIS does not identify the proposed uses for much of the EPG site, and we therefore have no information with which to assess the implications of this land use designation. What uses are anticipated in the western half of the EPG site?			
We also note that significant areas of the EPG site are environmentally sensitive, and the incorporation of these areas within the "Professional/Institutional" category would appear to provide these areas with even less protection than would be the case under the "Community" designation. Ideally, the "Environmentally Sensitive" designation would be retained and all environmentally sensitive areas on the EPG site would be identified as such on the plan map. Fairfax County has mapped what we believe is the Accotink Creek Environmental Quality Corridor (EQC) on the EPG and we have provided this information to the Army's planning team.			
Response			
Although the land use plan itself does not reflect the EQC on EPG, the project-siting process on Fort Belvoir evaluates both compliance with land use designations and potential other issues with sites. Areas identified as sensitive (i.e. RPAs, wetlands) still retain their regulatory protections. See the response to Comment L1.4. The EQC designation remains on EPG as shown in Figure 4.8-1. Future development on the western portion of EPG is outside the scope of this EIS.			

Commenter	Comment #	Comment Type	Name
L 5	L5.34	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use	4-18	Fairfax County - multiagency letter & attachments	
Comment			
<p>Additionally, the 2003 Defense Authorization included dedication of a 135-acre portion of the western EPG area to the Fairfax County Park Authority, and the proposed land use designations are inconsistent with this action. Page 4-18 of the DEIS states: "Designation of the northwest corner of EPG as Professional/Institutional would mean that the Army intends to retain this parcel in lieu of transferring it to Fairfax County." However, the DEIS does not identify this area as a site needed to accommodate BRAC relocations. Therefore, this provision of the 2003 Defense Authorization should be implemented and the 135-acre area of the EPG should be designated as a future dedication to the Fairfax County Park Authority. Dedication of this area for recreational purposes would provide needed recreational opportunities for the federal employees who would be relocated to the area as well as for the public at large.</p> <p>The county's Comprehensive Plan recommends dedication of the entire Accotink Creek Environmental Quality Corridor and other environmentally sensitive lands to the Fairfax County Park Authority. The county's Trails Plan also identifies trail facilities on the EPG property, most notably a stream valley trail along Accotink Creek. The proposed land use plan designation for the EPG site would be inconsistent with this guidance, and the DEIS is silent regarding dedication of the EQC to the Park Authority and regarding construction of a publicly-accessible stream valley trail along Accotink Creek. We are concerned that the proposed land use designation would set the stage for access restrictions to the entirety of the EPG site, including the EQC. Such restrictions would create a large gap in access in what is planned to be a continuous stream valley park within the Accotink Creek stream valley. The EIS should commit to dedication of the EQC to FCPA, the construction of a trail consistent with the Trails Plan, and, if possible in light of security considerations, trail connections between the stream valley trail and the EPG employment areas.</p>			
Response			
<p>Designation of this area in the County Comprehensive Plan does not coincide with Army goals. Future trail systems through the EQC and the western portion of EPG are outside the scope of the EIS. The legislative authority for conveyance in Public Law 107-314 (the National Defense Authorization Act for FY2003), Section 2830, states that the Army "may" convey 135 acres at EPG. As stated in a letter from the Army to Mr. Harold Strickland, Chairman, Fairfax County Park Authority, dated September 27, 2006, the Army decided not to exercise this authority. Furthermore, siting of specific DoD buildings on EPG would not allow for public trails along Accotink Creek due to security concerns and AT/FP requirements.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.35	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use		Fairfax County - multiagency letter & attachments	
Comment			
<p>Clarification is needed regarding the "Troop" area designation as it relates to the "Residential" designation and the relationship between the proposed land use map changes and the proposed barracks modernization project on the North Post. The previous land use plan categories drew a distinction between "Family Housing" and "Troop Housing" but the current categories appear to be more ambiguous even though the intent behind the separation of housing areas into these two categories seems to remain the same. The proposed land use plan map would imply that the "Troop" use is not a residential use. Are we correct in assuming that the intent is to provide for troop housing in the "Troop" area? Also, one of the proposed projects (#19) would be the modernization of the barracks in the McRee Barracks Complex, located on North Post -- this area will be designated for Professional/Institutional use -- will troops still live there? If so, why is this area not being planned for a Troop or Residential use?</p>			
Response			
<p>The Army's intent is to provide quality troop housing in the area indicated as "Troop Areas." In the interim, McRee Barracks located in the Professional/Institutional land use area will continue to be utilized and will require repair. This is discussed in greater detail in Section 2.2.1.2.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.36	Local Agency	Gerald Connolly
Section	Page Number	Organization	
Other		Fairfax County - multiagency letter & attachments	
Comment			
<p>The scope of the proposed action, in our view, does not seem to be consistent in all cases with what is needed to accommodate the required BRAC transfers. As noted above, we do not feel that the proposed land use plan category changes are needed to support the BRAC relocations and question why this particular NEPA action is the vehicle through which these category changes are being considered. [equivalent to L1.5]</p>			
Response			
<p>See the response to Comment L1.5. The Army deliberately chose, in its discretion, to update its land use plan for Fort Belvoir as an element supporting BRAC implementation. Other than an amendment in 2002, the land use plan was last revised in 1993 and is deemed outdated for BRAC. Further revision of the Real Property Master Plan is underway. This approach provides the Army with optimal, timely information for planning.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.37	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA		Fairfax County - multiagency letter & attachments	
Comment			
<p>Scope of the proposed action: In addition, two of the proposed construction and renovation projects (the modernization of barracks and the provision of a family travel camp) seem to bear little, if any, relationship to the recommendations of the BRAC Commission. We further note that the proposed modernization of barracks on the North Post would seem to be at odds with the proposal to designate this area for "Professional/ Institutional" uses and the proposal to move the area identified for "Troop" uses to the South Post. We also note that potentially significant impacts to biological resources are identified for the proposed family travel camp use on the South Post (see pages 4-270 and 4-271). Regardless of whether or not these are desirable proposals, we question why these proposals are included for consideration within this DEIS instead of separate NEPA processes. Conversely, two projects that would appear to be closely linked to the BRAC-related growth (a shoppette and a physical fitness center at EPG) are not identified as part of the BRAC action but are instead identified as separate projects in the cumulative effects section of the DEIS. As noted later in these comments, we are also concerned that other support services that would be needed to serve the BRAC-related growth do not appear to have been addressed.</p>			
Response			
<p>In determining which projects were suitable for inclusion in the EIS, the Army selected those that are necessary for BRAC implementation and that are funded, or would occur contemporaneously with BRAC (before 2011), are funded, and do not already have environmental analyses completed. The shoppette and fitness center do not yet have assured funding. The travel camp and barracks modernization meet the latter criteria.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.38	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA		Fairfax County - multiagency letter & attachments	
Comment			
<p>NEED FOR BETTER GRAPHICAL REPRESENTATIONS OF EXISTING CONDITIONS, THE PROPOSAL AND ALTERNATIVES: The Draft Environmental Impact Statement only provides general descriptions concerning the areas that will be cleared to facilitate the proposed development and associated infrastructure and does not provide graphical depictions of proposed facilities, roads, utilities, transit facilities, parking areas, stormwater management facilities and associated limits of clearing and grading. While it is our understanding from conversations with the NEPA Support Team that detailed design information is not yet available, overall potential development envelopes, or parcels, have been identified. It would be helpful to have, for each alternative, relatively large scale information regarding the locations of these parcels as they relate to locations of vegetative communities (particularly forest and woodland communities), areas of planted tree cover, RPAs, EQCs, existing impervious cover, sensitive wildlife habitats, wetlands, and other environmental parameters. It is difficult to gauge the need for or significance of the impacts to vegetative communities and other environmental resources (or impacts to the residential areas north of the EPG site) absent this information. For example, the DEIS clearly indicates that the Satellite Campuses alternative would have more than twice the acreage of RPA effects than the other alternatives, but it does not provide any information that would indicate how much of the RPA impact for this alternative would occur within areas that have already been developed. This distinction makes a difference, but the information that is provided in the DEIS does not discuss or display the nature of the RPA impacts. The DEIS should separately identify environmentally sensitive areas that have already been altered by previous development and those that may be altered during construction. [like L1.7]</p>			
Response			
<p>The Army believes the level of detail available for describing the projects and their impacts is sufficient to reach sound decisions on the Army's proposals. Further, Appendix J, which contains site-specific impact maps and data, has been added to the EIS, and text in Sections 4.6 (Geology and Soils), 4.7 (Water Resources), 4.8 (Biological Resources), 4.9 (Cultural Resources), and 4.13 (Hazardous Materials and Hazardous Substances) have been updated to reflect and reference the information in Appendix J. In response to this comment, the Army invited county staff to visit the preparer's offices to view this information.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.39	Local Agency	Gerald Connolly
Section	Page Number	Organization	
		Fairfax County - multiagency letter & attachments	

Comment

Scope of Alternatives:

We do not feel that the scope of alternatives identified is sufficient. At the time of preparation of the county’s scoping comments (July 2006), we understood that one of the alternatives being considered for analysis would have dispersed development on the Main Post (including Davison Army Airfield), the EPG site, and the GSA site. However, all four of the build alternatives that were incorporated within the DEIS would concentrate development in certain areas, and the alternative that comes closest to a “dispersal” option (the Satellite Campuses alternative) would not place any of the development at either the EPG or GSA sites. There has, therefore, been no analysis of an alternative that provides for a more dispersed pattern of development, and all of the alternatives assume that all 9,263 staff and contractors associated with the Washington Headquarters Service relocation must be located in the same place. We recognize that there are significant transportation problems that would be created through an increased emphasis on development at the Main Post, even if development was to be dispersed on the Main Post. We therefore recommend a dispersed development approach that would more evenly divide development among the three areas being considered (the EPG site, the GSA site, and the Main Post) as opposed to the Satellite Campuses alternative. A new, hybrid alternative that disperses Washington Headquarters Services (WHS) activities on both the EPG and GSA sites but that retains the hospital on the Main Post and the National Geospatial-Intelligence Agency (NGA) relocation on the EPG site is our preferred alternative and should, at a minimum, be evaluated in the EIS.

The EIS should provide guidance as to why the GSA site has not been considered for the location of the hospital, particularly in light of the proximity of this site to the consortia health care university campus. In addition, the EIS should address opportunities that INOVA Mount Vernon Hospital may provide in supporting the post and the relocation of medical care functions from the Walter Reed Medical Center.

The GSA site affords opportunities in the Springfield area to accommodate some of the BRAC growth. A detailed analysis should be conducted to determine the feasibility of using this location, to include a study of site access and a Metro station connection. The analysis should include a determination of the level of development that this site could reasonably accommodate. Again, it would be our preference to disperse development in a manner that takes advantage of the opportunities that the GSA site provides.

We also recommend that a related hybrid alternative be considered if the proposed transportation mitigation measures cannot be fully implemented. This hybrid alternative should consider dispersal of BRAC actions to the North Post, the South Post, Davison Army Airfield, EPG, and the GSA site. Additional transportation analysis would be needed for consideration of such an alternative.

Response

Belvoir New Vision Planners formulated the Army’s alternatives for BRAC implementation. The many variables--NGA, WHS, the hospital, etc.--allow a large number of possible combinations for siting of units, activities, and agencies on Main Post, EPG, or the GSA Site. The Army has a suitable, representative array of options from which a sound result may be obtained. After publishing the draft EIS, the Army conducted a full analysis of use of the GSA site. That report, submitted to Congress, is now included in the EIS as Appendix I. The EIS examines use of the GSA parcel as part of the City Center Alternative. Because the BRAC recommendations direct realignment to Fort Belvoir, and GSA is not part of Fort Belvoir, additional legislation would be needed to allow use of the GSA parcel.

Commenter	Comment #	Comment Type	Name
L 5	L5.40	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.4 Air Quality	4-139	Fairfax County - multiagency letter & attachments	

Comment

As noted on page 4-139 of the DEIS, Fairfax County is located within a nonattainment area for the federal 8-hour ozone (O3) and fine particulate (PM2.5) standards. We are concerned that increases in local traffic, traffic congestion, construction activities and new area sources that will be associated with the BRAC actions (particularly if the full extent of identified transportation mitigation measures is not pursued) could result in increased ozone and fine particulate concentration levels within the southeastern portion of the county and feel that the DEIS does not address this concern adequately.

Response

Information on mobile sources of air emissions appear in Section 4.4.2.2 and Appendix E.1 Sections 3.1.1.2 and 3.1.3.2. Issues relating to ozone and PM2.5 were addressed. Additional text was added into Section 4.4.1.5 to clarify the criteria used to determine need (or lack thereof) for a PM2.5 or ozone hot spot analysis or monitoring.

Commenter	Comment #	Comment Type	Name
L 5	L5.41	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.4 Air Quality	4-140	Fairfax County - multiagency letter & attachments	
Comment			
<p>Page 4-140 of the DEIS notes that the proposed BRAC action is a nontransportation project within a nonattainment area. The DEIS states: "Therefore, a general conformity analysis is required with respect to the 8-hour O3 and PM2.5 NAAQS [National Ambient Air Quality Standards]. Under the general conformity rule, a project conforms if such activities DO NOT</p> <ul style="list-style-type: none"> •Cause or contribute to any new violations of an NAAQS in an area •Increase the frequency or severity of any existing violation of any NAAQS in an area •Delay timely attainment of any NAAQS or any required interim emission reductions or other milestones in an area." <p>It is our contention that the EIS should address all of the above considerations [L5-40 through L5-41] with specific analyses in order to make a final conformity determination.</p> <p>At a minimum, the EIS should take into consideration and include an analysis of the increased production of O3 and fine particulate matter (PM2.5) that will likely result from the significant increase in concentrated traffic on already congested roadways and intersections in the area. The analysis should account for increased congestion and its associated impact on speeds and associated emissions for the speeds and roadway/intersection types for peak conditions during peak travel times.</p> <p>If the above analysis shows an impact (air quality concern due to congested roadways and intersections involving significant traffic), then an O3 and PM2.5 hot spot analysis (qualitative or otherwise) should be included as part of the EIS to determine what impacts, if any, each alternative would have on local O3 and PM2.5 concentrations. The analysis should:</p> <ul style="list-style-type: none"> • Be undertaken for all intersections identified in the DEIS that can be expected to have an average level of service of D or worse. • Consider the entire period of the regional transportation plan, the forthcoming O3 and future PM2.5 State Air Quality Implementation Plans (SIPs). • Provide for various levels of implementation of transportation control measures. <p>A commitment to implement the control measures or alternatives should be provided as part of the conformity determination if impacts of air quality concern are found.</p> <p>Monitoring of intersections for ozone and PM2.5 should be pursued both before and after implementation of BRAC actions to determine if the BRAC actions will result in impacts of air quality concern. If such impacts are identified, contingency measures should be taken to mitigate these impacts. Feasible contingency measures should, ideally, be identified in the Record of Decision.</p>			
Response			
<p>The draft general conformity determination was prepared and included in the draft EIS and is included in Appendix E of this Final EIS for reference purposes. The Army is continuing to work with the Commonwealth of Virginia to identify mitigation measures required to conform. The concepts being agreed to include using a developable land calculation in apportioning the SIP inventory data, specifying the enforcement inspection and penalty clauses to be used to monitor mitigation measures during construction, including mitigation measures such as limiting construction on ozone action days, meeting new engine standards for non-road equipment, equipment substitutions, diesel retrofitting, anti-idling restrictions, and the use of alternative fuels. Potential mitigation measures are included in the EIS in Section 4.4.2.3. The Army must make available its final conformity determination, and will do so once it is completed. Information on these mitigations will be included in the ROD.</p> <p>Information on mobile sources of air emissions appear in Section 4.4.2.2 and Appendix E.1 Sections 3.1.1.2 and 3.1.3.2. Issues relating to ozone and PM2.5 were addressed. Additional text was included Section 4.4.1.5 to clarify the criteria used to determine need (or lack thereof) for a PM2.5 or ozone hot spot analysis or monitoring.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.42	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.4 Air Quality	4-143	Fairfax County - multiagency letter & attachments	
Comment			
<p>Page 4-143 of the DEIS notes that meso-scale air quality analyses would be needed to address fine particulate and ozone impacts of the various alternatives and notes that such regional analyses are typically conducted by metropolitan planning organizations using regional airshed models. The DEIS states: "Meso-scale analysis is generally not conducted on a project-specific basis and is not necessary for this EIS."</p> <p>It is our contention that the above statement can only be applied assuming that the BRAC action meets the criteria as stated above regarding conformity determination using the latest available model for estimating criteria pollutants. Therefore, a conformity determination should first be conducted as outlined above. In addition, it is our position that the BRAC action represents a regionally significant project that may impact the mobile emissions budget in the draft 8-hour O3 State Air Quality Implementation Plan (SIP) and, therefore, the on-road inventory related to this action should be included in the SIP.</p>			
Response			
<p>The draft general conformity determination was prepared and included in the draft EIS and is included in Appendix E of this Final EIS for reference purposes. The Army is continuing to work with the Commonwealth of Virginia to identify mitigation measures required to conform. The concepts being agreed to include using a developable land calculation in apportioning the SIP inventory data, specifying the enforcement inspection and penalty clauses to be used to monitor mitigation measures during construction, including mitigation measures such as limiting construction on ozone action days, meeting new engine standards for non-road equipment, equipment substitutions, diesel retrofitting, anti-idling restrictions, and the use of alternative fuels. Potential mitigation measures are included in the EIS in Section 4.4.2.3. The Army must make available its final conformity determination, and will do so once it is completed. Information on these mitigations will be included in the ROD. In addition, the Army has confirmed with MWCOG that the latest planning assumptions associated with the Belvoir BRAC action will be included in the Round 7.1 cooperative forecast for the region. Information on the regional planning process and its relationship to the preferred alternative appear in Appendix E.1 Section 3.3.2.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.43	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.4 Air Quality		Fairfax County - multiagency letter & attachments	
Comment			
<p>Page 4-154 of the DEIS indicates that regional vehicle miles traveled (VMT) will be reduced due to a net reduction of 1,700 employees from the region as a result of the BRAC actions (the net increase in employment at Fort Belvoir will result entirely from transfers within the Washington, DC region, and approximately 1,700 existing jobs at Fort Belvoir will be transferred out of the region). Because of the overall VMT reduction, the document concludes that there will be an air quality benefit (in terms of motor vehicle emissions). As noted in our "Transportation" comments, we take issue with this conclusion. We also note that factors affecting emissions of ozone precursors from motor vehicles are not limited to VMT. Might a highly congested, lower VMT condition produce higher pollutant emissions than a less congested scenario with higher VMT? This again points to the need for an estimation of localized O3 and PM2.5 concentrations and a comparison of the concentrations to the applicable air quality standard.</p>			
Response			
<p>Information on mobile sources of air emissions appear in Section 4.4.2.2.2 and Appendix E.1 Sections 3.1.1.2 and 3.1.3.2. Issues relating to ozone and PM2.5 were addressed. Additional text was included in Section 4.4.1.5 to clarify the criteria used to determine need (or lack thereof) for a PM2.5 or ozone hot-spot analysis or monitoring. Additional text and analysis were included in the FEIS to substantiate the overall reduction in VMT. Table 4.3-17 in Section 4.3.4.2.1 of the EIS was added to demonstrate a reduction in vehicle miles traveled.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.44	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.4 Air Quality		Fairfax County - multiagency letter & attachments	
Comment			
Mobile source emissions of ozone precursors should ideally be compared among alternatives (considering various levels of implementation of transportation mitigation measures) through testing of each alternative using a regional mobile source emissions model along with transportation modeling information associated with each alternative. It is our view that the DEIS assumption regarding VMT reduction based on approximately 1,700 existing jobs at Fort Belvoir being transferred out of the region is unsubstantiated and can only be confirmed through an analysis of the mobile emissions estimates comparing the alternatives in the DEIS to a no-build scenario.			
Response			
Table 4.3-17 in section 4.3.4.2.1 of the EIS demonstrates a reduction in vehicle miles traveled. Information on mobile sources of air emissions appear in Section 4.4.2.2.2 and Appendix E-1 Sections 3.1.1.2 and 3.1.3.2. Issues relating to ozone and PM2.5 were addressed. Additional text was included Section 4.4.1.5 to clarify the criteria used to determine need (or lack thereof) for a PM2.5 or ozone hot spot analysis or monitoring.			

Commenter	Comment #	Comment Type	Name
L 5	L5.45	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.4 Air Quality		Fairfax County - multiagency letter & attachments	
Comment			
The EIS should also look at hazardous air pollutants or air toxics in its analysis. There will be many diesel engines running long hours over multiple years in the construction equipment and this has the potential to create air toxics and carcinogens. Estimated emissions should be developed and it should be determined if monitoring of air toxics should be included as a mitigation measure.			
Response			
The EIS has been updated to qualitatively address HAPs associated with both construction and stationary sources in Sections 4.4.2.2.1 and 4.4.2.2.3 respectively.			

Commenter	Comment #	Comment Type	Name
L 5	L5.46	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.4 Air Quality		Fairfax County - multiagency letter & attachments	
Comment			
Page 4-153 of the DEIS notes that the estimated greatest annual project-related emission values for Nitrogen Oxides (NOx) and Volatile Organic Compounds (VOCs) exceed the respective general conformity thresholds established by EPA. Therefore, general conformity requirements apply to these precursors of ozone.			
Response			
The draft general conformity determination was prepared and included in the draft EIS and is included in Appendix E of this Final EIS for reference purposes. The Army is continuing to work with the Commonwealth of Virginia to identify mitigation measures required to conform. The concepts being agreed to include using a developable land calculation in apportioning the SIP inventory data, specifying the enforcement inspection and penalty clauses to be used to monitor mitigation measures during construction, including mitigation measures such as limiting construction on ozone action days, meeting new engine standards for non-road equipment, equipment substitutions, diesel retrofitting, anti-idling restrictions, and the use of alternative fuels. Potential mitigation measures are included in the EIS in Section 4.4.2.3. The Army must make available its final conformity determination, and will do so once it is completed. Information on these mitigations will be included in the ROD.			

Commenter	Comment #	Comment Type	Name
L 5	L5.47	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.10 Socioeconomics		Fairfax County - multiagency letter & attachments	
Comment			
<p>PARKS AND RECREATION</p> <p>The Socioeconomics section of the DEIS does not adequately examine the impacts to existing public park and recreation levels of service. This section seems to assume that all recreation needs are provided on base which is not the case. Military families are also users of parks and recreation facilities provided by public agencies. Local-serving public parks in Mount Vernon and Lee Districts are already deficient in their ability to provide athletic facilities, playgrounds and courts. Additional parkland in these districts that will support facility development is not readily available. RECenters that provide fitness and aquatics in these districts are also currently over capacity. In each alternative, recreation areas such as athletic fields and golf courses are removed from Fort Belvoir, thereby increasing the demand for public recreation services in the area.</p> <p>The Socioeconomics section suggests that growth in the area resulting from BRAC will impact public services in the short term, but that increases in the tax base will address the impacts over time. Public capital facility improvements are generally funded by general obligation bonds rather than taxes. Capital investment needs are significant across the county and compete for limited bond funding. The socioeconomic growth impacts therefore may not be as short term as predicted in the DEIS.</p> <p>The EIS indicates that the Preferred Alternative would impact on-base recreational facilities through closure of the South Post 9-hole golf course, a walking trail surrounding the golf course, and a playing field across from Pence Gate. No plan is provided for the replacement of these recreational facilities, although the addition of a new family camping area is included in the BRAC plan. The loss of the golf course, walking trail and playing field will add to the demand on Fairfax County's parks and recreational facilities, and the family camping area would not serve to mitigate this impact (and as noted earlier, we don't see the linkage of the family camp to BRAC actions). The Army should develop recreational facilities on the western EPG area to help offset additional demand created by the new development associated with the BRAC action.</p> <p>As noted earlier, the disposition of the Accotink Creek EQC and areas west of the EQC are of great concern to us. As noted in our scoping comments, the EPG site represents an opportunity to address much of the existing and projected parkland and recreational facility deficits in the Springfield area, and the Accotink Creek stream valley provides a major greenway corridor through the Springfield area of the county. Increasing residential and commercial development in the region caused by the BRAC action will further stress existing parkland and facilities. Use of this area for public purposes will require extensive environmental cleanup prior to any land transfer to ensure safe public use. However, the county continues to view the long-term dedication of this area for public park use as a critical issue. Section 4 of comment B above addressed our concern regarding the incompatibility of the proposed actions with the county's Comprehensive Plan as well as previous commitments to the dedication of parkland at EPG. We reiterate these concerns.</p> <p>We continue to recommend that the EIS indicate how the development of the EPG site will occur in a manner that is consistent with the county's Comprehensive Plan. The area west of the EQC is designated in the Comprehensive Plan for public park use and other needed public uses—the plan for this area includes 225 acres of Stream Valley/Greenway parkland, 60 acres to be developed as a complex of lighted active recreational fields for use as a sports complex, and 25 acres to be developed as a multi-use activity center for cultural and seasonal events. The Preferred Alternative and all three of the other Alternatives designate the entirety of this area for Professional/Institutional use. At a minimum, this area should be designated as Community use in recognition of the Environmental Quality Corridor, the Comprehensive Plan designation and the 135 acres promised to the Park Authority; ideally, the EQC and other environmentally-constrained land on the EPG site would be designated as "Environmentally Sensitive" areas. The prior commitment to the dedication of the 135-acre area ought to be fulfilled. Dedication of this area for recreational purposes would provide needed recreational opportunities for the federal employees who would be relocated to the area as well as for the public at large.</p>			
Response			
<p>Section 4.10.2.2, subsection "Shops, Services, and Recreation," was revised to reflect long-term minor adverse effects on off post parks and recreation. The legislative authority for conveyance in Public Law 107-314 (the National Defense Authorization Act for FY2003), Section 2830, states that the Army "may" convey 135 acres at EPG. As stated in a letter from the Army to Mr. Harold Strickland, Chairman, Fairfax County Park Authority, dated September 27, 2006, the Army decided not to exercise this authority.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.48	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.10 Socioeconomics		Fairfax County - multiagency letter & attachments	
Comment			
<p>SCHOOL NEEDS</p> <p>The DEIS identifies a projected increase of 4,340 children in Fairfax County as a result of BRAC, with an increase in school age children of 3,258. The DEIS references a Federal Impact Aid Program that could provide funding to the local school system and notes that the National Defense Authorization Act for FY 2006 included \$7 million to be dispensed to school districts that are most heavily impacted by an increase or reduction in military students due to BRAC and other Army initiatives. It is not clear to what extent the Fairfax County Public Schools would be eligible for such funds or that such funding would begin to mitigate the impact of enrollment growth. We are concerned the funding that would be provided to assist Fairfax County Public Schools in accommodating the additional enrollment would be less than that which is expected from private developments that also result in substantial enrollment increases. Specifically, to address the total impact of 3,258 school aged children (if all of these children attend public schools) will require the equivalent of 1.95 elementary schools (900 capacity), 0.4 new middle school (1,250 capacity) and 0.4 new high school (2,500 capacity) for a projected facilities cost of \$131.5 million. Adjusting this need against the existing capacity available in the area eliminates the high school need and reduces the middle school need to 0.32 new middle school buildings. The adjusted facility cost for additional middle and elementary school capacity is \$77.1 million.</p> <p>The only action that the DEIS recommends to address the projected school enrollment increases would be for the Army to “confer with potentially affected school districts on estimated student enrollment increases that could occur if the Preferred Alternative is implemented.” Our scoping comments recommended that, if a significant increase in the number of school age children was to be anticipated, sites should be identified for new schools that would be sufficient to accommodate the expected increase. This comment pertained to development of new residential units on the post itself. BRAC implementation will significantly impact schools off of the post. The Army should commit to a financial contribution sufficient to address the adjusted facilities costs required by the increase in students as a result of BRAC activity.</p> <p>We have expressed concerns in an earlier comment regarding the proposed changes to Fort Belvoir’s land use plan and uncertainties that these changes would create in terms of long-term population and employment potential. We reiterate the concern regarding potential expansions to on-post housing, as the plan changes would seem to provide the potential for significant on-post housing increases. These increases would have implications to the county’s public school system that have not been addressed in the DEIS. Again, we recommend that land use plan changes be the minimum necessary to address the BRAC relocations and that broader planning initiatives be pursued through separate actions.</p> <p>We noted earlier our concern that the DEIS does not address the extent to which there may be secondary growth associated with the BRAC relocations resulting from potential future contractors who may choose to congregate near these agencies. We noted the potential transportation implications of these decisions. This secondary growth may also result in further increases in the number of school age children. The EIS should address the impacts that secondary growth will have to the public school system.</p>			
Response			
<p>The revised/updated EIS Section 4.10.2.2.2 reflects the estimated student population in the NCR. In regards to on-post housing, at this time the Army is not planning on building more on-post housing at Fort Belvoir. The land use plan however would allow for future additional housing in the future. In regards to contractor personnel, some of the contractor personnel are already included in the analysis (see Table 2-2). These personnel were included in the population analysis in Section 4.10.2.1.2. The "Contractor Tail" is addressed in Section 5.10, Cumulative Effects, because they are not considered part of the Army's proposed BRAC action on Fort Belvoir.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.49	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.8 Biological Resources		Fairfax County - multiagency letter & attachments	
Comment			
<p>It is difficult to fully understand the implications of the various build alternatives to biological resources without graphical representations of: (1) vegetative communities on the Main Post and EPG sites; and (2) development envelopes as they relate to the vegetative communities. We reiterate our earlier comment (see part D of this attachment) regarding the need for natural resource information.</p> <p>The DEIS identifies 164 acres of impacts to vegetative communities for the preferred alternative, 155 acres for the Town Center alternative, 116 acres for the City Center alternative, and 165 acres for the Satellite Campuses alternative, with the latter figure including 56 acres of impacts to urban areas at Davison Army Airfield. It is not clear why “urban area” impacts are included in the assessment of vegetative community types for this alternative. Further, these acreage figures make little sense when compared with the “acreage converted to impervious surfaces” that would be associated with these four alternatives (183, 142, 131, and 207 acres, respectively). In most cases, the additional impervious cover figures are greater than the vegetative community impact figures—are we correct in assuming that some vegetated areas (e.g., maintained turf, “urban” areas) are not included in the vegetative community type data? Clarification (and preferably detailed graphics) should be provided.</p> <p>The loss of tree canopy on these properties has potential to significantly impact overall tree canopy levels in Fairfax County and to disrupt the delivery of ecological, environmental and socio-economic benefits that the trees on these properties are delivering to the community at large. Therefore, serious efforts should be made to preserve forested areas during the initial design and construction phases of this project. The DEIS does not specify the tree replacement efforts that will be pursued to mitigate these impacts. There are general references on page 4-271 to replacement of “habitat lost to development with native community habitat” and to Fort Belvoir Natural Resources management policies and goals, as specified in the post’s Integrated Natural Resources Management Plan. However, it is not clear if the tree replacement policy referenced in the INRMP is current, and there is concern regarding whether Fort Belvoir will apply tree replacement efforts to the EPG site, where much of the tree cover is immature. The EIS should provide clarification regarding Fort Belvoir’s tree replacement policy and how it will be applied for the BRAC projects. It is our view that the early/mid successional vegetation within portions of the EPG site provides ecological services (as evidenced by the identification of much of the eastern half of the EPG site as Partners in Flight Priority Bird Habitat on Figure 4.8-1 and the discussion on page 4-263 of bird habitats) and that it would be appropriate to mitigate for the loss of these services. The tree canopy that would be removed to accommodate new development (even where in an early/mid successional stage) should be restored via reforestation and landscape tree planting, and a commitment should be made to the preparation and implementation of a tree restoration plan (ideally a graphical representation of where restoration efforts will be pursued). If space for tree planting is lacking on Fort Belvoir, we would encourage Fort Belvoir staff to coordinate with the county’s Urban Forest Management Division and Stormwater Planning Division for ideas as to where planting could occur near the post.</p> <p>In addition to losses of forested acres and tree cover, the Fort Belvoir BRAC DEIS indicates that other vegetative cover and habitat types will be impacted. The EIS should be revised to provide acreage figures of other non-forested impacts. Special attention should be given to avoiding impacts to high quality vegetative stands in community types such as meadow and old field, shrub lands, etc. in addition to already identified sensitive resources. Efforts should be made to avoid impacts to these areas especially when adjacent to other high quality habitats. Where impacts cannot be avoided, mitigation could be attained by providing similar acreages of impacted vegetated types elsewhere on Fort Belvoir that would then be managed for that cover type (e.g., mitigated meadows and old fields should be maintained in an early succession stage to prevent eventual loss to forest cover in order to maintain the important biological services provided by meadows and old fields).</p>			
Response			
<p>Approximate acreages, the best approximations that can be made, of effects on sensitive biological resources, and maps of the locations of projects under the proposed alternatives have been added to the EIS as Appendix J to help the reader understand the effects on biological resources. The text has been updated to reflect the most recent information concerning the proposed alternatives.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.50	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.8 Biological Resources	4-270	Fairfax County - multiagency letter & attachments	
Comment			
<p>Page 4-270 identifies impacts to habitats that would occur for the preferred alternative, including the loss of eight acres of sensitive flora habitat and six acres of sensitive fauna habitat. This likely includes areas on the EPG rated as medium- and high-quality habitat for small whorled pogonia and could potentially include habitat suitable for the wood turtle (which would be expected to be concentrated in larger, low-lying areas but will use upland habitat to lay eggs). These species are indicators of environmental health. Preservation of their suitable habitat means preservation of relatively high quality ecosystems that harbor many species. Therefore, any infringement of the habitat for sensitive species or on sensitive communities should be minimized so as to preserve the maximum amounts of these land areas as possible. While we recognize that impacts to the small whorled pogonia habitat on the EPG site will be indirect (e.g., edge effects and habitat fragmentation) and that they would be related to the proposed and essential extension of the Fairfax County Parkway, natural resource plans for the EPG site and future planning efforts on the site should protect these areas to the extent possible.</p>			
Response			
<p>Fort Belvoir will follow the guidelines in its INRMP, its natural resources management policies, and federal and federally designated state regulations in protecting all sensitive flora and fauna. Effects on these resources will be minimized to the extent practicable and the protective guidelines are incorporated into the EIS as BMPs in Section 4.8.2.5.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.51	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.8 Biological Resources		Fairfax County - multiagency letter & attachments	
Comment			
<p>The southwest post area is the most important remaining undeveloped large land area at Fort Belvoir. It contains the largest number of sensitive resources, lies between the flowing streams and estuaries of Accotink and Pohick Creeks, contains a high percentage of steep slopes and erodible soils, and would be highly impacted by development activity. Ideally, the entirety of this area would be preserved for natural and cultural resource protection and management with no development and limited activities. We commend Fort Belvoir for focusing the proposed development away from this area for all alternatives and would stress the need for sensitivity to the resources in this area as future consideration of the Operations Security Evaluation Group Training Facility (#29 of the on-post cumulative construction/renovation projects identified in Section 5 of the DEIS) occurs.</p>			
Response			
<p>Thank you for the comment. No change to the document.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.52	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.8 Biological Resources		Fairfax County - multiagency letter & attachments	
Comment			
<p>Wetland impacts should be mitigated as close to the source(s) of impacts as possible, and preferably within the same watershed as the impact(s). The Stormwater Planning Division of the Department of Public Works and Environmental Services may have suggestions regarding wetland mitigation sites.</p>			
Response			
<p>The Army has applied for a Joint Permit Application for EPG, and recognizes impacts to 2.3 acres of wetlands as stated in Section 4.8.2.4.2 of the FEIS. The permit, which is available for public review, and Section 4.8.2.5 state that the Army will contribute appropriate funds to the Virginia Aquatic Resources Trust Fund (VARTF) to achieve no net loss of wetlands functions and values.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.53	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.8 Biological Resources		Fairfax County - multiagency letter & attachments	
Comment			
<p>The DEIS indicates that transportation projections will require construction through Resource Protection Areas and Environmental Quality Corridors. Road design and construction practices should be pursued in a manner that minimizes resource impacts. Examples include: locating stream crossings to minimize floodplain/EQC impacts; utilization of bridges or, when bridges are not possible, open-bottom culverts in order to maintain natural stream flow; incorporation of low impact development stormwater management practices to provide water quantity and quality controls; incorporation of wildlife passage tunnels and larger culverts to facilitate safe wildlife movement across road corridors; use of native plants in stabilizing roadside areas and to avoid frequent mowing of shoulders and medians; ensuring that invasive plant species are not used in stabilization efforts; and control of invasive plant species during stabilization and restoration project establishment phases. Road and utility crossings of EQCs should be designed in a manner that will minimize disturbance associated with these crossings.</p>			
Response			
<p>Fort Belvoir will follow standard low-impact construction practices and industry-accepted BMPs for all construction activities in sensitive areas. Army regulation, permit conditions, and state BMP manuals will be used as guidance for construction design and implementation.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.54	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.8 Biological Resources	4-271	Fairfax County - multiagency letter & attachments	
Comment			
<p>Page 4-271 indicates that projects in the North Post area “could indirectly encroach upon the Forest and Wildlife Corridor and create additional edge effects and invasive species incursions.” For alternatives that would locate projects near this corridor, projects should be set back from the corridor such that these impacts will be avoided.</p>			
Response			
<p>Fort Belvoir will avoid encroaching upon the Forest and Wildlife Corridor to the extent practicable. Protection of the Forest and Wildlife Corridor is a Fort Belvoir policy in the INRMP and is incorporated in the EIS as a BMP. No facilities are being sited in the the Forest and Wildlife Corridor. Unavoidable road and utility crossings through the corridor will be kept to a minimum and areas temporarily disturbed during their construction will be reforested.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.55	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA		Fairfax County - multiagency letter & attachments	
Comment			
<p>It is difficult to come to conclusions regarding whether any one alternative should be preferred over the others for a number of reasons. We have previously discussed the need for better graphical information regarding environmental conditions and impacts and view this as an impediment to gaining a full understanding of the implications of any alternative. Also of concern is a need to define the terms that are used to summarize most of the impacts, such as “minor adverse,” “minor beneficial,” and “moderate.” Interestingly, these terms are not used in the discussion of transportation impacts; instead, adverse transportation impacts associated with the proposed BRAC relocations are considered to be “significant.” We would consider these impacts to be “major” absent commitments to fully implement mitigation measures.</p> <p>There is also a need for a concise yet comprehensive summary of impacts for each alternative that is presented in a manner that facilitates comparisons among alternatives. The Final EIS should present a comparative matrix that summarizes comprehensively the impacts associated with each alternative. Summary tables are presented for some of the individual sections (e.g., the water resources summary table on page 4-256); a more comprehensive presentation is needed of each of the types of impacts evaluated.</p>			
Response			
<p>Appendix J has been added to the EIS, which provides graphical representations. In addition, the EIS preparers met with Fairfax County staff on April 27, 2007, and provided available information pertinent to the comment. Whether an effect is significant is determined by reference to its context and intensity. Given the wide latitude in which such context and intensity might have to be considered, the better practice is not to attempt to define “one-size-fits-all” for significant or minor effects. The gradation of adverse impacts is different for each resource area and this is explained in each section of Chapter 4. The Army has determined that the summary presented in the Executive Summary and at the end of each resource area section are sufficient to allow impact comparison.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.56	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.10 Socioeconomics		Fairfax County - multiagency letter & attachments	
Comment			
<p>A net increase in 22,000 employees at Fort Belvoir will generate considerable needs for support services, including retail opportunities, restaurants, child care facilities, recreational facilities and emergency services. The DEIS does not address the extent to which the demands for support services will be satisfied through on-site facilities, the extent to which the employment figures presented in the DEIS (and associated impact evaluations) include employment that would be associated with support services and the extent to which such facilities could be expected to be pursued as additional development subsequent to the BRAC relocations. There is a need for a better understanding of the land development implications of the need for on-site support facilities that the various alternatives would generate. The EIS should provide these clarifications. While we recognize that the net increase of 22,000 employees at Fort Belvoir will likely have substantial economic benefits to the Springfield Community Business Center, the Franconia-Springfield Transit Station Area, and the Richmond Highway corridor, and while we recommend that transit service be established to provide connections between the development sites and these commercial areas throughout the working day, we feel that it is imperative that support facilities be provided on-site in order to minimize vehicle trips to and from the development areas and that the levels of on-site support services that will be needed/provided be identified (both in terms of employment and physical location) and evaluated in the EIS.</p>			
Response			
<p>Information on matters raised in the comment appears in Section 4.10.2.2, subsection "Shops, Services, and Recreation," and Section 5.10, Cumulative Effects. Emergency facilities and staffing of these facilities is also addressed under Section 4.10.2.2.2. Transportation and transit is addressed in Section 4.3. The increase of 22,000 employees was accounted for when planning for BRAC and other non-BRAC on-post support facilities. Other non-BRAC projects will be identified in Fort Belvoir's upcoming Master Plan Update and associated NEPA documentation.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.57	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.10 Socioeconomics		Fairfax County - multiagency letter & attachments	
Comment			
<p>With respect to emergency services, the preferred alternative and City Center alternative would include the construction of an Emergency Services Center on the EPG site. Page 4-342 of the DEIS states: "Fort Belvoir plans to construct additional emergency and medical facilities, purchase the appropriate equipment, and bring on the additional personnel to provide sufficient police, fire, and medical emergency response to the new structures and to support the installation's increased population under the BRAC action." No information is provided, however, regarding when the new facility at EPG would be operational, the anticipated staffing of the facility and how short-term and long-term staffing levels will relate to anticipated demands associated with the new development at EPG. This information should be provided. We also recommend that this facility be incorporated into the Northern Virginia Mutual Response Agreement and that the emergency service/911 system at EPG be interoperable with Fairfax County's 911 dispatch center.</p> <p>A new Emergency Services Center would not be provided on the Main Post for any of the alternatives. Would emergency services on the Main Post be sufficient to satisfy demands associated with employment growth?</p>			
Response			
<p>Congress mandated that BRAC actions would be completed by September 2011. The text in Section 4.10.2.2.2, subsection "Police, Fire, Medical," was revised to state that the emergency services center on EPG would be constructed under the Preferred Alternative by 2011 and that staffing would be done in accordance with Army Regulation AR420-90. There is no "interoperable" 911 system in Northern Virginia. Fairfax County, Fairfax City, Fort Belvoir, Arlington County, Alexandria City, Prince William County, and Loudoun County all have their own, separate 911 systems. These fire and emergency services departments are all part of the Northern Virginia Emergency Services Mutual Response Agreement and coordinate as needed and in accordance with this agreement. The BRAC action would not change this agreement, and Fort Belvoir would continue to communicate, coordinate, and support the surrounding community fire and emergency response departments as they do now and in accordance with the mutual response agreement. Proposed emergency services improvements on the Main Post are addressed in Section 5.10, Cumulative Effects.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.58	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.10 Socioeconomics		Fairfax County - multiagency letter & attachments	
Comment			
For each of the build alternatives, two child development centers would be provided—one for the NGA employees and one for other employees. These centers would provide services for 244 and 302 children, respectively. Will these facilities be sufficient in capacity to meet the demands of the new employees? If not, will additional facilities be provided?			
Response			
The child development centers would be designed to accommodate the incoming BRAC work population.			

Commenter	Comment #	Comment Type	Name
L 5	L5.59	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.10 Socioeconomics		Fairfax County - multiagency letter & attachments	
Comment			
The DEIS does not address other support service needs aside from the recognition of a physical fitness center and shoppette as “cumulative” construction projects that would be provided at the EPG site. If these facilities are intended to serve the new growth at EPG, why are they being considered separately rather than as part of the BRAC action? Would the shoppette be sufficient to meet the retail demands of the employees at EPG? Would it include a gas station? What dining services are proposed for the EPG site? We are concerned that the magnitude of the additional employment at the EPG site may generate considerably more demand for retail and dining services than what is being proposed and that this demand may result in a proposal to develop retail support uses in the western EPG area. The EIS should identify and site on-site support service needs and assess the impacts of facilities that would need to be provided to accommodate this demand.			
Response			
Information on matters raised in the comment were not considered part of the BRAC action because they did not meet at least one of the following 3 criteria: not funded by BRAC funds; would not be constructed by the congressionally mandated 2011 BRAC implementation deadline; or were not ripe enough for NEPA analysis. Support services were addressed in the EIS in Section 4.10.2.2.2 and in Section 5.10 Cumulative Effects. Some facilities (i.e., dining, fitness rooms, etc.) for some tenant and organizations (NGA, WHS, and the hospital) coming to Fort Belvoir are integrated into the buildings for some BRAC projects. Other non-BRAC support facilities will be identified in the installation's upcoming Master Plan Update and associated NEPA documentation.			

Commenter	Comment #	Comment Type	Name
L 5	L5.60	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County - multiagency letter & attachments	

Comment

TRANSPORTATION--GENERAL

Page 4-29 of the DEIS notes that the Congressional Directive regarding the BRAC actions “requires that the transportation system be studied to determine the impacts that would be expected due to the BRAC action, to identify projects that would mitigate and off-set those impacts, and to quantify the needs for new transportation infrastructure.” It is notable that transportation mitigation commitments are not made in the DEIS. As noted earlier, we feel that transportation mitigation actions for the preferred alternative, as identified in this DEIS, should be committed to as part of the Record of Decision. The BRAC action is expected to have significant adverse impacts on the transportation system immediate to the installation and extending several miles in each direction. Impacts to the I-95 corridor are expected to be particularly severe. Construction of a six-lane Fairfax County Parkway section along the EPG is identified as fundamental to the development and operation of the preferred BRAC land use alternative. Relief of congestion on I-95, north and south of the Fort Belvoir sites, is also identified as a critical need. Transportation improvements to address these anticipated impacts should be a component of the BRAC Record of Decision. We have a number of recommendations for commitments to transportation improvements that should be recognized in the Record of Decision—please see section A of this attachment.

A discussion of transportation improvements identified within transportation planning documents begins on page 4-56. We feel that the Defense Access Roads program should pay for the full six lane improvement of the Fairfax County Parkway by 2011; four lanes are insufficient to accommodate BRAC volumes on this facility. Table 4.3-8 should also show the six lane improvement of the Fairfax County Parkway (VA 7100) from Rolling Road/VA 7900 to Fullerton Road.

The BRAC date is set at 2011. Transportation improvements that are proposed in this EIS must be in place prior to that date if the assumptions of the alternatives are to work. A transportation strategy that would address the timeline, funding, and a project execution plan should be included in this document. If not, the transportation improvements remain open ended and BRAC moves could occur without the required transportation infrastructure. We again recommend the development of a comprehensive strategy to implement and fund the required transportation improvements that would address the adverse impacts to the transportation system as a result of BRAC.

Section 4.3 of the DEIS indicates that all build alternatives would have significant adverse impacts on transportation. The transportation mitigation projects identified for the preferred alternative are based on the broad analyses performed for the DEIS; detailed traffic operational studies have not yet been performed. Considerable further planning and analysis will be needed to adequately identify and address roadway deficiencies in the local network off post and along access routes/points to Fort Belvoir and EPG. Any needed improvements that are identified through the more detailed operational analysis should be included in the transportation mitigation plan.

The county’s Comprehensive Plan for the EPG site includes major transportation improvements to support development at this location. To what level does the DEIS take into consideration the transportation mitigation measures shown with those in the county’s Comprehensive Plan?

Response

The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. Funding of transportation projects will also be addressed in the ROD. The DEIS does consider the transportation elements as shown in the County’s Comprehensive Plan, and has adopted a number of those improvements and does not preclude the implementation of other improvements.

Commenter	Comment #	Comment Type	Name
L 5	L5.61	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County - multiagency letter & attachments	

Comment

TRANSPORTATION--GENERAL

The county and state have very limited funding to complete any of the recommended transportation mitigation projects, and it is our view that transportation mitigation projects ought to be funded by the federal government. Does the Army share this expectation? If not, to what extent does the Army expect the State and county to fund and construct the transportation projects? Any such expectations should be identified within the EIS.

Response

The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD.

Commenter	Comment #	Comment Type	Name
L 5	L5.62	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County - multiagency letter & attachments	
Comment			
<p>TRANSPORTATION--GENERAL</p> <p>The DEIS identifies costs for transportation projects. Are these costs presented in 2007 dollars? If so, they should include a cost escalation factor—the actual costs will presumably be higher in the future depending on the time frames for construction. The EIS should address this issue. Did the cost estimates include any contingency money? How would the Army fund the construction of the proposed transportation improvements that would not be eligible for funding under the Defense Access Roads program? Does the Army have a long term investment strategy for funding the transportation improvements?</p> <p>Will the Army implement a BRAC-related phasing plan that will link the availability of necessary roadway and transit improvements with BRAC-related development?</p>			
Response			
<p>Project costs discussed in the EIS are in 2007 dollars. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. Funding of transportation projects will also be addressed in the ROD.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.63	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County - multiagency letter & attachments	
Comment			
<p>TRANSPORTATION--GENERAL</p> <p>The proximity of EPG and Fort Belvoir to the Franconia-Springfield Metro and VRE stations could afford opportunities to optimize transit use. The DEIS does not commit or address in sufficient detail how the Army would try to optimize the use of transit; we feel that transit is treated superficially in the report. Only very general thought has been given to how bus service could achieve a 5 or 10 percent mode split (the two scenarios described on pages 4-87 through 4-89). There is no indication of the methodology used in determining the 5 and 10 percent mode share. This leaves the reasonableness of these assumptions in question. In addition, for the 10 percent modal share option, a vehicle reduction of 750 is assumed. However, for this option only 12 additional buses are specified. Assuming every bus is 100% full all the time (an unreasonable assumption!) the twelve additional buses will only be able to serve 500 passengers in the peak hour. This will reduce peak vehicle trips to the base by about 400 vehicles (assuming average vehicle occupancy of 1.2) and not the 725 stated on page 4-84.</p> <p>The DEIS does not indicate how the initial startup costs and the ongoing operational costs of increased bus service would be funded.</p>			
Response			
<p>The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD. A transit mode share of 5 to 10 percent was assumed for analysis purposes. The proposed service concepts, including areas to be served and general levels of service, have been identified as being what would be required to provide the needed transit capacity to serve those trips. These levels of service, along with the complementary shuttle services, on-post circulation, passenger amenities, and general TDM measures, are designed to achieve those levels of ridership. The 10 percent mode share option calls for 28 additional buses, not 12, and makes no assumptions about buses being full all of the time. The 725 vehicle trip reduction is for the peak hour. It is based on 21,000 trips, a 10 percent transit mode share, a 1.1 average vehicle occupancy rate, and 38 percent of the trips occurring in the peak hour.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.64	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County - multiagency letter & attachments	

Comment

TRANSPORTATION--GENERAL

The Franconia-Springfield Metro station provides access to one of the finest urban rail systems in the U.S. No mention is made of any bus priority measures to increase the attractiveness of the proposed shuttle bus service between the EPG and the Franconia-Springfield Metro station. This type of development should strive to maximize transit trips. The EIS should address in more detail a transit plan and how this plan would be implemented. How would the various transit opportunities in and around EPG and the Main Post (e.g., Metrorail, Metrobus, VRE, Fairfax Connector) be integrated? A detailed plan that integrates the local transit availability should be included in the EIS. This should include a review of local transit service schedules and determinations of any locations for which additional service should be implemented. If additional service is needed to serve the BRAC development, funding for this service should be identified. As an example of a consideration for BRAC, it would not be likely that Fairfax Connector Route 171 could be rerouted due to capacity, demand and scheduling issues. There may be a need to establish a separate route to link EPG with the Lorton VRE station and parking facilities; such a route could reduce travel time for those passengers when compared with a modified routing of existing bus service, and it would not affect existing passengers. A direct shuttle from the Lorton VRE station should be considered; it would be appropriate for direct shuttles for the Franconia-Springfield Metro station and for the Lorton VRE station to be operated by the Department of Defense.

Insufficient detail on mass transit is provided in this DEIS to develop these mitigation measures to the necessary level. Actions to begin procurement of vehicles, identify funding commitments, etc., should be identified and initiated early so that 2011 opening date can be met.

As recommended earlier, the Army should commit to running a shuttle from the Franconia-Springfield Metrorail station and/or the Lorton VRE station to EPG and/or the Main Post. The Army should also commit to providing shuttle service to retail/commercial areas that are proximate to the EPG site and the Main Post. The Fairfax Connector 171 route would provide bus service to the Richmond Highway corridor from Main Post. Increased service levels on the Route 171 would be driven by demand, and constrained by the availability of resources to fund and operate the additional service.

Response

At this stage of the process, a conceptual plan for transit service has been developed that indicates the areas and levels of service required to achieve a 5 to 10 percent mode split. More detailed operational plans will be developed if the ROD adopts transit services as one of the mitigating actions. Other elements of the project, including site access, site circulation, and site security measures will have an impact on the final designs of the transit service. Only preliminary costing can be completed at this time, and will be revised as the service plans are updated and refined. The proposed concept of a limited stop bus service in the Route 50 corridor is based on the characteristics of the service area, the trip lengths involved, and the nature of the major arterials in the area. It was not based on any specific bus route identified in the WMATA study. The currently proposed service concepts are not meant to infer specific changes to existing services. In the case of Route 1, the concept is to add the equivalent of two additional peak buses worth of service. During the detailed planning phase, determinations will be made if this can best be achieved through adding buses to one or more of the existing routes in the corridor, by initiating a new route, or by implementing a major service restructuring in the corridor. It is also the case for Route 50 that the proposed concept does not specifically refer to any currently planned or proposed routes. Rather, this concept recognizes the need for some type of limited stop service with reduced travel times when compared to local bus service. The mitigating section for each alternative, such as Section 4.3.4.4 for the preferred alternative, provides a description of shuttle services to connect with the Metrorail station.

Commenter	Comment #	Comment Type	Name
L 5	L5.65	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County - multiagency letter & attachments	

Comment

TRANSPORTATION--GENERAL

The development and implementation of a detailed transportation demand management (TDM) plan would serve to reduce impacts to the transportation system. We recommend that such a plan be developed. This plan should include a strategic plan that details specific actions and trip reductions. As part of this plan, bicycle commuting should be facilitated through the provision of secure bicycle parking facilities and shower and locker facilities within new office buildings. The Army should seek funding for a full time position at Fort Belvoir to manage the TDM program—we suggest changing “could” to “would” regarding the appointment of a TDM Coordinator. As noted on page 4-89 of the DEIS, appointment of a TDM Coordinator before FY 2009 would allow development of program initiatives before BRAC relocation of personnel.

Response

Adoption of the traffic demand management program and hiring appropriate staff to manage it will be addressed in the Record of Decision. Included in the description of the TDMC are allocations for bike and shower facilities.

Commenter	Comment #	Comment Type	Name
L 5	L5.66	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County - multiagency letter & attachments	
Comment			
<p>TRANSPORTATION--GENERAL</p> <p>The I-95 interchange with the Fairfax County Parkway provides a critical link to both the EPG site and the Main Post. The transportation analysis should provide sufficient detail on the operation of this interchange to handle the BRAC-related land use changes. The I-95 northbound movement to Fairfax County Parkway westbound lacks sufficient detail and analysis. This movement provides a critical link, and the EIS should address the necessary improvements (general purpose and HOV lane connections) at this interchange to accommodate the anticipated traffic volumes. In addition, a high occupancy toll (HOT) lane will need to be accommodated at this location. The EIS only addresses the HOV movement at this interchange.</p> <p>The I-95 interchange with the Franconia-Springfield Parkway is also of note. Additional ramps to/from I-95 general purpose and HOV lanes should be considered. A more detailed operational analysis should be conducted to identify improvements at this interchange.</p>			
Response			
<p>The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. Funding of transportation projects will also be addressed in the ROD. The timeline will be considered during preparation of the ROD. If the I-95 HOT lanes are implemented, the ramp would not preclude HOT traffic.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.67	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County - multiagency letter & attachments	
Comment			
<p>TRANSPORTATION--GENERAL</p> <p>The EIS should address Intelligent Transportation Systems (ITS) and their applicability to the transportation system in the Fort Belvoir area. For example, such a system could include variable message signs indicating changes in force protection, gate closures, etc., thereby redirecting traffic to alternative gates and roads and reducing traffic congestion.</p> <p>Traffic signal optimization should be considered along the Richmond Highway Corridor, the Fairfax County Parkway, the Franconia Springfield Parkway and perhaps elsewhere.</p>			
Response			
<p>The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. Funding of transportation projects will also be addressed in the ROD. The timeline will be considered during preparation of the ROD. Text on implementation of ITS technology has been added to Section 4.3.5.4, and traffic signal optimization could be considered as a future action.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.68	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County - multiagency letter & attachments	
Comment			
<p>TRANSPORTATION--GENERAL</p> <p>The DEIS provides no detailed analysis of Richmond Highway related to the BRAC actions. The relocation of the hospital to a site near the Pence Gate suggests the potential for significant impacts along the Richmond Highway corridor and the Pence Gate access; Richmond Highway impacts and improvements should be addressed in more detail.</p>			
Response			
<p>The analysis has shown the need for improvements to the intersection of Route 1 and Belvoir Road. See Sections 4.3.4.4, 4.3.5.4, 4.3.6.4, and 4.3.7.4.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.69	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County - multiagency letter & attachments	
Comment			
TRANSPORTATION--GENERAL Improvements to the Kingman Road/Fairfax County Parkway intersection are critical in that the National Museum of the U.S. Army is proposed for this area.			
Response			
The Museum is not part of the proposed BRAC action at Fort Belvoir, therefore is not part of the analysis. The EIS recognizes these impacts in as cumulative impacts (Section 5 of the EIS). The Museum will have its own NEPA process and mitigation measures. The Kingman Road site has not been selected as the site for the museum. That site and others will be analyzed in a subsequent NEPA document.			

Commenter	Comment #	Comment Type	Name
L 5	L5.70	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County - multiagency letter & attachments	
Comment			
TRANSPORTATION--GENERAL It should be noted that safety and security are important issues. The adverse effect of increased traffic congestion on response times for emergency services and potential emergency evacuation should be mentioned. Also, vehicle crash rates can be expected to increase with increased volumes and delay times at intersections/roadways near Fort Belvoir.			
Response			
Comment noted, the impact of increased traffic on emergency response times is recognized. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. The mitigating actions would reduce traffic congestion, and lessen the impact to emergency vehicles. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.			

Commenter	Comment #	Comment Type	Name
L 5	L5.71	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation	4-84	Fairfax County - multiagency letter & attachments	
Comment			
More detail should be provided on several of the mitigation projects identified beginning on page 4-84 of the DEIS, and operational analyses should be initiated in order to affirm their efficacy. In order to meet the BRAC timeline, probable schedules for EIS work and other requirements should be developed as soon as possible. For the transit system, detailed route and service planning should be initiated soon in order to meet the BRAC target date. While a 5 – 10 percent target mode split has been established for impact analysis purposes, transit planning for the BRAC development should strive to achieve higher transit usage levels, as described in Fairfax County Comprehensive Plan guidance for the EPG property			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.			

Commenter	Comment #	Comment Type	Name
L 5	L5.72	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County - multiagency letter & attachments	
Comment			
As a matter for consideration to accommodate bus service, the design of the conceptual access point at the Fairfax County Parkway / Rolling Road interchange could include a bus station that would permit buses from outside the EPG to drop and load passengers on one side, while internal shuttle buses would load and drop passengers on the other side. This facility could include a security checkpoint if necessary. The bus station should be constructed in such a way that both external and internal buses would be removed from the traffic flow. For instance, constructing loop ramps to permit buses from both sides to reverse direction would require the construction of an underpass on the connection to Rolling Road; this structure would also provide a covered waiting area for bus passengers. This bus station could be located at another location to serve the EPG site in coordination with Fairfax County			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD. One potential mitigation action is a transit center for EPG and Main Post, final siting has not been identified.			

Commenter	Comment #	Comment Type	Name
L 5	L5.73	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County - multiagency letter & attachments	
Comment			
For the potential security operating scenario for Main Post (page 4-135), a bus station that would permit buses from outside the Main Post to drop and load passengers on one side should be constructed at a grade-separated connection between the North and South Posts. This facility would permit buses from outside the Main Post to drop and load passengers on one side, while internal shuttle buses would load and drop passengers on the other side. This facility would include a security checkpoint. The bus station should be constructed in such a way that both external and internal buses would be removed from the traffic flow on Richmond Highway and the North Post / South Post, respectively. This station would require one, or possibly two, additional traffic signals on Richmond Highway, depending on the size and configuration of the facility.			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD. If the transit center/facilities are accepted as a mitigating action, further detail will be developed. There would be a transit center for each EPG and Main Post.			

Commenter	Comment #	Comment Type	Name
L 5	L5.74	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County - multiagency letter & attachments	
Comment			
<p>In response to a number of concerns regarding the travel demand modeling approach and assumptions that would be used during the modeling process a number of meetings were conducted with the Virginia Department of Transportation, Fairfax County Department of Transportation, Department of the Army, and the Army's transportation consultant. In addition this issue was discussed at length during the Board of Advisors and Transportation Working Group meetings and have been supported by a number of members of the county's Board of Supervisors. As a result the state, county, and Army agreed upon a set of basic assumptions and procedures to be used in the transportation modeling approach. The process to reach agreement was completed over an extended period of time, required a number of meetings, and was done in a very cooperative manner. The agreed upon Travel Demand Modeling Approaches are listed under section 4.3.1.3 (page 4-33) of the DEIS.</p> <p>That being said, in general, very little information is provided on some critical assumptions made and factors used in the transportation modeling and capacity analysis. Therefore it was not possible to review the reasonableness of these assumptions and factors. Examples:</p> <ul style="list-style-type: none"> • Spreading trips to alternative routes due to capacity constraint is mentioned but the extent of the spread is not quantified. This item alone can change BRAC-related volumes along critical highway sections by as much as 20%-30%. • Factors used in capacity analysis such as the peak-hour factor, the percentage of trucks, the geometry, etc., can influence capacity by as much as 20%-30%. <p>It is strongly recommended that the assumptions and factors used in the report be documented in order to evaluate their reasonableness. We have a number of specific comments and questions regarding the transportation data provided in Section 4. Please see these comments within Attachment B of this document.</p>			
Response			
<p>Additional information can be made available to the county if desired. It is typical that full detailed assumptions of modeling, traffic operations (signal timings) and other transportation analyses are not placed into the EIS documentation. For example, to document the signal timing and operational analyses of the intersections analyzed for all the alternatives, the Synchro output will exceed 1,000 pages.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.75	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation	ES-9	Fairfax County - multiagency letter & attachments	
Comment			
<p>The second paragraph on page ES-9 states: "For all the alternatives, implementing the BRAC action would decrease both the number of vehicles and the total vehicle miles traveled (VMT) within the region. This conclusion is based on the net reduction of 1,700 personnel from the region as a result of the BRAC relocations. This seems unlikely when the full impact of BRAC is considered, including private development and Enhanced Use Leasing (EUL) activities that are likely to offset the personnel reduction. Department of Defense personnel vacating space in Crystal City (and other areas in the Capital region) would relocate to Fort Belvoir. That vacated space would be occupied by some other entity therefore the net reduction might be overstated.</p>			
Response			
<p>The BRAC Action does not include private development or EULs. The analyses shows that there is a reduction in VMT because of relocating employees to Fort Belvoir and some employees changing their distribution. For modeling purposes, regional employment totals were not changes, so it is a redistribution of jobs.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.76	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County - multiagency letter & attachments	
Comment			
<p>At the bottom of page 4-30, the DEIS states: “Typically these [traffic operational] studies are completed following completion of an EIS . . .” – Studies are required to analyze the key effects of a project. For BRAC, the key impact is on transportation. Without traffic operation studies, the impacts and potential mitigation costs cannot be determined fully. Completing these studies in sufficient time to accommodate the BRAC schedule is critical.</p> <p>It is recognized that the employment figures associated with the WHS, NGA and Missile Defense Agency relocations incorporate contractors for these agencies who will be working on-site, but the DEIS does not address the extent to which there may be secondary growth associated with the BRAC relocations resulting from other potential future contractors who may choose to congregate near these agencies and the transportation implications of these decisions. The DEIS notes, on the bottom of page 4-79 and top of page 4-80, that concerns have been raised regarding the potential for probable “ripple effects” of induced employment and development in and near the study area, and that the current model cannot assess the impact of these ripple effects. Forecast traffic volumes, therefore, likely under represent actual future conditions. The EIS should address the impacts that secondary growth will have to the transportation infrastructure.</p>			
Response			
<p>The Study Team met with representatives from Fairfax County and VDOT to develop the land-use plans that should be used. Through collaboration with and agreement from both agencies, it was determined that these future contractor tails represent speculation and that the current modeling tools do not provide the information or tools to assess these types of potential changes.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.77	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County - multiagency letter & attachments	
Comment			
<p>The Fairfax County Police Department has identified the need for the installation of Uninterruptible Power Supplies (UPS) to select traffic signals in the area. These selected signals would have Battery Back Systems (BBS) installed which would permit 8-12 hours of operation. Having these signals with UPS would be extremely useful in the event of a natural disaster or other event during which power is lost in the Fort Belvoir area or the main travel routes to and from the post. Darkened signals per Virginia Code would be treated like 4 way stops. This would cause considerable traffic congestion in the event of an evacuation. The FCPD would not have sufficient staffing in the event of widespread power loss, especially with other associated emergency duties in the event of a natural disaster or other significant national emergency event, to control traffic manually. Even the deployment of existing portable generators would be prioritized throughout the county and quickly used up.</p> <p>We recommend installing UPS at the following locations:</p> <ul style="list-style-type: none"> • Richmond Highway (Route 1) from Old Mill Road to the Prince William County line • Route 7100 from Richmond Highway to Rolling Road • Beulah Street from Telegraph Road to Route 7900 • Loisdale Road from Route 7100 to Franconia Road (Route 644) • Backlick Road from Route 7100 to Route-7900 • Telegraph Road from Beulah Street to Richmond Highway (Route 1) <p>This would cover all major travel routes to and from the all Fort Belvoir locations (North and South Post, Proving Grounds and GSA). Placing UPS at these locations would give ample signal power supply for an evacuation of the area if needed. Any UPS that is installed would need to meet Virginia Department of Transportation (VDOT) specifications.</p>			
Response			
<p>This comment is beyond the scope of DoD. Fairfax County Police Department should coordinate their request with Fairfax County DOT and VDOT.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.78	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County - multiagency letter & attachments	
Comment			
<p>TRANSPORTATION—IMPACTS OF MITIGATION MEASURES</p> <p>Pages 4-85 and 4-86 identify a series of road network improvements that could be pursued to mitigate impacts of the preferred alternative as they relate to the proposed BRAC relocations. As noted earlier, there is a need for firm commitments to the pursuit of needed mitigation efforts. It is also notable, though, that the DEIS indicates that detailed design studies and potential NEPA studies would need to be pursued for these mitigation measures. It is our view that, because the impacts of the mitigation measures will be directly associated with the BRAC actions, the impacts of these mitigation measures should be considered comprehensively with the impacts of the BRAC alternatives. The implications of any of the alternatives to natural resources have not been fully enumerated in the DEIS because the impacts of the mitigation measures are not being considered.</p> <p>If it is the Army’s intent to proceed with separate NEPA documentation for various transportation improvements, what is the Army’s execution plan on developing the NEPA documentation for these projects?</p> <p>One of the suggested mitigation measures for the preferred alternative and City Center alternative is the extension of Neuman Street to provide access from the Franconia-Springfield Parkway into EPG. It is noted that “existing residences and a building used as a church” would need to be removed. Pages 4-18/19 and Pages 4-22/23 indicate that 19 residences and the church “would be changed from their current designations.” We assume that this means the residences and church building would need to be taken and feel that this impact should be presented more directly in the EIS. Another impact of this new access point would be traffic and noise impacts to residences that would remain near Neuman Street. How much increased traffic would use this road? Would any houses remain along this road? What noise level increases would be experienced by remaining noise sensitive receptors? Yet another impact would be the need for a new EQC crossing on the EPG site. Has this been factored into the EQC impacts that are reported for these two options? The EIS should more carefully and critically assess the effects of the proposed Neuman Street access.</p> <p>It should be noted that access to EPG through Neuman Street is contingent on the construction of the interchange at Neuman Street and the Franconia-Springfield Parkway. If the Army commits to building this interchange, the county would need to approve a Comprehensive Plan Amendment to allow the connection of Neuman Street into the EPG site. The Army should coordinate with staff from the county’s Department of Transportation regarding the pursuit of such a Plan Amendment.</p>			
Response			
<p>The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies, design work, and NEPA as required. As suggested in comments received from FHWA, the Army will address the process and schedule for implementation of selected mitigations in the ROD. Funding of transportation projects will also be addressed in the ROD. The timeline will be considered during preparation of the ROD. The progression of the main BRAC EIS to site-specific NEPA analysis for mitigation measures is consistent with the process of tiering. The text in Section 4.3.4.4 has been revised to indicate that Neuman Street access is dependent on the interchange at the Parkway. Further studies would also include coordination with the County Staff for required Plan Amendment.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.79	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.10 Socioeconomics		Fairfax County - multiagency letter & attachments	
Comment			
<p>HOUSING</p> <p>The DEIS discusses the numbers of housing units in the area and suggests that the available housing stock will be sufficient to accommodate the BRAC growth. Broad, countywide housing data are presented in support of this position. It is not clear, though, what the more localized housing effects of the BRAC relocations would be, particularly relating to affordability of housing.</p> <p>The proposed land use plan would increase the land area dedicated to family housing on both the North and South Posts. However, in the absence of an updated Real Property Master Plan it is unclear how much new housing is planned and how this additional housing could support BRAC. For example, has the number of active military personnel associated with the new hospital and other BRAC relocations been determined and, if so, how might new housing be created to allow some of these people to live on Post?</p> <p>While it is anticipated that most employees are currently housed, it is expected that new hires with lower incomes will in some cases need housing in the approximate area. Demand for adjacent housing could have an impact on affordability and growth in production. The provision of additional on post housing through the Real Property Master Plan update process could provide a reasonable alternative for military personnel assigned to BRAC relocations; however any additional housing constructed on post should serve a range of household incomes and include a minimum of 12 percent affordable or workforce housing. Further, any proposal to increase on-post housing should identify and mitigate associated impacts on roads, schools, other public facilities, utilities and natural resources.</p>			
Response			
Housing information is provided at the county level because it is too speculative to predict precisely where people would live at the suggested more localized level. The Army is not planning to construct more on-post housing as part of this action.			

Commenter	Comment #	Comment Type	Name
L 5	L5.80	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.12 Utilities		Fairfax County - multiagency letter & attachments	
Comment			
<p>The Utilities section of the DEIS notes the need for substantial water system upgrades and natural gas distribution network improvements for the preferred alternative, both on the Main Post and at EPG. The DEIS also indicates that a new, 4-acre substation would be needed at the EPG site for the preferred alternative or the City Center alternative. Have all utility system improvements been taken into account in the identification of impacts associated with the preferred alternative? Is the location of the on-site substation included within one of the "infrastructure" projects? If not, where would this substation be located, and what would be the associated impacts?</p> <p>Other alternatives will also have associated utility system improvement needs. Have all impacts of utility system improvements been incorporated into the analyses presented in the DEIS?</p>			
Response			
The Army is obtaining approval for a contract with Dominion that will allow the Army to plan EPG's power requirement. Once that is signed along with a Load Letter specifying requirements, Dominion will start the process to assess right-of-way requirements and proceed with the design and construction of transmission service to EPG and the construction of the substation. The government will provide a suitable site for the substation. It is assumed that additional environmental effects documentation will be needed for the transmission service. Appendix J of the FEIS identifies proposed utility corridors (i.e. water and gas lines) outside the footprints for the administrative facilities. These are considered part of Project #8 (Infrastructure) listed in Table 2-3 of the EIS. Environmental analysis was performed on these corridors in Section 4.12.2 and Appendix J (Table J-2).			

Commenter	Comment #	Comment Type	Name
L 5	L5.81	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.12 Utilities	4.12.4.2.2, page 4-404	Fairfax County - multiagency letter & attachments	
Comment			
The DEIS indicates that the existing sanitary sewer trunk line along Accotink Creek will be sufficient to accommodate flows from EPG; new collection system pipes, interceptors and appurtenances would be needed, though, to convey wastewater from EPG into this trunk line. Are we correct in assuming that the environmental impacts of these facilities have been addressed in the DEIS? If additional impacts are anticipated, they should be identified in the EIS.			
Response			
The following has been added to the text under Section 4.12.4.2.2 as the last sentence in paragraph 2: This would have short-term adverse effects due to construction activities and resulting interruptions to existing services during the construction period. The corridors have also been evaluated in the Joint Permit Application (wetland permit) submitted by the Army. See response to Comment L5.80 for environmental analysis of utility corridors.			

Commenter	Comment #	Comment Type	Name
L 5	L5.82	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.12 Utilities	4-391	Fairfax County - multiagency letter & attachments	
Comment			
Page 4-391 of the DEIS indicates that encroachments into the EQC for utility lines will be minimized and that utility crossings of the EQC on the EPG property will occur at road bridge crossings. We support and commend this sensitivity to the EQC			
Response			
As designs of projects are on-going, the Army has determined that while it will construct utility crossings across Accotink Creek at road crossings (as stated in the DEIS page referred to in the comment) to the maximum extent practicable, other unavoidable utility crossings are required. The proposed locations of these additional crossings are reflected in Appendix J Figure J-10.			

Commenter	Comment #	Comment Type	Name
L 5	L5.83	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.12 Utilities		Fairfax County - multiagency letter & attachments	
Comment			
The DEIS identifies needed improvements to the Franconia substation to accommodate electricity needs for EPG (and, for the City Center alternative, the GSA site). Will these upgrades have any impacts to residential properties in the area (in terms of visual/aesthetic conditions)? A plan identifying the location of this substation, surrounding uses, and improvements that would be needed should be provided, and the impacts of these improvements should be discussed in the EIS.			
Response			
The location of substation has been identified as part of Project 8, Infrastructure, as described in Section 2.2.2.3 and is shown on the maps in Appendix J as being in the south-central portion of EPG, east of Accotink Creek. However the design of the substation has not yet been developed enough to address the issues in the comment. As such, any effects on the visual/aesthetic conditions of the surrounding areas cannot be quantified or be commented on. Appropriate environmental documentation will be obtained for the proposed utility corridor that would connect the Franconia substation to the substation on EPG.			

Commenter	Comment #	Comment Type	Name
L 5	L5.84	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.12 Utilities		Fairfax County - multiagency letter & attachments	
Comment			
Would any new communication towers be needed, either on the Main Post or at EPG? If so, where would such towers be located? How high would they be? Would they be visible from residential properties?			
Response			
No communication towers are planned under the BRAC action at this time.			

Commenter	Comment #	Comment Type	Name
L 5	L5.85	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.12 Utilities		Fairfax County - multiagency letter & attachments	
Comment			
The DEIS notes that BRAC actions will most likely consume all of Fort Belvoir's capacity for water and sewer service. What will be the implications in terms of long-range master planning of further development on the post?			
Response			
To accommodate infrastructure improvement needs arising from additional development at the Post, Fort Belvoir would evaluate the available infrastructure with respect to these utility services and negotiate for additional capacities for potable water and sanitary sewer services with the respective agencies of Fairfax County. Additional infrastructure development beyond BRAC would also be the subject of future NEPA analysis.			

Commenter	Comment #	Comment Type	Name
L 5	L5.86	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.12 Utilities		Fairfax County - multiagency letter & attachments	
Comment			
Fairfax Water, which would provide public water service for the EPG property, has provided the following guidance:			
<ul style="list-style-type: none"> • Access to public water for the EPG site will be provided on a retail basis in accordance with the "Rules and Regulations for the Furnishing of Water Service" and the effective "Schedule of Rates, Fees, and Charges." Both documents are available from Fairfax Water or may be viewed at www.fairfaxwater.org. • Fairfax Water will own, operate and maintain all water system infrastructure necessary to serve facilities located on the EPG site. • Prior to construction, site plans for the EPG shall be submitted to Fairfax Water and the Fairfax County Fire Prevention Division for review and approval. Minimum submittal requirements include: <ul style="list-style-type: none"> o Preliminary Site Plan—depicting the horizontal water main alignment relative to other utilities and structures. The plan should include proposed main sizes, along with valve, hydrant and meter locations. o Final Site Plan—depicting both horizontal and vertical water main alignments. The final site plan should include required test hole information demonstrating appropriate utility clearances. o Easement Plats—Pipelines owned by Fairfax Water not located in public rights-of-way must have a corresponding easement agreement and property plat. Pipelines owned by Fairfax Water located on Federal property must be provided with an alternative permit agreement and plat. • Fairfax Water intends to incorporate an increase in pipeline diameter up to 24-inches within select mains installed as part of the EPG development. Fairfax Water will contribute the cost to increase pipe diameters from the minimum required to meet development needs to 24-inches to construct a contiguous 24-inch water main across the EPG site from Backlick Road to Rolling Road. • Public water for facilities constructed on the Main Post will be supplied by Fairfax Water on a wholesale basis through existing metered connections. Wholesale water purchases shall be in accordance with the existing Water Supply Agreement between Fairfax Water and Fort Belvoir. As a wholesale customer, Fort Belvoir is responsible for water distribution facilities on the Main Post, including water storage for demand equalization, fire protection and emergency supply. 			
Response			
Comment noted. Thank you for your interest. Your comment will be made part of the administrative record of the action.			

Commenter	Comment #	Comment Type	Name
L 5	L5.87	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.10 Socioeconomics		Fairfax County - multiagency letter & attachments	
Comment			
<p>TRAILS Our scoping comments presented a series of issues and recommendations pertaining to nonmotorized transportation, and some of these issues were not addressed in the DEIS. We reiterate our scoping comments:</p> <ul style="list-style-type: none"> • The EIS should include a map of planned pedestrian and bicycle trails and demonstrate how they will connect to those shown on the adopted Countywide Trails Plan. Development of appropriate segments within and adjacent to Fort Belvoir should be examined. Furthermore, trails along Richmond Highway and the Richmond Highway/Telegraph Road connector road as well as the Potomac Heritage Trail should be identified and incorporated onto the map of planned trails. The EIS should identify mechanisms through which the new trails will be funded and constructed. • The EIS should address the extent to which pedestrian and bicycle connections will be provided between on-post and/or near-post housing and on-site employment areas. • The EIS should address the extent to which pedestrian connections and facilities (e.g., bus shelters) will be provided in order to facilitate transit use by new and existing employees. Note—we acknowledge that the DEIS identified “appropriate accommodation” of transit riders and others arriving on foot through the provision of on-post pedestrian paths among a number of potential transportation demand management efforts. • The EIS should address the extent to which new office buildings will be designed to accommodate bicycle commuting (e.g., secure parking facilities, locker and shower facilities). Note—we acknowledge that the DEIS included these ideas among a number of potential transportation demand management efforts that could be pursued to mitigate transportation impacts and encourage the facilitation of bicycle commuting through such efforts. • The Accotink Stream Valley provides a major greenway corridor through the Springfield area of Fairfax County. The Cross County Trail, a 40-mile trail that runs from the Occoquan River in Lorton to the Potomac River in Great Falls, traverses a portion of the Accotink Stream Valley. As the EPG site is developed, additional trails along the Accotink Stream Valley should be developed and planned to link up with the Cross County Trail to provide a link between the EPG area and the Springfield Community Business Center as well as Lake Accotink to the north. <p>As noted earlier, we have particular concerns regarding the Accotink Creek stream valley on the EPG site, as the proposed land use plan map identifies the entirety of the EPG site in the “Professional/Institutional” category and as it is not even clear that the stream valley will be accessible to the public. We continue to stress the need for dedication of the EQC area to the county’s Park Authority and the provision of a stream valley trail in this area.</p> <p>In addition to the major regional trail systems noted in our scoping comments, there are other such trail systems in the area, including the Interstate Route One Bikeway and the Fairfax County Parkway Trail among others. All of these trails are identified on the county’s adopted Trails Plan, and we recommend that Fort Belvoir’s planning efforts (including BRAC) incorporate trails consistent with the Trails Plan.</p> <p>The EIS should include a map of planned pedestrian and bicycle trails and demonstrate how they will connect to those shown on the adopted Countywide Trails Plan. Development of appropriate segments within and adjacent to Fort Belvoir should be examined. Furthermore, trails along Richmond Highway and the Richmond Highway/Telegraph Road connector road as well as the Potomac Heritage Trail should be identified and incorporated onto the map of planned trails.</p> <p>The National Park Service has advised county staff that, as part of the mitigation for the project, the Park Service encourages completion, between Mount Vernon and the Occoquan National Wildlife Refuge, of a pedestrian, bicycling and water trail network as segments of the Potomac Heritage National Scenic Trail, including construction of a segment of the Potomac Heritage National Scenic Trail similar in function to the plan completed by the U.S. Army Corps of Engineers in 1996. (See, e.g., Eglin AFB and Avon Park AFR along the Florida National Scenic Trail.) Completion of the network would help substantially to address the increased demand for recreational opportunities resulting from implementation of the BRAC recommendations, as well as provide transportation alternatives in the vicinity of the post. In particular, the network should include a non-motorized connection to and including the planned U.S. Army Museum, contributing to the network of nationally-significant sites in the Trail corridor.</p>			
Response			
<p>Trails are addressed in cumulative effects section of the EIS. Mitigation has been added to Section 4.14.5. A trail plan will be included in the upcoming Fort Belvoir Master Plan Update.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.88	Local Agency	Gerald Connolly
Section	Page Number	Organization	
Other		Fairfax County - multiagency letter & attachments	
Comment			
<p>Figure 2-7 identifies some sort of use along the northern edge of EPG a short distance west of Backlick Road. What will this use be? A parking area? What will be the impacts of this facility to the residential area to the north—will there be visual impacts? Will there be lighting impacts associated either with this use or the broader EPG development? Will vehicle exhaust be of potential concern? The EIS should provide more graphical and descriptive details regarding plans for this area and the potential impacts associated with these plans.</p> <p>The county’s Comprehensive Plan recommends that a vegetated buffer at least 100 feet in width be retained along the northern boundary of EPG, to be supplemented with additional landscaping as needed. How much of a tree save area will be retained between the development and the residential area? Will there be overall lighting impacts associated with the EPG development, particularly to the residential area to the north? Does the Fort Belvoir Installation Design Guide follow county requirements pertaining to lighting (i.e., use of full cut-off fixtures)? Details are needed and are not provided in the aesthetics/visual resources section.</p>			
Response			
<p>Figure 2-7 shows conceptual building layouts for EPG and Main Post. No particular inferences should be drawn concerning specific peripheral or adjacent land uses or activities on the basis of this conceptual rendering. The county's Comprehensive Plan encompasses a projected development of the eastern portion of EPG, with three high-intensity mixed-use nodes having 4.5 million square feet. The county recommendation for buffering appears to be in that context. As design work progresses, the Installation Design Guide will be followed, and it is anticipated that a natural buffer satisfactory to the county will be retained.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.89	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources		Fairfax County - multiagency letter & attachments	
Comment			
<p>We are concerned about adverse effects to all cultural resources which are potentially eligible, eligible and listed on the National Register of Historic Places and to the Historic Overlay Districts and other historic properties and sites. Responsibilities under Section 106 of the National Historic Preservation Act need to be fulfilled for all applicable resources. As a local government, Fairfax County is a consulting party by-right and requests to participate in the Section 106 process including the development of the Programmatic Agreement.</p> <p>The DEIS characterizes adverse effects to cultural resource as being minor but recognizes that assessments of adverse impacts will “depend on the exact location of the proposed projects and the specific design details of the projects.” The DEIS notes that “many of these project details cannot be determined until Fort Belvoir initiates the project design process” and that “until these details are developed, the exact nature and extent of adverse effects cannot be determined.” The DEIS then summarizes potential effects to cultural resources in very general terms. We are concerned that any conclusions regarding the “minor” nature of potential impacts to cultural resources may be premature. Potential effects to cultural resources could comprise adverse effects that are much greater than minor (Page 4-298). The statement “Long-term minor adverse and beneficial effects could occur to historic properties as a result of implementing the Preferred Alternative land use plan” is misleading. There could be more substantial adverse impacts resulting from construction. Reference should be provided as to how the exact nature and extent of adverse effects will be identified and addressed. Will this be done through a programmatic agreement?</p> <p>There should be a table in the EIS that enumerates ALL archaeological sites discovered on the post with their Smithsonian Trinomial numbers (state site numbers). The table should include the site numbers, names of the sites, periods to which the sites date, level of investigation, and assessment of significance. The EIS should identify, for each alternative, which of these sites may be impacted. With the limited information provided (including lack of information on archaeological sites and the gross scale of the map), it is impossible for the reviewer to assess the potential adverse effects to cultural resources. The DEIS indicates that a list of sites is available in the Integrated Cultural Resources Management Plan, however, unless the reviewer is provided with the ICRMP, review is difficult. Site information needs to be provided either in the DEIS or in the DEIS Appendices. This is a significant omission.</p> <p>The Fairfax County Park Authority would also like the Army to provide an interpretive plan including brochures, signage, exhibits, Web sites, etc.</p>			
Response			
<p>Sections 4.9.2.3.2 and 4.9.2.3.3 describe that Section 106 consultation with the SHPO and interested parties, and development of a programmatic agreement would be conducted prior to initiating BRAC-related activities. The Army invites you to be included in the consultation process.</p> <p>The Section 106 process and the programmatic agreement would define how the nature and extent of potential effects to historic properties would be determined.</p> <p>The matter raised regarding a site table represents a level of detail unnecessary to adequately understand relevant issues. Sufficient information is presented to characterize the nature and extent of potential impacts to cultural resources and these impacts are comparable across the alternatives. Site numbers have been added to the text for potentially impacted archaeological sites.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.90	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources		Fairfax County - multiagency letter & attachments	
Comment			
<p>Page 4-288 indicates that no landscape or viewshed surveys have been conducted for the EPG or GSA sites. Why? Will such surveys be performed? Are noise and lighting impacts of concern at either of these sites?</p>			
Response			
<p>These studies have not been required for previous Section 106 consultation processes. The studies needed for Section 106 consultation will be determined on a project-by-project basis in consultation with the SHPO and interested parties. No change was made to the text. Noise and lighting impacts to off-site historic properties are not a concern in this analysis due to the absence of such properties near the EPG or GSA Parcel. Studies to occur during the Section 106 process will address this in more detail.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.91	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources		Fairfax County - multiagency letter & attachments	
Comment			
<p>The discussion of known archaeological sites on page 4-289 states that “. . . the GSA Parcel has not been surveyed for archaeological resources, the parcel has been heavily disturbed by construction of the buildings (all warehouses) and parking areas, and by construction of the adjacent I-95 corridor.” We feel that this statement is misleading. There are no recorded sites because there has been no archaeological survey. In heavily urbanized areas, where there is intense development, National Register eligible and listed archaeological sites remain in areas that are “islands of preservation.” Deep features, such as cellar holes, trash pits, wells and cisterns, are often found intact beneath paved parking areas. Unless there is documentation of wholesale grading to sterile subsoil across this parcel, we would not concur that the parcel can be written off on the basis of disturbance. Archaeological survey should be done to determine if sites are present.</p>			
Response			
<p>The EIS states that it is “unlikely” that intact resources are present, which is justified on the basis of current information. Section 106 consultation will determine the identification efforts needed at this location. Text has been modified in Sections 4.9.4.1.1 and 4.9.4.2 to reflect the “unlikelihood” for intact archaeological resources.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.92	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources		Fairfax County - multiagency letter & attachments	
Comment			
<p>It should be noted that any disturbance to burials in any of the cemeteries on the post (regardless of their National Register status) is subject to the provisions of the Virginia Antiquities Act, Code of Virginia, Section 10.1-2305 and/or any other applicable Army regulations. This Act was put in place to protect historic cemeteries and in order to treat cemeteries and human remains with dignity. Should any burials be discovered or scheduled to be disturbed during construction, work should stop immediately and the Virginia Department of Historic Resources should be contacted.</p>			
Response			
<p>Although no cemeteries would be impacted by the Preferred Alternative as identified in Section 4.9, discovered human remains would be treated in accordance with applicable statutes and regulations.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.93	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources		Fairfax County - multiagency letter & attachments	
Comment			
<p>Figure 4.9-1 on page 4-291 displays historic resources on and near the Main Post of Fort Belvoir but does not display cultural resources near the EPG site. It would appear that the Region of Influence may have been extended three miles from the Main Post but not three miles from the EPG site. Has the three mile area around the EPG site been taken into consideration? If not, why not? There are several heritage resource sites within a three mile radius of EPG which need to be taken into consideration.</p>			
Response			
<p>Sections 4.9.1.3 and 4.9.1.4 explain the Areas of Potential Effect for the EIS analysis. These APEs were applied to Fort Belvoir, EPG, and the GSA Parcel. An arbitrary 3-mile radius was not used for the analysis. No known historic properties are located near the EPG or GSA Parcel. No change was made to the text.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.95	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources		Fairfax County - multiagency letter & attachments	
Comment			
On page 4-292, the Area of Potential Effect (APE) relating to architectural resources does not appear to be clear and well defined. How was the APE determined? What criteria were used to determine and define close proximity? How does this compare to the APE for archaeological resources cited on page 4-289?			
Response			
The APE was developed using very general information known about the various proposed BRAC activities. This APE is sufficient for characterizing the nature and extent of potential effects on cultural resources. When conducting project specific Section 106 consultation, the APEs will be determined by Fort Belvoir in consultation with the SHPO and interested parties using much more specific project information. No change was made to the text.			

Commenter	Comment #	Comment Type	Name
L 5	L5.96	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources		Fairfax County - multiagency letter & attachments	
Comment			
The discussion of beneficial effects of the Town Center alternative on cultural resources (page 4-306) suggests that a redesignation of some areas from "Administration & Education" to "Residential" would be beneficial in that it would be easier to screen residential uses than nonresidential uses. This has not proven to be true in practice with the Residential Communities Initiative project. The inclusion of specific standards in the programmatic agreement would be useful in furthering the goal of screening sensitive cultural resources from adjacent residential development. In order to provide a minimum standard 50' buffer area for adequate screening, the following steps are suggested: 1) preserve existing vegetation and topography that currently serves as a buffer; and 2) introduce new plantings, berming and/or fencing.			
Response			
Comment was noted. Thank you for your interest and these ideas. Your comment will be made part of the administrative record of the action. There is no new residential development proposed in this alternative for the BRAC action.			

Commenter	Comment #	Comment Type	Name
L 5	L5.97	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources		Fairfax County - multiagency letter & attachments	
Comment			
Table 4.9-10 on page 4-316 summarizes potential impacts associated with the various land use plan alternatives, but the table does not provide any information for the preferred alternative. In addition, information on this table appears to conflict with other tables in this section, and clarification is needed regarding how the land use plan impacts may differ from the BRAC-specific impacts. For example, several of the BRAC projects identified in Table 4.9-7 on page 4-307 would have potential adverse effects on the Friends Meeting House and Burial Ground, but Table 4.9-10 suggests that the Town Center land use plan would not have any adverse impacts to this site. There are similar questions regarding the relationship between Table 4.9-10 and impacts identified for other BRAC options.			
Response			
Throughout the EIS, the land use plan effects are assessed separately from the BRAC-related specific projects. The potential effects of the proposed action land use plan update are presented in Section 4.9.2.1. The purpose of the table, as explained in the first paragraph of Section 4.9.7.1, is to compare the alternatives with the Preferred Alternative. The effects for the BRAC-specific projects are tabulated in Table 4.9-11. No change was made to the text.			

Commenter	Comment #	Comment Type	Name
L 5	L5.94	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources		Fairfax County - multiagency letter & attachments	
Comment			
<p>In the discussion of the Interwar Period on page 4-284, the DEIS cites the following: “. . . standardized architectural plans for installations throughout the nation” “. . . design philosophies of City Beautiful and Garden City influences with a more traditional collegiate approach, resulting in a landscape that maintained practicality while responding to natural surroundings in a flexible and aesthetic manner” “Despite significant expansion throughout the 20th century, particularly in the northern portion of the installation, the historic landscape plan of the southern core has remained intact.” It is suggested that these design principals and philosophies be adhered to in the new development as one way to protect the cultural resources and provide for compatible development. Fort Belvoir should consider including this idea in the Programmatic Agreement.</p>			
Response			
<p>Your comment was noted. Thank you for your interest. Your comment will be made part of the administrative record of the action. The suggested matters may be considered for inclusion in the Programmatic Agreement.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.98	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources		Fairfax County - multiagency letter & attachments	
Comment			
<p>In Table 4.9-11 on page 4-318, Davison Army Airfield buildings are noted as potentially eligible for the National Register. Will a study be conducted of these buildings? Also, there is a need to include a symbol for auditory effects in addition to direct physical effects, indirect physical effects and visual effects. Page 4-296 notes that Section 106 of the National Historic Preservation Act specifically includes audible and atmospheric elements as negative effects.</p>			
Response			
<p>Before initiating any of the proposed activities, Section 106 consultation, and associated identification of historic properties, would be conducted by Fort Belvoir in consultation with the SHPO and interested parties. No potential for auditory effects was found during the EIS analysis. If there is a potential for these effects for a project, Fort Belvoir would make a determination in consultation with the SHPO and interested parties.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.99	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.7 Water Resources		Fairfax County - multiagency letter & attachments	
Comment			
<p>WATER RESOURCES/STORMWATER MANAGEMENT/WATER QUALITY CONTROLS: The proposed development concept would result in significant increases in impervious cover and potentially significant increases in stormwater runoff peak flows and volumes. However, we feel that, in light of the magnitude of the mandated BRAC relocations to Fort Belvoir, this concept reflects general sensitivity to stormwater management and water quality issues through the concentration of new development within relatively compact development envelopes; the use of structured parking is of particular note and is worthy of commendation. We further applaud the suggestion on page 4-233 that post-construction best management practices be implemented that exceed state and local requirements for the management of stormwater runoff. Since much of Fort Belvoir was constructed with little or no stormwater management, the implementation of such measures would greatly reduce the likelihood of further water quality degradation. We recommend that Fort Belvoir pursue stormwater management retrofitting of existing developed areas that have not been controlled to date.</p> <p>The DEIS does not provide guidance as to how stormwater management measures will be provided but instead acknowledges that these details will need to be developed during the design of the proposed projects. We are concerned that, without careful integration of stormwater management measures into the development design, it is possible, if not likely, that additional clearing and grading will be needed and that there may be additional encroachments into EQCs, RPAs and wetlands beyond what has been anticipated to date. Table 4.7-8 on page 4-228 identifies drainage problems in the areas of the proposed preferred alternative project sites (and similar tables are provided for the other build alternatives), but there has not been a determination of how these problems will be addressed through stormwater management efforts. In order to ensure that appropriate controls are provided (and that these controls can be sited to avoid impacts to RPAs and EQCs), more work, at least conceptually, should be done up front and concepts should be presented as part of the EIS review. Otherwise, it is not clear that impacts to vegetated communities, RPAs, EQCs, and wetlands will be limited to what is presented in the DEIS.</p> <p>We feel that stormwater management plans need to be developed at this time and request the Army to share plans of suggested stormwater management facilities with the county once these plans are developed. We feel that it is essential that stormwater management measures will be provided that are consistent with county requirements regarding stormwater management, Chesapeake Bay Preservation Areas, Floodplain Regulations, Erosion and Sediment Control requirements and adequate outfall (including recently-adopted requirements for proportional improvement to downstream outfalls). Consistent with the Virginia Erosion and Sediment Control Regulations (4VAESO.30-40.19) and Stormwater Management Regulation (AVAC3.20.81), Fort Belvoir should ensure that downstream channels and properties will be protected from erosion and damage due to increases in volume, velocity and peak flow. This can be accomplished through various land management practices including the low impact development (LID) practices referenced in the DEIS. Floodplain elevations should not be raised as a result of the proposed development. If stormwater management concepts are not presented in the Final EIS, a commitment is needed to ensure that stormwater management facilities will not create significant additional environmental impacts beyond what is described in the DEIS (particularly in terms of vegetative communities, RPAs, EQCs and wetlands).</p> <p>All construction activities should incorporate erosion and sediment controls that will be sufficient to ensure that downstream areas will be protected from sediment and other construction materials that may be present. Stormwater runoff volumes and peak flows should be controlled from the initial stages of land disturbance in order to protect downstream areas from erosion due to increased peak flows and runoff volumes.</p>			
Response			
<p>Supportive comments are noted and appreciated. As noted in the response to Comment L5.23, best management practices for stormwater effects and management plans are addressed in the DEIS to an adequate level of detail. BMPs typically would be an inherent part of project design and implementation, and their funding would be included in general project costs. The Army would comply with all relevant and applicable federal, state, and local requirements to help ensure the Army's proper stewardship of natural resources, including compliance with all requirements in Fort Belvoir's MS4 permit; compliance would also extend to contractors, who would be required to submit a VSMP permit application.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.100	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.7 Water Resources		Fairfax County - multiagency letter & attachments	
Comment			
<p>STREAM PROTECTION/FLOODPLAINS/RESOURCE PROTECTION AREAS</p> <p>The Town Center and City Center alternatives seem to minimize impacts to water resources in that both of these alternatives concentrate the proposed development in relatively small areas. However, we are unable to draw more definitive conclusions due to uncertainties regarding the future disposition of areas that will remain undeveloped as a result of BRAC (i.e., would the areas that remain open due to the concentration of development under any of the BRAC options ultimately be developed anyway under the land use plan redesignations?)</p> <p>The DEIS provides inconsistent information regarding impacts to Resource Protection Areas. Tables 4.6-27 and 4.8-11 identify differing RPA impacts for the Town Center alternative and for the Satellite Campuses alternative.</p> <p>There are significant potential impacts to RPAs, and we recommend that these impacts be mitigated through the establishment of vegetated buffer areas elsewhere on the post (or on nearby sites if there is insufficient restoration capacity on-post) that are at least equal to the areas of encroachment.</p> <p>No stream channels should be filled in, relocated, or channelized. If such impacts are unavoidable, the EIS should address how they will be mitigated. Mitigation/compensation should occur as close to the areas of impact as possible.</p>			
Response			
<p>Tables 4.7-27 and 4.8-11 have been made consistent. The EIS recognizes the potential for more pronounced local effects on RPAs, however, installation wide, the effects are relatively minor because less than 0.1 percent of RPAs would only be affected by unavoidable road and utility crossings and not from building construction. Effects would be minimized to the maximum extent practicable by the measures identified in Section 4.7.2.4.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.101	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.7 Water Resources		Fairfax County - multi agency letter & attachments	
Comment			
<p>STREAM PROTECTION/FLOODPLAINS/RESOURCE PROTECTION AREAS</p> <p>Page 4-204 indicates that Fort Belvoir will be evaluating streams using Fairfax County’s perennial streams assessment protocol during project planning. We recommend that all streams on the Main Post and EPG be identified as either perennial or non-perennial using the county’s protocol. County staff is available to assist with training and/or field work regarding this protocol. RPA boundaries should be determined based on these perennial stream mapping efforts, and all streams should be protected with at least 100 feet of undisturbed forest buffer areas along each side of the stream. It should be recognized that RPA impacts may vary from what is presented in the DEIS because of possible uncertainties regarding the locations of perennial streams on the post.</p>			
Response			
<p>Comment noted and offer of County assistance is appreciated. RPAs on EPG and the hospital site on the Main Post were field delineated for perenniality/non-perenniality using the County’s protocol in January. As stated in the response to Comment L5.100, the EIS recognizes the potential for more pronounced local impacts to RPAs; however, installation-wide, the impacts are relatively minor because they would affect less than 0.1 percent of RPAs and would only result from unavoidable road and utility crossings and not from building construction.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.102	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.7 Water Resources		Fairfax County - multiagency letter & attachments	
Comment			
<p>STREAM PROTECTION/FLOODPLAINS/RESOURCE PROTECTION AREAS</p> <p>Page 4-223 indicates that “riparian areas” are shown in Figure 4.7-1, but riparian areas beyond RPAs are not identified. We note that RPA requirements call for 100-foot buffer areas along both sides of perennial streams (a 35-foot figure is referenced, in general, for riparian areas on page 4-223). We support all efforts to protect and restore riparian buffers to headwaters areas of stream systems above RPAs.</p>			
Response			
<p>The RPA requirement is 100 ft (not 35 ft), although riparian areas regulated by Fairfax County can extend beyond this limit. The text reference in the comment describes additional riparian areas beyond RPAs as defined by Fort Belvoir, not RPAs. Figure 4.7-1 of the DEIS was updated in the PFEIS to show the referenced Riparian Areas beyond RPAs.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.103	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.7 Water Resources		Fairfax County - multiagency letter & attachments	
Comment			
<p>STREAM PROTECTION/FLOODPLAINS/RESOURCE PROTECTION AREAS</p> <p>Page 4-220 notes that Fort Belvoir may propose, as part of its MS4 permit, efforts to identify and correct stormwater runoff-related problems and to pursue stream corridor restoration projects. We encourage the Army to assess the quality of stream channels on Fort Belvoir and EPG, quantifying specific morphological characteristics and human impacts such as bank height, head cuts and stream crossings. Where areas of degraded stream quality and/or riparian buffer areas are identified, we encourage the Army to restore these reaches and/or buffer areas. We encourage Fort Belvoir to pursue watershed management planning efforts similar to those being undertaken by the county and invite Fort Belvoir to send a representative to serve on the steering committees for the Accotink Creek, Pohick Creek and Dogue Creek Watershed Management Plans. We expect to start the public participation piece of each of these plans in the winter and spring of 2008.</p>			
Response			
This comment was noted and the county invitation is appreciated.			

Commenter	Comment #	Comment Type	Name
L 5	L5.104	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.7 Water Resources		Fairfax County - multiagency letter & attachments	
Comment			
<p>STREAM PROTECTION/FLOODPLAINS/RESOURCE PROTECTION AREAS</p> <p>There are significant areas of 100-year floodplain on the site. Fairfax County has more stringent floodplain requirements than federal minimum criteria. For example, the county requires, in most cases, no rise in Base Flood Elevation. Floodplain elevations should not be raised as a result of the proposed development.</p>			
Response			
The floodplain maps shown in the FEIS are consistent with Fairfax County designated floodplans and local requirements regarding Base Flood Elevation will be adhered to.			

Commenter	Comment #	Comment Type	Name
L 5	L5.105	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.13 Hazardous Waste		Fairfax County - multiagency letter & attachments	
Comment			
<p>HAZARDOUS MATERIALS</p> <p>For sites subject to contamination by hazardous materials, cleanup levels will need to depend on the use(s) anticipated for the area(s) in question. The DEIS notes that some sites have had remediation sufficient to qualify as closed using health based risk assessments in conjunction with limitations on the future use of the areas. We are concerned that some of these areas may be subject to disturbance and uses that are inconsistent with these limitations. The DEIS identifies the possibility of developing Health and Safety Plans for each affected site in order to confirm that these sites will have had the appropriate remediation before any new land uses and any construction activities that may result in exposures to hazardous materials. Firmer commitments to such mitigation efforts are needed. County staff should be provided with copies of Health and Safety Plans for review and approval and should receive certification at the conclusion of any site remediation with a Health and Safety Plan. The certification would state that all “constituents of concern” will have been removed from the site or all remediation work has been completed as described in the Health and Safety Plan.</p> <p>The county should be provided with specific documentation on any site that has continuing limitations.</p>			
Response			
The Army has openly worked with Virginia DEQ and EPA on each of these sites. All reports and findings have been reviewed and have received concurrence from the regulatory agencies. Fort Belvoir maintains records and locations of these units in their GIS. All proposed development is screened against these sites to notify planners of potential effects. This in-place system ensures development consider these sites during the planning process. The Army will continue to work with the appropriate agencies until another agency is granted authority in these matters.			

Commenter	Comment #	Comment Type	Name
L 5	L5.106	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.13 Hazardous Waste		Fairfax County - multiagency letter & attachments	
Comment			
<p>HAZARDOUS MATERIALS The DEIS identifies several types of potentially hazardous sites in the EQC and western portion of the EPG site but provides little information regarding the status and condition of Petroleum Storage Areas and Solid Waste Management Units at EPG.</p> <p>For purposes of risk assessment, the Accotink Creek EQC on the EPG site and western portion of EPG should be evaluated based on a recreational use in any area where use of the area remains to be determined. As noted earlier, we recommend dedication of the EQC and western portion of the EPG site for public park and recreation purposes. Prior to any transfer of land for public use, all Petroleum Storage Areas, Solid Waste Management Units, Ordnance and Explosives areas and any other hazardous materials site must be cleaned and tested to ensure the safe use by the public.</p> <p>The EIS should identify the extent to which, if any, ordnance/explosives could be located in the EQC of Accotink Creek and what it would take to find and remediate such occurrences.</p>			
Response			
This information is discussed in Section 4.13.1.1 PSAs and Section 4.13.1.3 SWMUs. The proposed action does not include use of the EQC as a recreation area and is therefore beyond the scope of the EIS.			

Commenter	Comment #	Comment Type	Name
L 5	L5.107	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA		Fairfax County - multiagency letter & attachments	
Comment			
<p>REMOTE INSPECTION FACILITY: Figure 2-5 identifies a large area within the southwestern portion of the EPG site that would be used for a Remote Inspection Facility, and Figure 2-7 depicts a fairly large structure and significant road network in this area. Yet, aside from a discussion of a “potential security operating scenario for EPG” (page 4-134) that would generally limit visitor and truck access to the EPG site to the entrance off of the Fairfax County Parkway/Rolling Road interchange (an implicit recognition of the need for some sort of facility in this area) and a brief reference to topographic impacts of the preferred alternative (page 4-190), we were not able to find any references to this facility in the DEIS. The facility is not identified as a proposed construction project in Table 2-3 or Figure 2-6, and no mention is made of it in the identification of on-post development not related to BRAC (pages 5-8 and 5-9). This facility would appear to have the potential to cause a broad range of adverse environmental impacts, and it is unclear if the impact information provided (e.g., acres of loss of vegetation communities, additional impervious cover, etc.) accounts for this facility. Clarification is needed.</p>			
Response			
The Remote Inspection Facility is part of Project Number 65416, NGA Administrative Facility in Section 2.2.2.3, as well as Project 8, Infrastructure, and identified as part of Project 8 on Appendix J maps. Text has been added throughout the EIS discussing further analysis of the RIF. The RIF has also been included in the Joint Permit Application (wetland permit) submitted by the Army.			

Commenter	Comment #	Comment Type	Name
L 5	L5.108	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA		Fairfax County - multiagency letter & attachments	
Comment			
<p>DISPOSITION OF VACATED FACILITIES: The DEIS doesn't clearly address what will happen to facilities that will be affected by departures from Fort Belvoir (see the note on Table 2-2 on page 2-12). Will all of these facilities be re-used by incoming BRAC workers? If not, what will happen to the vacated facilities? What will happen to the existing DeWitt Hospital? Could vacated space be leased to public or private sector entities that are currently not at Fort Belvoir, thereby further increasing employment population at the post? If there is any potential for further increases in employment resulting from the re-use of vacated buildings, it would be appropriate for the EIS to address the magnitude and potential impacts of these additional on-post populations.</p>			
Response			
The principal facilities affected by departing personnel are the Army Materiel Command relocatables on Gunston Road. These would be used by incoming Army Lease personnel. Future uses of DeWitt Community Army Hospital have not been determined. Potential uses of other facilities, possibly in partnership with the private sector under enhanced use leasing, are beyond the scope of the EIS. Such uses would be subject to additional NEPA analysis.			

Commenter	Comment #	Comment Type	Name
L 5	L5.109	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA		Fairfax County - multiagency letter & attachments	

Comment

We have the following comments regarding Section ES.6.2 on pages ES-7 and ES-8:

- The first sentence states: “The BRAC action would be expected to have significant effects on the transportation system...” This should state (as does page 4-84) that it will have significant adverse effects, since that is the key finding of the document. Other environmental effects are given as minor or moderate.
- The transportation effects are contingent on assumptions as to future improvements to the network. The Fairfax County Parkway is a network assumption that has huge ramifications and there is no mention in the document of the very real possibility that the missing piece will not be completed by BRAC 2011 deadline. The I-95 Fourth Lane project, expected to be in place by 2011, has been repeatedly delayed over the past decade. At this time, the future of I-95 improvements and potential HOT lanes is uncertain.
- A statement in the second paragraph reads: “Overall, regional travel patterns would be expected to be identical...” This appears to be an overstatement based on the Daily Screen Line Volumes in Fig. 4.3-19 and 4.3-16 showing higher volumes crossing the Occoquan, in the Preferred Alternative 2011 compared to the No Action Alternative.
- Add the following to the third sentence of the second paragraph: “...excepting over saturation of traffic on I-95 extending both to the north and south of these facilities.”
- The following sentence is included in the third paragraph: “Mitigation to address this issue is likely to require a Fairfax County Parkway cross-section in this area of eight lanes, including a two-lane reversible high-occupancy vehicles (HOV) facility.” The County’s Comprehensive Plan does not include HOV lanes on this section of the Parkway.
- Despite the statements that are made in the 5th paragraph, the preferred alternative would also require further work within active traffic zones. Maintenance of traffic and congestion management should therefore be major elements in the adoption of this alternative.
- In the seventh paragraph, “acceptable LOS and delay” should be defined.

Response

Traffic effects would be adverse. The Army can only assume that transportation projects will be completed pursuant to the published documents of their proponents. Regional travel patterns would, overall, remain fairly constant. Should it find such to be desirable, the County could provide in its comprehensive plan for eight-lane cross sections, as described. The Army agrees that maintenance of traffic and congestion management would be required concurrently with the alternative’s adoption. Definitions of LOS are provided in Section 4; the Executive Summary includes only major information.

Commenter	Comment #	Comment Type	Name
L 5	L5.110	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA		Fairfax County - multiagency letter & attachments	

Comment

Page ES-11 characterizes the long-term cultural resources effects of all of the alternatives as “minor and beneficial.” It is not clear that the effects to cultural resources would be minimal because specific effects are not identified.

Response

Text in Section 4.9 provides the rationale for characterization of effects.

Commenter	Comment #	Comment Type	Name
L 5	L5.111	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA		Fairfax County - multiagency letter & attachments	

Comment

Page ES-15 identifies an unavoidable loss of about 113 acres of “natural habitat” for the preferred alternative, yet Table 4.8-4 identifies 164 acres of impact to vegetative communities. This discrepancy should be clarified.

Response

This discrepancy has been clarified through re-analysis of available data and inclusion of newly available data such as revised footprint boundaries. The document now states 310 acres of vegetative areas would be developed.

Commenter	Comment #	Comment Type	Name
L 5	L5.112	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA		Fairfax County - multiagency letter & attachments	
Comment			
Hazardous Materials effects (page ES-15) also include increased vehicular transport of hazardous materials to and from the site on area roadways and resultant increases in potential public risk (e.g., spills from crashes).			
Response			
The Executive Summary contains only major points of the EIS. Full discussion of impacts related to hazardous materials is provided in Section 4.13.			

Commenter	Comment #	Comment Type	Name
L 5	L5.113	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA		Fairfax County - multiagency letter & attachments	
Comment			
In the section of the Executive Summary addressing cumulative transportation effects (page ES-16), the DEIS states: "On post facilities projects, taken together, would be expected to have negligible effects on Fort Belvoir area traffic". With congested traffic conditions, these projects can be expected to further degrade operations in the localized network. Also, the transportation improvements proposed as mitigating measures will themselves have impacts during construction.			
Response			
The Army agrees that transportation improvements will effect traffic during their construction.			

Commenter	Comment #	Comment Type	Name
L 5	L5.114	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA		Fairfax County - multiagency letter & attachments	
Comment			
Page ES-16 states: "Cumulative effects to land use upon implementation of the Fairfax County Comprehensive Plan over the next 5 years would be negligible if all approved/programmed roadway improvements are realized." Is it realistic to assume that all of these projects will be completed in this time frame?			
Response			
The Army declines to comment on the ability of Fairfax County or others to complete projects within predicted time frames.			

Commenter	Comment #	Comment Type	Name
L 5	L5.115	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA		Fairfax County - multiagency letter & attachments	
Comment			
The discussion of the cumulative effects on aesthetic and visual resources on page ES-19 notes that the building of the Operations Security Evaluation Group Training Facility on the Southwest Area would result in the clearing of some of the forested area. Yet the discussion of cumulative effects on biological resources on page ES-17 does not mention this impact.			
Response			
The Army agrees that biological resources in the Southwest Area would be affected. Further quantification or qualification would become known upon appropriate NEPA analysis.			

Commenter	Comment #	Comment Type	Name
L 5	L5.116	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA		Fairfax County - multiagency letter & attachments	
Comment			
On page ES-20 within the section heading "E.S. 8.1 Transportation," and in relevant chapters thereafter, a section on non-motorized transportation should be included: "Non-motorized transportation. Some employees at the post and in the region could prefer to walk, jog and use a bicycle as a form of transportation. Mitigation would require coordination and planning with Fairfax County agencies, the Metropolitan Washington Council of Governments, and other agencies followed by construction of additional pedestrian and bicycling facilities in the region.			
Response			
The Army will indicate in the Record of Decision its decisions with respect to commitment to and funding for a TDM coordinator, who would be responsible for pursuing off-post trails.			

Commenter	Comment #	Comment Type	Name
L 5	L5.117	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA		Fairfax County - multiagency letter & attachments	
Comment			
Page 1.4 notes that completion of the Real Property Master Plan update will require a separate environmental impacts analysis; can attendant transportation mitigation actions be incorporated into the same document?			
Response			
The revised Real Property Master Plan will have a comprehensive transportation component.			

Commenter	Comment #	Comment Type	Name
L 5	L5.118	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA		Fairfax County - multiagency letter & attachments	
Comment			
Under the criteria stated in Section 1.6.3 (page 1-14 of the draft EIS), the Defense Access Roads Program should fund most mitigation improvements in the vicinity of the EPG location.			
Response			
Comment noted. The extent to which the DAR Program can certify relevant transportation projects for funding remains to be determined.			

Commenter	Comment #	Comment Type	Name
L 5	L5.119	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA		Fairfax County - multiagency letter & attachments	
Comment			
Page 2-2 identifies improving connectivity as a major planning principle. More detail is needed in the EIS regarding how these transit connections are to be made.			
Response			
Improved connectivity is cited as a planning principle. Major considerations affect transit (for instance, creation of a transit center and use of shuttle services to public transportation hubs), other transportation issues, and quality of life.			

Commenter	Comment #	Comment Type	Name
L 5	L5.120	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA		Fairfax County - multiagency letter & attachments	
Comment			
Table 2-1 on page 2-4 provides a comparison of land use areas in the current plan for Fort Belvoir with the proposed land use plan. Because of the proposed plan category redesignations, it is not possible to understand the implications of the acreage figures presented in this table. There should be better analyses of the land use category changes in terms of how the current categories (by acreage) would fit into the new designations. This was done for the Administration and Education/Research and Development designations (the second bullet on page 2-3) and should be done for all categories.			
Response			
The purpose of Table 2-1 is to indicate the relative sizes (acreage allocations) of the land use categories of the 1993 plan and the proposed plan. This is also done for the alternative land use plans identified in Section 3.			

Commenter	Comment #	Comment Type	Name
L 5	L5.121	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA	2-8	Fairfax County - multiagency letter & attachments	
Comment			
Page 2-8 notes that the site currently housing Woodlawn Village would be used in the future for a non-BRAC related community use yet to be determined, and the proposed land use map would designate a “community” use in this area. However, Woodlawn Village would retain its “residential” designation for all other alternatives. Why would there be a difference in future plans for Woodlawn Village among the alternatives?			
Response			
Total acreages made available for the various land use classifications would be different among the alternatives. Belvoir New Vision Planners offered that, for the Preferred Alternative, future use of the Woodlawn Village area should be designated as community.			

Commenter	Comment #	Comment Type	Name
L 5	L5.122	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA	2-8	Fairfax County - multiagency letter & attachments	
Comment			
Page 2-8 discusses constraints to development but does not define what would be a high enough level of constraint to cause an area to be considered unbuildable. Clarification should be provided.			
Response			
Examples of constraints include shrink-swell soils, wetlands, or steep slopes. Because of the varied physical characteristics of lands at Fort Belvoir, no single standard for unbuildable levels can be propounded. Each instance must be examined individually and take into account site-specific characteristics and engineering and design options.			

Commenter	Comment #	Comment Type	Name
L 5	L5.123	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA	2-9	Fairfax County - multiagency letter & attachments	
Comment			
The natural constraints shown on Figure 2-3 (page 2-9) do not appear to incorporate all Resource Protection Areas (at least on the EPG site) as identified on Figure 4.7-1 (page 4-205).			
Response			
Taken together, Figures 2-3 and 4.7-1 identify relevant constraints at Main Post and EPG. The figures do not appear to be contradictory but, rather, supplementary. Appendix J has been added and shows more detailed figures with project footprints and impacts.			

Commenter	Comment #	Comment Type	Name
L 5	L5.124	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA	2-14	Fairfax County - multiagency letter & attachments	
Comment			
The “estimated impervious acreage” column on Table 2-3 (page 2-14) raises questions as to why this information is not applicable to the proposed Corps of Engineers Project Integration Offices, U.S. Army Nuclear and Chemical Agency Support Facility, and modernized barracks.			
Response			
Table 2-3 lists estimated permanent impervious surfaces resulting from BRAC construction projects. The USACE would occupy temporary, relocatable facilities (trailers) which would eventually be removed upon completion of construction. Section 4.7.2 of the EIS recognizes the impacts of this project on impervious surfaces and stormwater runoff. The USANCA and barracks modernization projects involve interior renovations that would not alter existing conditions (no increase in impervious surfaces).			

Commenter	Comment #	Comment Type	Name
L 5	L5.125	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA	2-15	Fairfax County - multiagency letter & attachments	
Comment			
Figure 2-6 (page 2-15) should be updated to reflect a “7” at South Post, as is indicated in the text for temporary USACE facilities.			
Response			
The figure has been revised as indicated in the comment.			

Commenter	Comment #	Comment Type	Name
L 5	L5.126	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA	2-16	Fairfax County - multiagency letter & attachments	
Comment			
Figure 2-7 on page 2-16 identifies brown shading as potential structures. Yellow and gray shading is also shown on the EPG site, but there is nothing in the legend of this graphic to indicate what these shades represent. If one or both of these shades is meant to reflect parking areas, how will parking be provided for uses proposed for the Main Post (in that no yellow or gray shading is shown for the Main Post)? More site detail for all areas of proposed construction would be appropriate as, even with complete legends, it would be difficult to evaluate impacts of proposed development envelopes at the scale provided.			
Response			
This figure presents conceptual site layouts. Gray areas representing parking areas have been added to the legend. An appendix of figures (Appendix J) has been added that provides an opportunity to assess effects within building envelopes.			

Commenter	Comment #	Comment Type	Name
L 5	L5.127	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA	2-22	Fairfax County - multiagency letter & attachments	
Comment			
Pg. 2-22 notes the proposal for an access control point along Richmond Highway across from Pence Gate. More analysis is needed regarding the effects of this new control point (including a new grade separated interchange, signal and turn lanes) on Richmond Highway.			
Response			
Design of the access control point will be developed and refined as the project matures. The Army will cooperate with the County, VDOT, and other federal agencies as appropriate on required studies, analysis, and design work.			

Commenter	Comment #	Comment Type	Name
L 5	L5.128	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use		Fairfax County - multiagency letter & attachments	
Comment			
Section 4.2.1.2 of the DEIS (pages 4-3 through 4-8) describes the various land areas on Fort Belvoir (the GSA site is also discussed). A description of activities at the Humphreys Engineering Center should also be provided in this section. Though not a part of the BRAC program, this site represents a large land area immediately adjacent to Fort Belvoir and is clearly in the Region of Influence. Impacts of the use of this site should be considered as part of the cumulative impacts assessment. Cumulative growth, environmental and transportation impacts need to be evaluated.			
Response			
HEC is not administratively managed by Fort Belvoir and, thus, is not dealt with in this section. A brief description has been added to cumulative impacts in Section 5.1.1.			

Commenter	Comment #	Comment Type	Name
L 5	L5.129	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use	4-12	Fairfax County - multiagency letter & attachments	
Comment			
Page 4-12 of the DEIS states that there are two issues of concern in considering effect on areas outside Fort Belvoir: transportation and environmental stewardship. This list should also include recognition of quality of life issues such as housing and education.			
Response			
Page 4-12 states that transportation and environmental stewardship are two major issues involved. Although quality of life is important, it would not be affected as much as other areas. It is still thoroughly addressed in section 4.10.			

Commenter	Comment #	Comment Type	Name
L 5	L5.130	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use	4-15	Fairfax County - multiagency letter & attachments	
Comment			
The gross floor area of the Metro Park development should be included in the discussion towards the bottom of page 4-15.			
Response			
Gross Floor area has been added for Metro Park Development.			

Commenter	Comment #	Comment Type	Name
L 5	L5.131	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use	4-16	Fairfax County - multiagency letter & attachments	
Comment			
Page 4-16 notes that the Southeast Fairfax Development Corporation has identified 32 “projects of significance” in the Mount Vernon Planning District but that most of these projects are “Small renovation and building addition sites that, in some cases, are confined to façade beautification and signage.” We question whether these projects are truly “of significance.” Off-post and on-post data collection should be comparable (only include additional gross square footage, acres converted to impervious surface, increases in intensity/density, creation of additional vehicle trips, etc).			
Response			
Data used for analysis are sufficient to encompass coinciding effects in adjacent areas. The data used was provided by Fairfax County. Characterization of the projects as “projects of significance” was by the Southeast Fairfax Development Corporation. Completely “parallel” data are not available.			

Commenter	Comment #	Comment Type	Name
L 5	L5.132	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use	4-18	Fairfax County - multiagency letter & attachments	
Comment			
On page 4-18, the DEIS states: "Re-designation of the South Post golf course from Outdoor Recreation to Professional/Institutional would allow siting of the new hospital; its easy accessibility would benefit numerous outpatients and visitors." While it is clear that the redesignation would be needed for this particular site, the correlation between this re-designation and easier accessibility is unclear.			
Response			
The proposed preferred location of the hospital would be centrally located on Fort Belvoir making it closer to the majority of housing on the installation compared to sitings on EPG and North Post. Its easy access from Route 1 would serve the larger community which travels to Fort Belvoir for medical care.			

Commenter	Comment #	Comment Type	Name
L 5	L5.133	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use	4-18	Fairfax County - multiagency letter & attachments	
Comment			
On page 4-18, the DEIS states: "Designation of the northwest corner of EPG as Professional/Institutional would mean that the Army intends to retain this parcel in lieu of transferring it to Fairfax County." In addition to being in conflict with the county's Comprehensive Plan (as noted earlier in our comments), this action would ultimately result in additional transportation impacts. We also note that the preferred alternative would designate the entirety of EPG as Professional/Institutional and not just the northwest corner.			
Response			
The project siting process on Fort Belvoir evaluates both compliance with land use designations and other potential issues with sites. Areas identified as sensitive (i.e., RPAs, wetlands) still retain their regulatory protections. See the response to Comments L1.4 and, regarding the County Comprehensive Plan, L5.34.			

Commenter	Comment #	Comment Type	Name
L 5	L5.134	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use	4-18	Fairfax County - multiagency letter & attachments	
Comment			
Page 4-18 states: "Long term minor beneficial effects would be expected" in terms of land use. The loss of future parkland at EPG for Fairfax County with the Army retaining the parcel in the northwest corner is not beneficial for the county.			
Response			
The statement from the EIS reflects the overall effects determination for land use, including analyzing the effects of implementing an updated land use plan on Fort Belvoir. The fourth paragraph of Section 4.2.2.1 of the FEIS recognizes the future use of the northwest EPG parcel. Designation of this area in the County Comprehensive Plan does not coincide with Army goals. See the response to Comment L5.34.			

Commenter	Comment #	Comment Type	Name
L 5	L5.135	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use	4-19	Fairfax County - multiagency letter & attachments	
Comment			
Page 4-19 notes that seven million square feet of new parking space would be added under the preferred alternative "primarily" in structured parking. Does this number (7,000,000 square feet) represent the 10,700 spaces listed in table 4.2-2? Will any parking be provided through surface lots? If so, what is the general proportion of surface to structured parking in terms of land coverage? We commend the Army for proposing structured parking facilities and feel that structured parking should be stressed throughout the post in order to minimize impervious surfaces and negative aesthetic effects of surface parking lots. Details of projects should include the types and amounts of parking to be provided or a separate list of parking structures that identifies the buildings each parking area serves.			
Response			
The parking requirements will be 60 percent of the workforce. The majority of this would be in the form of structured parking, but a final percent would be established during the design process.			

Commenter	Comment #	Comment Type	Name
L 5	L5.136	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use	4-19	Fairfax County - multiagency letter & attachments	
Comment			
Towards the bottom of page 4-19, the DEIS states: "Use of EPG as the principal location for siting of BRAC-related facilities would alleviate traffic problems..." This is an overstatement, since it creates other problems, such as the possible need for eight lanes on the Fairfax County Parkway, other access points off I-95, etc., especially if the proposed mitigation measures are not in place by 2011.			
Response			
It is assumed that transportation mitigation, specifically the Fairfax County Parkway extension, will be in place by 2011. Placement of some projects on EPG would cause less traffic issues than concentrating all construction on Main Post.			

Commenter	Comment #	Comment Type	Name
L 5	L5.137	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use	4-22	Fairfax County - multiagency letter & attachments	
Comment			
On page 4-22, the DEIS states: "Subsequent high density development at EPG and GSA Parcel might lead the County to limit or reduce the density of other development projects in the vicinity of those locations." This would only be true if transportation or other impacts were not satisfactorily addressed by the Army. Both the EPG (in nodes) and GSA are designated in the Comprehensive Plan for much higher development than proposed in the City Center Alternative (.50 and .70 FAR, respectively).			
Response			
The Army adopts the information provided in the comment. Accompanying analysis and prediction of effects is unchanged.			

Commenter	Comment #	Comment Type	Name
L 5	L5.138	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use	4-23	Fairfax County - multiagency letter & attachments	
Comment			
The third paragraph on page 4-23 states that intensities of .50 FAR at EPG and 0.70 at the GSA site would be out of character with the surrounding area. As noted above, the Comprehensive Plan recognizes the potential for these development intensities; we don't view carefully designed, high intensity development within portions of the EPG site as being in conflict with the character of the area (although poorly designed development at these intensities could be).			
Response			
The Army adopts the information provided in the comment. Section 4.2.4 has been updated. Accompanying analysis and prediction of effects is unchanged.			

Commenter	Comment #	Comment Type	Name
L 5	L5.139	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use	4-23	Fairfax County - multiagency letter & attachments	
Comment			
The fourth paragraph on page 4-23 notes that the GSA site is at least a half mile away from the Franconia-Springfield Metro station and that employees and visitors would need to walk this distance to get from the Metro station to any development provided on the GSA site. While the need for access improvements to the GSA site is recognized, it is not clear why the DEIS does not assume that a shuttle system could be established to provide for a relatively short ride between the GSA site and the transit station. We see a real benefit to the GSA site in its proximity to rail and feel that the discussion on page 4-23 is unduly negative.			
Response			
Text has been edited to note shuttle service as one of the proposed mitigating actions listed in the transportation section 4.3.5.4.			

Commenter	Comment #	Comment Type	Name
L 5	L5.140	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County - multiagency letter & attachments	
Comment			
Pages 4-30 and 4-33 discuss transportation analyses and design, but it is not clear who is performing these operations analyses and studies and whether any commitments to perform these have been verified.			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.			

Commenter	Comment #	Comment Type	Name
L 5	L5.141	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County - multiagency letter & attachments	
Comment			
On pages 4-37 and 4-39, the DEIS identifies roadways within the existing regional transportation network. Not all of these facilities are in full use. The fact that Route 7100 is not completed through the EPG is very pertinent, and this critical gap between Rolling Road and I-95 should be mentioned. Also, the network was greatly altered by the closure of Beulah Street, John Kingman Road, and Woodlawn Road through Fort Belvoir; these roads are not actually "serving" the area.			
Response			
Section 4.3.2.1 identifies existing off-post roadways, including the section of Beulah Road that is off-post. Section 4.3.2.1 does not mention Kingman Road nor Woodlawn Road. See Section 4.3.2.2 for discussion of on-post roads.			

Commenter	Comment #	Comment Type	Name
L 5	L5.142	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County - multiagency letter & attachments	
Comment			
Table 4.3-1 on page 4-43 reinforces the concerns regarding impacts to I-95 traffic, as it shows 2/3 of existing Fort Belvoir employees are coming from locations to the south of the installation.			
Response			
See Figure 4.3-6 for a Fort Belvoir existing population density map. 38 percent of the workers on the installation live south of the Occoquan River. There is 37 percent in southern Fairfax County, but that also includes Fairfax south of Braddock Road (south-western corner of the county) and the portion of the county between Fort Belvoir and the Beltway.			

Commenter	Comment #	Comment Type	Name
L 5	L5.143	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation	4-43	Fairfax County - multiagency letter & attachments	
Comment			
Peak period travel time contours (Figures 4.3-7 and 4.3-8 on pages 4-45 and 4-46) are useful but represent a typical day (without major incidents) and thus do not capture the highly variable travel times that affect people's decisions on relocating.			
Response			
These are typical travel times. The Army agrees that some days travel time will be better and some days worse.			

Commenter	Comment #	Comment Type	Name
L 5	L5.144	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County - multiagency letter & attachments	
Comment			
The section of the DEIS on “Available Capacity and Performance” (pages 4-50 through 4-57) shows that capacity to the south is severely constrained—this is a major transportation concern for the BRAC action.			
Response			
This section presents existing conditions. Also note that some WHS and GSA live to the south today and are in existing traffic stream.			

Commenter	Comment #	Comment Type	Name
L 5	L5.145	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County - multiagency letter & attachments	
Comment			
Table 4.3-4 under represents freeway capacity; a range of 1900 – 2300 would be more accurate. The capacity for HOV facilities is too high—the typical capacity for HOV facilities is 1,600 vehicles per lane per hour, where the goal is to maintain a high level of service in order to make it attractive to potential carpoolers. We also suggest that an intermediate category of expressway/parkway, with a range of 1600-2100 be incorporated. There is a need for clarification regarding “Capacity per lane by facility type.” Do these figures reflect a derived capacity developed for planning purposes rather than Highway Capacity Manual (HCM) base capacity (e.g., freeway vehicles per hour of 1,600-1,800 vs. HCM 2,300-2,400)?			
Response			
The volumes have been revised for freeway as 1,600 to 2,000 vph; HOV volumes unchanged. Please note that the HCM numbers are passenger cars equivalents, not vehicles per hour, as in this section. NCHRP 414 states that the capacity of the HOV system is 1,700 vph for a barrier separated system like I-395 to ensure quality service flow and speed, which is reflected under the explanation. The capacity reflects an operational review of the system, examining the through-put of congested systems.			

Commenter	Comment #	Comment Type	Name
L 5	L5.146	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation	4-50	Fairfax County - multiagency letter & attachments	
Comment			
Table 4.3-3 (page 4-50) does not include trips that pass through the study area. Therefore, it would appear that the traffic totals that are shown underrepresent the magnitude of the impact.			
Response			
A column was added to this table to include total number of trips that pass through the study area. This was done for existing, No Action, Preferred, Town Center, City Center and Satellite Campuses Alternatives tables			

Commenter	Comment #	Comment Type	Name
L 5	L5.147	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation	4-54	Fairfax County - multiagency letter & attachments	
Comment			
The isolated intersection level of service (LOS) figures presented on page 4-54 do not fully reflect operating conditions in a congested network. Also, there are no details in the appendix on assumptions used (e.g., signal timings). Do the LOS analyses reflect conditions for a consistent peak hour (given in Table 4.3-5 as 7:15-8:15 a.m., and 4:30-5:30 p.m.) or LOS for peak hour operations at specific intersections?			
Response			
The intersection analysis follows the Highway Capacity Manual methodology. Typical volumes were developed for the intersections analyzed looking at the peak hour of that intersection, but the typical peak hour for the area intersections is the time period noted.			

Commenter	Comment #	Comment Type	Name
L 5	L5.148	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation	4-54	Fairfax County - multiagency letter & attachments	
Comment			
The basic assumptions for the capacity analysis were not provided (page 4-54, Table 4.3-5), making it impossible to comment on the reasonableness of the capacity analysis.			
Response			
The intersection analysis follows the Highway Capacity Manual methodology. The county was involved in developing and approving the methodology. To list all basic assumptions for each and every step will add pages to the EIS. If the county desires, the basic assumptions and files can be provided separately.			

Commenter	Comment #	Comment Type	Name
L 5	L5.149	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation	4-58	Fairfax County - multiagency letter & attachments	
Comment			
Page 4-58 identifies spot improvements in the area. Improvements to the intersection of Roberts Road and Braddock Road do not appear relevant; also, the current project at this location is for a right turn lane and not a left turn lane.			
Response			
The text has been revised per comment - changed left to right, so it reads "right turn lane."			

Commenter	Comment #	Comment Type	Name
L 5	L5.150	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation	4-60	Fairfax County - multiagency letter & attachments	
Comment			
In the "Improvements beyond the Constrained Long-Range Plan" on page 4-60, it is not clear what the intent of this project list is in the DEIS.			
Response			
The purpose was to show other desired projects identified by other studies that are not within the 6-year plan or the CLRP.			

Commenter	Comment #	Comment Type	Name
L 5	L5.151	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation	4-71	Fairfax County - multiagency letter & attachments	
Comment			
Page 4-71 identifies four intersections where improvements could potentially be needed for the No Action Alternative. We note that there are other intersections in Table 4.3-14 with LOS E and F and question why these intersections aren't listed. We also feel that more detailed operational studies might result in a list of additional needed intersection improvements.			
Response			
The list in the text on page 4-71 is part of a summary of the expected performance under a no action scenario is for illustrative purposes only. These intersections were identified and listed as they are of key interest to Fort Belvoir for the BRAC action. The selection of potential migration projects was developed by comparing performance under a no action scenario to the performance under the alternatives. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work, which will include more detailed analysis.			

Commenter	Comment #	Comment Type	Name
L 5	L5.152	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation	4-79	Fairfax County - multiagency letter & attachments	
Comment			
Page 4-79 discusses the transportation performance of the preferred alternative under expected conditions. Statements in this section affirm the need for initial construction of a six lane Fairfax County Parkway improvement. The transit mode split estimates in this section are conservative, and do not factor in higher transit demand if better services are provided to the site. The bottom of page 4-79 and top of page 4-80 note that concerns have been raised regarding the potential for probable “ripple effects” of induced employment and development in and near the study area, and that the current model cannot assess the impact of these ripple effects. Forecast traffic volumes, therefore, likely under represent actual future conditions.			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. The Study Team met with representatives from Fairfax County and VDOT to develop the land use plans that should be used. Through collaboration with and agreement from both agencies, it was determined that these future contractor tails represent speculation and that the current modeling tools do not provide the information or tools to assess these types of potential changes.			

Commenter	Comment #	Comment Type	Name
L 5	L5.153	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation	4-83	Fairfax County - multiagency letter & attachments	
Comment			
The first paragraph on page 4-83 contains the following sentence: “In the evening peak period, egress from EPG would be slow and spread over several hours. As a result, the effects on the regional transportation facilities would be limited as compared to the AM peak period.” This assumption is not substantiated anywhere in the report.			
Response			
PM exiting controlled by capacity of system to handle traffic exiting from EPG. If they cannot exit from EPG due to congestion on the roadways adjacent to EPG, then they remain "stuck" on EPG waiting to exit.			

Commenter	Comment #	Comment Type	Name
L 5	L5.154	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County - multiagency letter & attachments	
Comment			
We note that, in the discussion pertaining to all service concepts (pages 4-88 – 4-89), the expression “Peak Hour Buses” can be interpreted as either bus trips or vehicles. It is suggested that this expression be revised throughout this section to read “Peak Hour Bus Trips,” based on the text following the expression in each case.			
Response			
The text has been revised for this portion in sections 4.3.4.4, 4.3.5.4, 4.3.6.4, and 4.3.7.4 as requested to improve clarity.			

Commenter	Comment #	Comment Type	Name
L 5	L5.155	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation	4-86	Fairfax County - multiagency letter & attachments	
Comment			
Page 4-86 references improvements that would be provided to Beulah Street. Beulah Street was widened to four lanes per the county’s Transportation Plan; what else is anticipated? Clarification should be provided.			
Response			
Text revised to include widening, ITS applications, and other improvements (safety and signals) as needed. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.			

Commenter	Comment #	Comment Type	Name
L 5	L5.156	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation	4-87	Fairfax County - multiagency letter & attachments	
Comment			
The second paragraph on page 4-87 states that traffic traveling toward Fort Belvoir on regional facilities has a reverse commute on I-95/395 southbound in the morning, but many of those trips will connect to the Beltway, where congestion is bi-directional.			
Response			
The comment was noted.			

Commenter	Comment #	Comment Type	Name
L 5	L5.157	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation	4-87--4-89	Fairfax County - multiagency letter & attachments	
Comment			
<p>The discussion of transit measures on pages 4-87 through 4-89 is surprisingly general given how critical this issue is to the success of the BRAC relocations. Only very general thought has been given to how bus service could achieve a 5 or 10 percent mode split, the two scenarios described. No conceptual route maps are provided for the five service areas described. No tables outlining demand or capacity for these service areas are provided. No supporting table is provided in the appendix for the capital cost estimate (\$10 million to \$12 million) or the operating cost estimate (\$6 million to \$9 million) presented on page 4-89. Even with the disclaimer that “Detailed route and service planning would be conducted later,” it is reasonable to expect considerably more detail in conceptual plans.</p> <p>In the concept for a 10 percent mode share for the Main Post (page 4-88), the service referred to in the paragraph pertaining to western Fairfax County appears to be the Springfield – George Mason University Limited Stop service proposed in the 2003 Regional Bus Study (Washington Metropolitan Area Transit Authority). The activities required to implement this service have not been started, nor has implementation of this service been approved by either Fairfax County or WMATA. Similar bus service is referenced for other alternatives, and our concern applies to those references as well.</p> <p>In the concepts for 5 and 10 percent mode shares for the EPG site (pages 4-88 and 4-89) we have the following comments:</p> <ul style="list-style-type: none"> •U.S. Route 1 in Fairfax County: The service referred to is Fairfax Connector Route 171, one of the five most heavily used routes in the entire Connector network. It is unlikely that Fairfax County would lengthen the trip time of current passengers who utilize this route between Lorton and the Franconia-Springfield Metro to provide service to the EPG as well. The suggested alternative is to initiate a new service which would link the Lorton VRE station, park-and-ride lots near I-95 in Lorton, and the EPG on a 30-minute peak headway. The new service could be scheduled to meet Route 171 trips traveling in the same direction to provide the linkage from Huntington and Richmond Highway. •Western Fairfax County: The service referred to for the 10% mode share appears to be a combination of the Springfield – GMU Limited Stop service and the Route 50 Rapid Bus service proposed in the 2003 WMATA Regional Bus Study. The service referred to for the 5% mode share appears to be the Springfield – George Mason University Limited Stop service noted in the previous comment. The Route 50 service concept has been modified to operate as a standard limited-stop service rather than the “BRT light” Rapid Bus service; the resulting combined service has been further modified to directly serve the EPG. The activities required to implement this service have not been started, nor has implementation of this service been approved by either Fairfax County or WMATA. 			
Response			
<p>At this stage of the process, a conceptual plan for transit service has been developed that indicates the areas and levels of service required to achieve a 5 to 10 percent mode split. More detailed operational plans will be developed if the ROD adopts transit services as one of the mitigating actions. Other elements of the project, including site access, site circulation, and site security measures will have an impact on the final designs of the transit service. Only preliminary costing can be completed at this time, and will be revised as the service plans are updated and refined.</p> <p>The proposed concept of a limited stop bus service in the Route 50 corridor is based on the characteristics of the service area, the trip lengths involved, and the nature of the major arterials in the area. It was not based on any specific bus route identified in the WMATA study.</p> <p>The currently proposed service concepts are not meant to infer specific changes to existing services. In the case of Route 1, the concept is to add the equivalent of two additional peak buses worth of service. During the detailed planning phase, determinations will be made if this can best be achieved through adding buses to one or more of the existing routes in the corridor, by initiating a new route, or by implementing a major service restructuring in the corridor. It is also the case for Route 50 that the proposed concept does not specifically refer to any currently planned or proposed routes. Rather, this concept recognizes the need for some type of limited stop service with reduced travel times when compared to local bus service.</p>			

Commenter	Comment #	Comment Type	Name
L 5	L5.158	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County - multiagency letter & attachments	
Comment			
The discussion on pages 4-89 through 4-91 (Transportation Management Plan Framework) is general in nature and not oriented to the particulars of BRAC in any detailed way. There is only mention of what a TDM coordinator might do and inclusion of a rideshare facility as a mitigation measure. For example, there is no targeted rideshare mode target range described, and there is no description of mandatory TDM measures that might be implemented to achieve single occupant vehicle trip reductions.			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.			

Commenter	Comment #	Comment Type	Name
L 5	L5.159	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County - multiagency letter & attachments	
Comment			
On page 4-92, the following statement appears in the last column: "One full bus can carry 40 people, so would remove 40 SOV trips." This is not correct. A certain percentage of employees who will use transit when available might previously have carpooled.			
Response			
Text has been revised in Tables 4.3.23, 4.3.29, 4.3.34 and 4.3.39 to say "Based on MWCOG's average vehicle occupancy rate of 1.1, a bus carrying 40 passengers would remove 36 automobile trips."			

Commenter	Comment #	Comment Type	Name
L 5	L5.160	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.5 Noise	4-166	Fairfax County - multiagency letter & attachments	
Comment			
On page 4-166, the Alexandria Friends Meeting House is identified as a noise sensitive receptor. Because the introduction of audible elements that diminish the integrity of the property's significant historic features is an adverse effect, it is recommended that the Woodlawn Friends Meeting be given consulting party status in the Section 106 process.			
Response			
NAC category B, which represents moderately sensitive land uses, including picnic areas, recreation areas, playgrounds, active sports areas, parks, residences, motels, hotels, schools, churches, libraries, and hospitals, is independent of historical significance or status. Fort Belvoir has initiated Section 106 consultation with interested parties regarding the BRAC action, including the commenter.			

Commenter	Comment #	Comment Type	Name
L 5	L5.161	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.5 Noise	4-173	Fairfax County - multiagency letter & attachments	
Comment			
Page 4-173 indicates that one of the possible mitigation measures for noise would be a limitation on construction to "predominately occur during normal weekday business hours in areas adjacent to noise-sensitive land uses such as residential areas, recreational areas, and off-post areas." In no case should construction activities occur during times that are inconsistent with requirements of the county's noise ordinance (Section 108-4-1 of the Fairfax County Code).			
Response			
On-post noise related activities are not governed by the local noise ordinance. The Army would implement BMPs as outlined in the FEIS; they can be expected to alleviate most of the concerns noted in the comment.			

Commenter	Comment #	Comment Type	Name
L 5	L5.162	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.5 Noise	4-177	Fairfax County - multiagency letter & attachments	
Comment			
Page 4-177 notes that Davison Army Airfield would be closed and aircraft operations would potentially cease under the Satellite Campus Alternative in order to allow for the establishment of NGA facilities at this site. However, the DEIS also notes that "there would be no changes to aircraft operations" with the implementation of this alternative. Clarification is needed regarding the apparent conflict between these statements. Would there be a benefit in reduced noise impacts associated with the Satellite Campuses alternative?			
Response			
Thank you for your comment. The Army has incorporated the commenter's information into Section 4.5.5.2.3 of the FEIS.			

Commenter	Comment #	Comment Type	Name
L 5	L5.163	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.7 Water Resources	4-205	Fairfax County - multiagency letter & attachments	
Comment			
"Flood zones" identified in Figure 4.7-1 (page 4-205) do not include all floodplain areas as defined by the county's Zoning Ordinance, and floodplain areas described on page 4-223 may also not include all county-defined floodplains.			
Response			
As noted in the response to Comment L5.104, the floodplain maps shown in the FEIS are consistent with Fairfax County-designated floodplans.			

Commenter	Comment #	Comment Type	Name
L 5	L5.164	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.7 Water Resources		Fairfax County - multiagency letter & attachments	
Comment			
We encourage Fort Belvoir to apply the same watershed boundaries that are being applied by the county in its watershed planning efforts. This would consolidate the seven watersheds referenced in the DEIS (Accotink Creek, Accotink Bay, Pohick Creek, Pohick Bay, Dogue Creek, Gunston Cove and Potomac River) to the three watersheds referenced in county efforts (Accotink Creek, Pohick Creek and Dogue Creek). This would reduce any confusion regarding naming conventions and comparisons of drainage areas. In addition, we recommend that the Accotink Village area be included in Fort Belvoir's drainage study.			
Response			
The analysis framework presented in the DEIS is adequate for BRAC decision making and the scope of the EIS. Note that the broader watersheds (e.g., Dogue Creek) were further delineated as necessary for modeling and impact analysis purposes. The Army would endeavor to coordinate with Fairfax County's watershed planning efforts.			

Commenter	Comment #	Comment Type	Name
L 5	L5.165	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.7 Water Resources		Fairfax County - multiagency letter & attachments	
Comment			
We encourage the Army to discuss its role in the three Total Maximum Daily Loads for PCBs that are being developed (Accotink Creek, Dogue Creek and Pohick Creek).			
Response			
Added text to Section 4.7.1.2.2 naming these TMDLs: "VDEQ is currently developing TMDLs in accordance with the 10-year EPA consent decree schedule for waterbodies originally listed on the 1998 303(d) list, including TMDLs for PCBs for Accotink Creek, Dogue Creek, and Pohick Creek."			

Commenter	Comment #	Comment Type	Name
L 5	L5.166	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.7 Water Resources		Fairfax County - multiagency letter & attachments	
Comment			
We support the application of LID techniques of stormwater management, particularly in areas where there are sensitive habitats that rely on a groundwater source (e.g., acidic seepage swamp communities).			
Response			
The comment is noted and appreciated. LID techniques would be incorporated as discussed in Section 4.7.			

Commenter	Comment #	Comment Type	Name
L 5	L5.167	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.7 Water Resources		Fairfax County - multiagency letter & attachments	
Comment			
Section 4-7 of the DEIS identifies RPA impacts associated with Gunston Road improvements as follows: 4.8 acres, 2.7 acres, 4.9 acres, 2.7 acres, and 0 acres for the preferred, town center, city center, satellite campuses, and no action alternatives, respectively (even though page 4-65 identifies improvements to Gunston Road for the no action alternative). Why would there be differences among alternatives in these impacts?			
Response			
Reference to Gunston Road has been deleted. Infrastructure (Project #8) requirements vary among the alternatives, hence the differences.			

Commenter	Comment #	Comment Type	Name
L 5	L5.168	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources	4-282	Fairfax County - multiagency letter & attachments	
Comment			
On page 4-282, the sentence "The most common type of prehistoric site identified at Fort Belvoir is the lithic artifact scatter, but no diagnostic tools or ceramics have been recovered from these sites (Goodwin & Associates, 2001)" is misleading. This sentence states that most lithic scatters cannot be dated, but could lead the reader to believe that there were no prehistoric sites with diagnostic artifacts discovered on the property.			
Response			
The text in section 4.9.1.1.1 has been changed from 'The most common type of prehistoric site identified at Fort Belvoir is the lithic artifact scatter, but no diagnostic tools or ceramics have been recovered from these sites (Goodwin & Associates, 2001)' to 'The most common type of prehistoric site identified at Fort Belvoir is the lithic artifact scatter (Goodwin & Associates, 2001).'			

Commenter	Comment #	Comment Type	Name
L 5	L5.169	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources	4-287	Fairfax County - multiagency letter & attachments	
Comment			
Page 4-287 references the 2001 Integrated Cultural Resources Management Plan as well as a program-specific programmatic agreement signed by Fort Belvoir and the Virginia State Historic Preservation Officer in 2003. Fort Belvoir should ensure that the BRAC actions will not be in conflict with these efforts.			
Response			
The EIS notes that the selected BRAC action would be conducted in accordance with the ICRMP and in consultation with the Virginia SHPO.			

Commenter	Comment #	Comment Type	Name
L 5	L5.170	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources	4-288	Fairfax County - multiagency letter & attachments	
Comment			
Page 4-288 mentions 47 archaeological reports and 16 architectural studies. A listing of these reports should be provided in the references or in an appendix.			
Response			
There is no available comprehensive list, which is why the report states "more than 47 . . .". This statement is to let the reader know that studies have been conducted - a listing is not germane to the EIS analysis. Cultural resource reports are being posted on a Section 106 consultation FTP forum. The Army invites you to be a consulting party for the Section 106 process.			

Commenter	Comment #	Comment Type	Name
L 5	L5.171	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources	4-288	Fairfax County - multiagency letter & attachments	
Comment			
Page 4-288 references a 2006 historic resource survey and evaluation. Will this study be submitted to the State Historic Preservation Officer? Is there a timeframe for completion of the architectural surveys? How do the architectural surveys relate to BRAC?			
Response			
The Milner 2006 report referenced on page 4-288 of the DEIS has not yet been submitted to the SHPO for review. The EPG report (New South Associates, 2006) has been submitted to the SHPO for review and the SHPO has concurred with the findings. Text has been added to clarify this. Any further architectural surveys required for compliance with Section 106 for BRAC-related activities would be completed in consultation with interested parties and the Virginia SHPO.			

Commenter	Comment #	Comment Type	Name
L 5	L5.172	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources	4-288	Fairfax County - multiagency letter & attachments	
Comment			
Page 4-288 references a 2006 comprehensive architectural survey at EPG. County staff is interested in obtaining a copy of this survey. Concern has been expressed recently by the Virginia Department of Historic Resources regarding the sufficiency of survey information that has been provided to consulting parties under the Section 106 process. Fort Belvoir should provide all consulting parties with the comprehensive architectural survey.			
Response			
Fort Belvoir has initiated consultation with interested parties and the SHPO with regard to proposed BRAC-related actions, per Section 106 and 36 CFR 800.2. Survey information would be provided to those parties. The Army invites you to be included in the consultation process.			

Commenter	Comment #	Comment Type	Name
L 5	L5.173	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources	4-288	Fairfax County - multiagency letter & attachments	
Comment			
Page 4-288 notes several survey and cultural resource documentation efforts that are planned for future implementation. Will these efforts be completed prior to 2011? Will the areas subject to these efforts be affected by the proposed BRAC actions?			
Response			
There is some overlap between the areas included in the listed studies and areas that would be subject to BRAC-related activities. Any areas that would be in the Area of Potential Effect for proposed BRAC-related activities would be assessed for the presence of National Register-eligible properties and the Section 106 process complied with, before the activities taking place.			

Commenter	Comment #	Comment Type	Name
L 5	L5.174	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources	4-289	Fairfax County - multiagency letter & attachments	
Comment			
Page 4-289, Table 4.9-1 indicates the status of archaeological sites, but overall, this is a meaningless statistic, unless we know what the sites are.			
Response			
The table is presented to give the reader an idea of the number of sites identified and their status. For a complete list of sites, see the ICRMP.			

Commenter	Comment #	Comment Type	Name
L 5	L5.175	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources		Fairfax County - multiagency letter & attachments	
Comment			
Table 4.9-3 on pages 4-293 through 4-295 does not reference National Register-eligible World War I era temporary warehouses. Have these warehouses been demolished?			
Response			
These warehouses are part of and included in the Fort Belvoir Historic District.			

Commenter	Comment #	Comment Type	Name
L 5	L5.176	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources	4-296	Fairfax County - multiagency letter & attachments	
Comment			
We commend Fort Belvoir for considering properties listed on the Fairfax County Inventory of Historic Sites as potentially eligible for purposes of Section 106 (page 4-296).			
Response			
Comment noted. Thank you for your interest. Your comment will be made part of the administrative record of the action.			

Commenter	Comment #	Comment Type	Name
L 5	L5.177	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources	4-298	Fairfax County - multiagency letter & attachments	
Comment			
Page 4-298 includes references to local historic districts. These should be listed here (and throughout this section of the EIS) as historic overlay districts in order to distinguish them from National Register historic districts.			
Response			
This change has been made throughout the section.			

Commenter	Comment #	Comment Type	Name
L 5	L5.178	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources	4-301	Fairfax County - multiagency letter & attachments	
Comment			
The description of potential effects of project #4 (the hospital) within Table 4.9-6 on page 4-301 should recognize the potential for adverse effects on the Friends Meeting House and Burial Ground.			
Response			
Information available to the Army has been verified as accurate.			

Commenter	Comment #	Comment Type	Name
L 5	L5.179	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources	4-302	Fairfax County - multiagency letter & attachments	
Comment			
Page 4-302 of the DEIS notes that Fort Belvoir is in the process of developing a Programmatic Agreement for cultural resources. As a local government, Fairfax County is a consulting party by-right and requests to participate in the Section 106 process including the development of the Programmatic Agreement. In addition, the Fairfax County Park Authority wants to assist in or comment on the PA.			
Response			
Comment noted. Thank you for your interest. Your comment will be made part of the administrative record of the action.			

Commenter	Comment #	Comment Type	Name
L 5	L5.180	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources	4-303	Fairfax County - multiagency letter & attachments	
Comment			
The list of "General BMPs" to address cultural resources impacts of the preferred alternative (page 4-303) does not identify any actions to protect sites from construction noise/vibrations. Will any such actions be pursued?			
Response			
The need for specific measures to address noise and vibration effects would be assessed during project-specific Section 106 consultations. No change was made to the text.			

Commenter	Comment #	Comment Type	Name
L 5	L5.181	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources	4-303	Fairfax County - multiagency letter & attachments	
Comment			
On page 4-303, Section 4.9.2.3.2, the EIS should indicate that the Fairfax County Park Authority, Cultural Resource Management and Protection Section be included as a by-right consulting party on all Section 106 actions involving archaeological sites.			
Response			
The Army adopts the statement contained in the comment.			

Commenter	Comment #	Comment Type	Name
L 5	L5.182	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources	4-304	Fairfax County - multiagency letter & attachments	
Comment			
On page 4-304, the BMPs for potential adverse effects to architectural resources should address audible and atmospheric impacts. An additional measure could read: "Designing and locating new buildings, lighting and signage to minimize audible and atmospheric intrusion."			
Response			
Commenter's suggested text added to section 4.9.2.3.3 to address audible and atmospheric impacts.			

Commenter	Comment #	Comment Type	Name
L 5	L5.183	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources	4-304	Fairfax County - multiagency letter & attachments	
Comment			
Page 4-304 discusses a number of measures that could be included in a programmatic agreement being developed between Fort Belvoir and a number of other entities. Several items on this list do not appear to be addressed in the draft of this document. Clarification is needed.			
Response			
All of the items in Table 4.9-5 were included in the analysis conducted for the EIS document. The potential mitigation measures are included in those presented in Section 4.9.2.3. Your concern that these measures be included in the Programmatic Agreement has been forwarded to the Fort Belvoir personnel involved in drafting the PA.			

Commenter	Comment #	Comment Type	Name
L 5	L5.184	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources	4-318	Fairfax County - multiagency letter & attachments	
Comment			
Table 4.9-11 (page 4-318) should identify the sites of concern			
Response			
Specific sites that would be affected would be determined during the Section 106 consultation process. The level of detail needed to make that determination is not available.			

Commenter	Comment #	Comment Type	Name
L 5	L5.185	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources		Fairfax County - multiagency letter & attachments	
Comment			
We concur with the first two bullet items listed in the "General BMPs" section on page 4-320. Bullet item 3 should indicate that the Virginia Department of Historic Resources must be notified and work stopped in an area if human remains are found. This is a stipulation of the Virginia Antiquities Act, Code of Virginia, Section 10.1-2305.			
Response			
Compliance regarding human remains will follow federal statutes because Fort Belvoir is federal land. No change was made to the text.			

Commenter	Comment #	Comment Type	Name
L 5	L5.186	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.10 Socioeconomics		Fairfax County - multiagency letter & attachments	
Comment			
The analysis of the economic and social effects of the alternatives (beginning on page 4-332) would be easier to understand if definitions were provided for the terms used to categorize the impacts (i.e., short-term, long-term, minor, significant).			
Response			
Whether an effect is significant is determined by reference to its context and intensity. Given the wide latitude in which such context and intensity might have to be considered, the better practice is not to attempt to define "one-size-fits-all" for significant or minor effects. For example, the EIFS model effects are determined minor or significant if effects surpass a historical change, or threshold. The dollar impacts from a construction project can be seen for the limited life of the project, whereas effects from a change in population can be carried out over many years. Some persons might place great value on a park or other recreation facilities, whereas others might not make use of these facilities at all.			

Commenter	Comment #	Comment Type	Name
L 5	L5.187	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.11 Aesthetics	4-374	Fairfax County - multiagency letter & attachments	
Comment			
The discussion of aesthetic impacts on page 4-374 should identify whether or not the EPG development would be visible from I-95 and/or the Fairfax County Parkway			
Response			
A detailed description of the visual effects on EPG under the Preferred Alternative is in Section 4.11.2.2.3.			

Commenter	Comment #	Comment Type	Name
L 5	L5.188	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.12 Utilities	4-390	Fairfax County - multiagency letter & attachments	
Comment			
On page 4-390, the DEIS states that it is Army policy that, beginning in FY 2008, all vertical building construction projects, with the exception of major hospitals, will achieve the silver level of certification under the U. S. Green Building Council's Leadership in Energy and Environmental Design (LEED) program. Major hospitals will be required to attain LEED certification with a goal of the silver rating. We commend the Army for this commitment and would encourage the Army to ensure that energy efficiency will be an integral component of the LEED certification efforts for all new facilities that will be constructed per this action			
Response			
Comment noted. Thank you for your interest. Your comment will be made part of the administrative record of the action. In implementing BRAC, the Army will comply with current policy.			

Commenter	Comment #	Comment Type	Name
L 5	L5.189	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.11 Aesthetic & Visual	4-473	Fairfax County - multiagency letter & attachments	
Comment			
Page 4-473 describes numerous trails through the South Post area. Without a map, it is difficult to understand how these trails are accessed and interrelated. A planned trails map should be included in the EIS in order to demonstrate how on-site facilities tie into the county's trail system.			
There are many Major Regional Trail Systems planned by Fairfax County on the site and in the vicinity, such as the Potomac Heritage National Scenic Trail, the Interstate Route One Bikeway, the Fairfax County Parkway Trail and Cross County Trail. In addition, there are the Accotink Stream Valley Trail, the Pohick Stream Valley Trail, and major paved trails along Richmond Highway, Telegraph Road and Mulligan Road. These trails are region-wide and countywide trails providing recreational as well as transportation opportunities. Any trail system relating to the BRAC actions should consider and incorporate these trails.			
Trails should be provided consistent with the county's trails plan. Fort Belvoir should coordinate with Sheng Leu of the Department of Planning and Zoning (703-324-1380) regarding design, access and safety considerations.			
Response			
Fort Belvoir's upcoming Master Plan Update and associated NEPA documentation will provide information about the installation's trails and potential incorporation into regional trail systems.			

Commenter	Comment #	Comment Type	Name
L 5	L5.190	Local Agency	Gerald Connolly
Section	Page Number	Organization	
5 Cumulative Impacts		Fairfax County - multiagency letter & attachments	
Comment			
The off-post project list, Table 5-2 on pages 5-11 and 5-12, is outdated and over-counts the acreage of several projects. For example, the Laurel Hill golf course expansion is listed as 348.6 acres, but the expansion acreage is 42 acres and has been completed. The entire golf course is only 250 acres including the expansion. Also, the Spring Hill Senior campus is listed twice (it should be 46.8 acres total rather than listed as two separate projects totaling 106.5 acres) and the South County High School has been built and opened in 2005. An updated list would be more accurate, and the list should be edited to include only proposed projects that would have an effect on traffic, schools, environment etc. For map number 185, the project reference number should be 05-IV-10S			

Response
The mentioned points have been updated. The Cumulative Effects section aims to describe and analyze the general effects of the nearby projects that will be occurring at the same time. The list used was provided by Fairfax County.

Commenter	Comment #	Comment Type	Name
L 5	L5.191	Local Agency	Gerald Connolly
Section	Page Number	Organization	
Other		Fairfax County - multiagency letter & attachments	

Comment			
In Section 6, it would be useful to the reviewer to know for which section each of the preparers was responsible			

Response
Individual preparers' responsibilities have been added to Section 6.0.

Commenter	Comment #	Comment Type	Name
L 5	L5.192	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation	Appendix D	Fairfax County - multiagency letter & attachments	

Comment			
In Appendix D, the volumes in the diagrams are illegible—they are too small to read. The information on the CD is difficult to read as well.			
In Appendix D, volumes are missing for the Fairfax County Parkway extension through EPG. When were the counts taken (which month)?			

Response
Figures have been revised to improve readability. The counts were taken in 2006, and other sources and past studies were also used. Then the counts were balanced between intersections to develop the typical volumes for the study intersections.

Commenter	Comment #	Comment Type	Name
L 5	L5.193	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA	Appendix L	Fairfax County - multiagency letter & attachments	

Comment			
In Appendix L, Submitted Comments, we commented that “A statement should be included in the EIS that would require all Section 106 archeological work (scopes of work and reports) be coordinated with the Fairfax County Park Authority. It is a requirement under Section 106 that consultation be made with all interested parties, of which the Park Authority is the prime one regarding archeology.” As a certified local government, we are consulting parties in the Section 106 process by-right. This statement was not included in the text of the DEIS.			

Response
Section 4.9.2.3.3 of the EIS states that the Army would consult with interested parties through the Section 106 process. The Section 106 process for BRAC at Fort Belvoir is currently ongoing, and the County has been an active participant.

Commenter	Comment #	Comment Type	Name
L 5	L5.194	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA	1-2	Fairfax County - multiagency letter & attachments	
Comment			
Figure 1-1 (page 1-2) incorrectly identifies the Franconia-Springfield Parkway as an Interstate Highway. This highway is not even limited access over its full course. Other limited access highways (e.g., the Dulles Toll and Access Roads, the George Washington Memorial Parkway, highways near the Pentagon) are also incorrectly identified as Interstate Highways.			
Response			
The figure has been revised as indicated in the comment.			

Commenter	Comment #	Comment Type	Name
L 5	L5.195	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA	2-5	Fairfax County - multiagency letter & attachments	
Comment			
It should be noted that the “Existing Land Use Designations” map (Figure 2-1 on page 2-5) incorrectly identifies much of the “Environmentally Sensitive” areas as being located in the “Administration and Education” land use category. Substantial areas within the eastern portion of the South Post area are, in fact, designated as “Environmentally Sensitive.”			
Figure 2-5 identifies “Training Ranges” as the “Existing Land Use Designation” for the EPG site in the current land use plan. Since the EPG site is not included in the Real Property Master Plan (as noted on page 2-3), this designation is inappropriate.			
Response			
The figure referenced in the second half of the comment appears to reference the wrong figure - it should be Figure 2-1, the same figure referenced earlier in the comment. The figure has been revised accordingly per both halves of the comment.			

Commenter	Comment #	Comment Type	Name
L 5	L5.196	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA	3-3	Fairfax County - multiagency letter & attachments	
Comment			
Page 3-3 indicates that the GSA site is 65 acres in size, while page 4-2 cites a figure of 70 acres. The discrepancy should be corrected.			
Response			
The GSA site is approximately 69.5 acres. Text throughout the EIS has been changed to reflect 70 acres.			

Commenter	Comment #	Comment Type	Name
L 5	L5.197	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA		Fairfax County - multiagency letter & attachments	
Comment			
There is an inconsistency between the text on page 3-3 and Figure 3-1 on page 3-4. There is a similar inconsistency between the text on page 3-11 and Figure 3-5 on page 3-10. The text indicates that, under the Town Center (or Satellite Campuses) alternative, the western half of EPG would be designated for a “Community” use. Figure 3-1 (and Figure 3-5) shows the entirety of the EPG property as being “Professional/Institutional.”			
Response			
In both instances, the text is incorrect. Under the Town Center and Satellites Campuses Alternatives, areas west of Accotink Creek would be designated for Professional/Institutional uses. The text in Section 3 has been corrected.			

Commenter	Comment #	Comment Type	Name
L 5	L5.198	Local Agency	Gerald Connolly
Section	Page Number	Organization	
DOPAA		Fairfax County - multiagency letter & attachments	
Comment			
A statement on page 4-1 indicates that “the footprints used for the major BRAC projects were shown in Figure 2-6.” Figure 2-6 does not provide footprints of facilities. Rather, it is a small-scale dot map identifying the proposed general locations for projects.			
Response			
Text in Section 4.1 has been added to reference Appendix J, which contains project footprints.			

Commenter	Comment #	Comment Type	Name
L 5	L5.199	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use	4-10	Fairfax County - multi agency letter & attachments	
Comment			
The discussion of the Policy Plan on page 4-10 misses the Economic Development and Revitalization sections. There are ten functional elements, not eight.			
Response			
The discussion on the Policy Plan in the text has been revised to show the 10 functional elements.			

Commenter	Comment #	Comment Type	Name
L 5	L5.200	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use		Fairfax County - multiagency letter & attachments	
Comment			
Pages 4-11 and 4-12 confuse two community planning sectors with similar names. On page 4-11, Planning Sector S5 is identified as the “Fort Belvoir Community Planning Sector.” This is actually the “Belvoir Community Planning Sector,” not to be confused with Planning Sector LP4 (the Fort Belvoir Community Planning Sector). On page 4-12, the boundaries of the Fort Belvoir Community Planning Sector are described incorrectly. The sector is located in the Lower Potomac Planning District and is comprised almost entirely of the Main Post of Fort Belvoir, along with the Village of Accotink and a 107-acre area in the northeastern quadrant of the intersection of Richmond Highway and Telegraph Road. The similarly named “Belvoir Community Planning Sector” is located in the Springfield Planning District; this Planning Sector includes the EPG site and all areas south of EPG between Rolling Road and I-95. EPG is also located within the Franconia-Springfield Area portion of the Area IV Plan; detailed Plan recommendations for EPG can be found in that portion of the Plan.			
Response			
Text has been edited according to the comment.			

Commenter	Comment #	Comment Type	Name
L 5	L5.201	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use	4-12	Fairfax County - multiagency letter & attachments	
Comment			
Text in the first paragraph on page 4-12 refers to what the “county wishes to see.” This should be revised to correctly reference the Comprehensive Plan guidance			
Response			
The text has been updated to better reflect Comprehensive Plan guidance.			

Commenter	Comment #	Comment Type	Name
L 5	L5.202	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use	4-12	Fairfax County - multiagency letter & attachments	
Comment			
The Comprehensive Plan guidance for Laurel Hill (found in the LP1 - Laurel Hill Community Planning Sector) has been amended, so more specific description could be incorporated on page 4-12.			
Response			
Analysis was made with the most up-to-date information available at the time. Further updates will not affect prediction of effects.			

Commenter	Comment #	Comment Type	Name
L 5	L5.203	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use	4-13	Fairfax County - multiagency letter & attachments	
Comment			
The identification of a “conservation” zoning category in Figure 4.2-3 (page 4-13) is somewhat awkward, in that there is no separate zoning category dedicated to conservation (the Residential-Conservation District allows residential development at a maximum density of one dwelling unit per five acres). Areas of Laurel Hill have been protected through the zoning process, but there are similar areas elsewhere on the map that have been similarly protected (e.g., a large EQC area in Island Creek). Also, the “Residential” vs. “Planned Housing” designations are confusing—the map seems to be trying to draw a distinction between conventional R districts and P districts (and there is a similar issue for “Commercial” and “Planned Commercial”) but it suggests a difference in use that is not evident.			
Response			
The figure was simplified for the purposes of the EIS based on zoning categories provided by Fairfax County.			

Commenter	Comment #	Comment Type	Name
L 5	L5.204	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use	4-14	Fairfax County - multiagency letter & attachments	
Comment			
Page 4-14 of the DEIS states that “Kingstowne is expected to burgeon over the next 4 years.” While the Town Center development is not complete, much of Kingstowne has already been constructed, including the residential component. It is not clear how much “burgeoning” is left to occur.			
Response			
The text has been edited to clarify the actual situation with Kingstowne.			

Commenter	Comment #	Comment Type	Name
L 5	L5.205	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use	4-15	Fairfax County - multiagency letter & attachments	
Comment			
Page 4-15 states: “Much of the formal Lorton correctional facility area is zoned PDH as well.” While portions of Laurel Hill have PDH zoning, most of this land is zoned R-C.			
Response			
The text has been updated according to the comment.			

Commenter	Comment #	Comment Type	Name
L 5	L5.206	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use	4-15	Fairfax County - multiagency letter & attachments	
Comment			
The reference to “Kingstowne Center” on page 4-15 seems to be referencing both the Kingstowne development as a whole (6,300 residential units) and the Town Center component of it (four buildings). Clarification should be provided.			
Response			
The text has been modified to clarify the different building projects.			

Commenter	Comment #	Comment Type	Name
L 5	L5.207	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use	4-16	Fairfax County - multiagency letter & attachments	
Comment			
On page 4-16, the third bullet point under the objectives for the Lower Potomac Planning District is awkward—the Plan text in question reads: “Encourage the creation of additional parks, open space and recreation areas and acquisition of additional acreage in environmentally sensitive areas as part of the Environmental Quality Corridor program.”			
Response			
The text has been edited for clarity.			

Commenter	Comment #	Comment Type	Name
L 5	L5.208	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use		Fairfax County - multiagency letter & attachments	
Comment			
In the Area Plans Review process, eight amendments (affecting 82 acres) to the Comprehensive Plan were adopted within the study area. The 372 acre figure presented on page 4-16 is incorrect.			
Response			
The number has been corrected in the text to 82 acres.			

Commenter	Comment #	Comment Type	Name
L 5	L5.209	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use		Fairfax County - multiagency letter & attachments	
Comment			
Would some of the projects described in the sentence that straddles pages 4-16 and 4-17 require site plan approval in addition to building permit approval?			
Response			
The matter raised in the comment exceeds the scope of the EIS as determined by the Army. Analysis on cumulative effects looks at the overall effect of developments occurring at the same time as planned BRAC actions and not their inherent permitting details.			

Commenter	Comment #	Comment Type	Name
L 5	L5.210	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use	4-19	Fairfax County - multiagency letter & attachments	
Comment			
Page 4-19 states that the preferred alternative would increase total development from nearly 11 million square feet of space to approximately 16 million square feet (plus 7 million more square feet of parking). However, the DEIS notes that there will be approximately 7 million square feet of new and renovated facilities for the BRAC actions. Are 2 million square feet of BRAC actions going to be located in space vacated by departing uses? If not, why would the future development area be only 16 million square feet instead of 18 million square feet?			
Response			
Section 2.2.2.3 states that there would be 6.2 million square feet of additional built space, which includes redeveloped areas. Of this, 1.2 million square feet are for BRAC actions that were vacated by departing uses. These include existing buildings including the troop barracks, AMC relocatables, Buildings 211, 214, 215, 220, and others.			

Commenter	Comment #	Comment Type	Name
L 5	L5.211	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use	4-21	Fairfax County - multiagency letter & attachments	
Comment			
The fourth paragraph in Section 4.2.3.2 on page 4-21 should reference the Town Center alternative rather than the preferred alternative.			
Response			
The text has been edited according to the comment.			

Commenter	Comment #	Comment Type	Name
L 5	L5.212	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.2 Land Use	4-27	Fairfax County - multiagency letter & attachments	
Comment			
Table 4.2-6 on page 4-27 provides acreage information for both “residential” and “troop” land use designations for each alternative. The term “residential” implies that all housing would be located in these areas, although it is clear that this is not the intent, because troop housing would not be a subset of “residential.” “Family housing” would seem to be a better/clearer description if not all residential uses will fall within this category.			
Response			
The land use category names are intended to convey the general use of the land within them. A more detailed description of the categories is provided in Section 2.2.1.2.			

Commenter	Comment #	Comment Type	Name
L 5	L5.213	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation	4-52	Fairfax County - multiagency letter & attachments	
Comment			
On page 4-52, the first full paragraph is duplicated			
Response			
The second paragraph was deleted accordingly.			

Commenter	Comment #	Comment Type	Name
L 5	L5.214	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.3 Transportation		Fairfax County - multiagency letter & attachments	
Comment			
In Table 4.3-8, the Fairfax County Parkway should be on the CLRP as 6 lanes through the EPG (Rolling Road to Fullerton/I-95 Newington interchange). The recently published CLRP brochure from COG does not show this project, however it is on the listing of conformity projects.			
Response			
This was an omission, and Table 4.3-8 has been updated to include this information.			

Commenter	Comment #	Comment Type	Name
L 5	L5.215	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.5 Noise		Fairfax County - multiagency letter & attachments	
Comment			
Pages 4-167 and 4-168 discuss aircraft noise. For clarification, it should be recognized that Fairfax County’s Comprehensive Plan applies a 60 dB ADNL threshold—the Plan recommends against new residential zoning where projected noise levels will exceed this threshold.			
Response			
Thank you for your comment. Because there are no changes in aircraft operations associated with the action, the information represents a level of detail unnecessary to adequately understand relevant issues.			

Commenter	Comment #	Comment Type	Name
L 5	L5.216	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.7 Water Resources	4-210	Fairfax County - multiagency letter & attachments	
Comment			
Page 4-210 indicates that county water quality monitoring station locations are identified on Figure 4.7-3; these stations aren’t identified on that figure.			
Response			
Stations were added to the figure within the map's extent; text was added for stations outside the map extent.			

Commenter	Comment #	Comment Type	Name
L 5	L5.217	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.7 Water Resources	4-217	Fairfax County - multiagency letter & attachments	
Comment			
Page 4-217 states: “The threshold where indicators of stream quality shift toward degraded water quality is around 25 to 30 percent impervious cover.” It is our view that this threshold is a much lower amount of impervious cover--the county’s 2001 Stream Protection Strategy Baseline Study states: “At levels of 10-20% imperviousness, stream quality becomes adversely impacted (Klein, 1979, Booth, 1991, Schueler et al., 1992, Booth et al., 1993, Booth and Jackson, 1994 and Boward et al., 1999).”			
Response			
The text was revised accordingly.			

Commenter	Comment #	Comment Type	Name
L 5	L5.218	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.7 Water Resources	4-217	Fairfax County - multiagency letter & attachments	
Comment			
The reference to Figure 4.7-1 near the bottom of page 4-217 should probably be Figure 4.7-2			
Response			
Changed the reference to Figure 4.7-2			

Commenter	Comment #	Comment Type	Name
L 5	L5.219	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.7 Water Resources	4-232	Fairfax County - multiagency letter & attachments	
Comment			
Page 4-232 states: "Under current National Flood Insurance Program and Fairfax County zoning limitations, no permanent dwellings are permitted to be constructed within the 100-year floodplain boundary, although roadways, athletic fields and similar facilities are generally permitted (USACE, 2003). This statement should be clarified, as Fairfax County's Comprehensive Plan does not support active recreational uses in floodplains (floodplains are components of the stream valley core of the EQC system). The Zoning Ordinance significantly limits uses within floodplains, including active recreational uses. County staff is available to provide project consultants with further guidance regarding the county's Floodplain Regulations.			
Response			
The text was revised accordingly.			

Commenter	Comment #	Comment Type	Name
L 5	L5.220	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.7 Water Resources	4-256	Fairfax County - multiagency letter & attachments	
Comment			
RPA impacts presented in Table 4.7-27 (page 4-256) are in conflict with the data presented in Table 4.8-11 (page 4-281). What are the actual impacts? They should be presented consistently among sections of the report.			
Response			
See response to Comment #L5.100. Tables 4.7-27 and 4.8-11 have been made consistent. Appendix J has been added to the EIS showing proposed project location maps as well as approximate acreages, based on best available information, of impacts on water resources (Table J-2).			

Commenter	Comment #	Comment Type	Name
L 5	L5.221	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.8 Biological Resources	4-257	Fairfax County - multiagency letter & attachments	
Comment			
The discussion of the EQC policy on page 4-257 is not presented accurately. The bulleted items are part of the stream valley EQC core and not in addition to it, and other non-stream valley areas augment the stream valley core based on ecological value.			
Response			
The EQC policy recommends protection and restoration of environmentally sensitive lands, including 100-year floodplains, steep slopes (gradients of 15 percent or greater) in stream valleys, wetlands connected to the stream valleys, minimum buffer areas, and upland habitats that augment the habitats and buffers provided by stream valleys (Fairfax County, 2003).			

Commenter	Comment #	Comment Type	Name
L 5	L5.222	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.8 Biological Resources	4-258	Fairfax County - multiagency letter & attachments	
Comment			
Figure 4.8-1 (page 4-258) identifies an EQC only on the EPG site, suggesting that there are no EQCs on the Main Post. Quite clearly, there are extensive EQCs on the Main Post—they simply haven't been mapped as they have on EPG. There should be some sort of acknowledgement of this in the EIS.			
Response			
Although EQC areas on the Main Post were not available to provide on a map, environmentally sensitive areas on the Main Post meet or exceed EQC designations. These areas have been in place since the 1980s, and are protected by regulations currently in place (i.e. RPAs, wetlands).			

Commenter	Comment #	Comment Type	Name
L 5	L5.223	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.8 Biological Resources	4-258	Fairfax County - multiagency letter & attachments	
Comment			
Figure 4.8-1 on page 4-258 is titled "Sensitive Environmental Areas," yet it displays only a subset of sensitive environmental areas that exist on the post. For example, Resource Protection Areas are not shown. This figure should be provided with a more accurate title.			
Response			
RPAs are shown on Figure 4.7-1. The title has been changed to "Sensitive Habitat."			

Commenter	Comment #	Comment Type	Name
L 5	L5.224	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.8 Biological Resources	4-258	Fairfax County - multiagency letter & attachments	
Comment			
The distinction between the "Wildlife Refuge Area" and "Wildlife Management Area" designations on Figure 4.8-1 (page 4-258) are not clear, particularly in light of the patchwork nature of these areas as shown on the map and in light of the labeling that clearly indicates that some "wildlife management areas" (and other areas, for that matter) are located in wildlife refuges. Clarity is needed.			
Response			
"Area" has been dropped from "Wildlife Refuge" in the legend on the figure. The layering of the resources in the figure has been reordered to show wildlife refuges on top, although there is some overlap between them and wildlife management areas. Appendix J of the EIS and Section 4.8 provide distinction between the two wildlife areas.			

Commenter	Comment #	Comment Type	Name
L 5	L5.225	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.8 Biological Resources	4-259	Fairfax County - multiagency letter & attachments	
Comment			
The Paciulli Simmons vegetative survey of EPG should be identified as one of the sources for Table 4.8-1 on page 4-259.			
Response			
A reference to the study was added to the sources listed for the table.			

Commenter	Comment #	Comment Type	Name
L 5	L5.226	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.8 Biological Resources	4-268	Fairfax County - multiagency letter & attachments	
Comment			
There is an omission from one of the headings in Table 4.8-3 (page 4-268). The middle column of the table should be headed "1993 Environmentally Sensitive Land Use."			
Response			
The column heading was corrected.			

Commenter	Comment #	Comment Type	Name
L 5	L5.227	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.8 Biological Resources	4-270	Fairfax County - multiagency letter & attachments	
Comment			
Page 4-270 refers to "losses of habitat on the eastern half of the EPG and the southern extent of the South Post." The latter reference is in error, as no development is being proposed along the "southern extent" of the South Post; much of the development identified in Figure 2-7 would occur in the northern portion of the South Post. Was the intent to reference the southern portion of the proposed development area for the hospital?			
Response			
The reference to the "southern extent" of the South Post was corrected.			

Commenter	Comment #	Comment Type	Name
L 5	L5.228	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.8 Biological Resources	4-270	Fairfax County - multiagency letter & attachments	
Comment			
Page 4-270 states: "No effects on sensitive or protected species from a change in land use designation would occur on EPG because all areas of EPG are available for some type of development under both the 1993 land use plan and the Preferred Alternative land use plan." The 1993 Real Property Master Plan did not cover the EPG site, and therefore this statement is inaccurate. Further, the Fairfax County Comprehensive Plan identifies the preservation of the Accotink Stream Valley EQC and other environmentally-sensitive areas as major planning objectives for the EPG site, so it is clear that large areas of the EPG property have not been considered by county policy to be "available for some type of development." The proposed land use designations as applied to EPG would be in conflict with the county's Comprehensive Plan.			
Response			
The EIS text referenced in the comment was edited accordingly to remove reference to the inclusion of EPG in the 1993 land use plan. See response to Comment L3.4 regarding retaining environmental protections for the EQC although it is not identified in the land use plan itself.			

Commenter	Comment #	Comment Type	Name
L 5	L5.229	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources		Fairfax County - multiagency letter & attachments	
Comment			
On page 4-283 in the second paragraph, "During the War of 1812, it was devastated again by British forces" should read "During the Battle of the White House in the War of 1812, the White House, another Fairfax family property, and the remains of Belvoir were shelled by British forces."			
Response			
The text has been modified as requested.			

Commenter	Comment #	Comment Type	Name
L 5	L5.230	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources		Fairfax County - multiagency letter & attachments	
Comment			
On page 4-283 in the third paragraph: "The Society of Friends, or Quakers, was among these" should read "Members of the Society of Friends, or Quakers, were among these."			
Response			
The text has been modified as requested.			

Commenter	Comment #	Comment Type	Name
L 5	L5.231	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources		Fairfax County - multiagency letter & attachments	
Comment			
In the legend for Figure 4.9-1 on page 4-291, we suggest changing the wording from "Local Landmark" to "Local Historic Site."			
Response			
The legend has been changed as suggested.			

Commenter	Comment #	Comment Type	Name
L 5	L5.232	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources		Fairfax County - multiagency letter & attachments	
Comment			
Figure 4.9-1 (page 4-291) has several errors. Shiloh Baptist Church is not in the location shown; this is Lebanon. Shiloh is further southeast. The Taft Archaeological site, which is a National Register listed site located in Mason Neck State Park, may be within the region of influence and should be on the map. George Washington's Grist Mill is labeled as National Register-eligible; it is actually listed on the National Register. The WWI warehouses should be added to Ft. Belvoir.			
Response			
The text and figure have been modified to address suggested changes for Shiloh Baptist Church and George Washington Grist Mill. Taft Archaeological Site is not within the APE. The WWI warehouses are part of the Fort Belvoir Historic District.			

Commenter	Comment #	Comment Type	Name
L 5	L5.233	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources		Fairfax County - multiagency letter & attachments	
Comment			
On page 4-292 and in other places throughout the document, reference is made to "Historic District Overlays." This reference should be changed to "Historic Overlay Districts."			
Response			
The text has been modified as requested.			

Commenter	Comment #	Comment Type	Name
L 5	L5.234	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources		Fairfax County - multiagency letter & attachments	
Comment			
On page 4-292, in the last line of paragraph 3, insert the word "historic" between the words "or" and "overlay."			
Response			
The text has been modified as requested.			

Commenter	Comment #	Comment Type	Name
L 5	L5.235	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources		Fairfax County - multiagency letter & attachments	
Comment			
On page 4-294, in the second heading on the page, insert the word "historic" so it reads: "Woodlawn historic district and historic overlay district."			
Response			
The text has been modified as requested.			

Commenter	Comment #	Comment Type	Name
L 5	L5.236	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources		Fairfax County - multiagency letter & attachments	
Comment			
On page 4-294, in the "Designation status" for Grandview (Jacob Troth House), please add: Contributes to Fairfax County Woodlawn Historic Overlay District.			
Response			
The text has been modified as requested.			

Commenter	Comment #	Comment Type	Name
L 5	L5.237	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources		Fairfax County - multiagency letter & attachments	
Comment			
The Otis Tufton Mason House is placed in the incorrect section of Table 4.9-3 (page 4-295). It should be in the section under the heading "Woodlawn Historic District and Historic Overlay District." The "designation status" summary for this site should add: "Contributes to Fairfax County Woodlawn Historic Overlay District."			
Response			
The text has been modified as requested.			

Commenter	Comment #	Comment Type	Name
L 5	L5.238	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources		Fairfax County - multiagency letter & attachments	
Comment			
On page 4-299, in the discussion of the Southwest Area, the DEIS states: "While training use of the areas could result in adverse effects on these sites, the Training designation would prevent development in these areas. Both of these would be beneficial effects." This is incorrect. Adverse effects are not beneficial. We suggest deleting or revising the sentence "Both of these would be beneficial effects."			
Response			
"Both" refers to the reduction in potential for visual effects on architecture and the reduction in physical effects on archaeology from development. The text has been modified to clear this misunderstanding.			

Commenter	Comment #	Comment Type	Name
L 5	L5.239	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources		Fairfax County - multiagency letter & attachments	
Comment			
On page 4-300, the DEIS states: "Long-term minor adverse effects could occur to historic properties as a result of some of the 20 proposed projects under the Preferred Alternative." We find the statement misleading and object to the adjective "minor."			
Response			
This is a summary statement, which is followed by the detailed analysis. No change was made to the text.			

Commenter	Comment #	Comment Type	Name
L 5	L5.240	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.9 Cultural Resources		Fairfax County - multiagency letter & attachments	
Comment			
On page 4-318, the Woodlawn Historic Overlay District should be included as a Cultural Resource within Table 4.9-11.			
Response			
Table 4.9-11 addresses only the individual BRAC projects, analysis of which did not find potential adverse effects to the Woodlawn Historic Overlay District. Potential effects on the overlay district were found for the land use plan alternatives, but Table 4.9-10 presents the impacts from the land use plan alternatives differently. Whereas Table 4.9-11 shows each impact, Table 4.9-10 is a comparison of the extent of effects between the Preferred Alternative and the particular alternative assigned to that column. This format makes comparison of effects between the alternatives easy for the reader. No change was made to the text.			

Commenter	Comment #	Comment Type	Name
L 5	L5.241	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.10 Socioeconomics		Fairfax County - multiagency letter & attachments	
Comment			
Table 4.10-7 on page 4-330 identifies minority and low income population figures for census tracts/block groups in the area. Census tract-block group 4316-2 is located within the EPG site (as shown on Figure 4.10-1 on page 4-331). There are no residences on the EPG property. Why, then, are data for minority and low income populations identified?			
Response			
Census tract-block 4316-2 was incorrectly identified on Figure 4.10-1. The location of the tract was compared to the U.S. Census Bureau map, and Figure 4.10-1 has been corrected.			

Commenter	Comment #	Comment Type	Name
L 5	L5.242	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.10 Socioeconomics		Fairfax County - multiagency letter & attachments	
Comment			
The population increase data presented in Table 4.10-12 on page 4-340 should be presented in terms of real numbers in addition to percentage change.			
Response			
Table 4.10-12 has been revised to include real numbers in addition to percentage change.			

Commenter	Comment #	Comment Type	Name
L 5	L5.243	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.10 Socioeconomics		Fairfax County - multiagency letter & attachments	
Comment			
Page 4-359 states that the proposed land use plan change associated with the Satellite Campuses alternative would “reduce the number of acres designated as Outdoor Recreation.” The land use plan change would actually eliminate this category altogether and not just reduce acreage.			
Response			
The "Recreation" land use category became part of the "Community" land use category. The Satellite Campus Alternative would reduce the number of recreational areas but would not eliminate recreational areas.			

Commenter	Comment #	Comment Type	Name
L 5	L5.244	Local Agency	Gerald Connolly
Section	Page Number	Organization	
Other		Fairfax County - multiagency letter & attachments	
Comment			
Page 4-386 (and other pages as well) incorrectly identifies the Noman M. Cole, Jr. Pollution Control Plant as the “Norman” M. Cole Pollution Control Plant.			
Response			
The text was revised as requested.			

Commenter	Comment #	Comment Type	Name
L 5	L5.245	Local Agency	Gerald Connolly
Section	Page Number	Organization	
4.13 Hazardous Waste		Fairfax County - multiagency letter & attachments	
Comment			
Page 4-434 indicates that there are four hazardous waste management units within the proposed development areas of the EPG site, yet no such units are identified on the EPG site within Figure 4.13-1.			
Response			
The Figure was revised as suggested.			

Commenter	Comment #	Comment Type	Name
L 5	L5.246	Local Agency	Gerald Connolly
Section	Page Number	Organization	
5 Cumulative Impacts		Fairfax County - multiagency letter & attachments	
Comment			
Many of the projects listed in Table 5-2 are located incorrectly in Figure 5-2, including 29, 59, 143, 150, 151, 152, 153, and 185.			
Response			
The locations of the off-post cumulative projects were mapped using Tax IDs provided by the county. This data source provides only a general location for the project, which was adequate for the type of analysis needed for these cumulative projects.			

Commenter	Comment #	Comment Type	Name
L 5	L5.247	Local Agency	Gerald Connolly
Section	Page Number	Organization	
5 Cumulative Impacts		Fairfax County - multiagency letter & attachments	
Comment			
Page 5-13 states that “there exists a considerable amount of undeveloped acreage in the planned community” of Kingstowne. This is not correct. Much of the undeveloped acreage in the approximately 1,000 acre Kingstowne development contains open space areas that have been protected through agreements reached during the zoning process. The residential component of Kingstowne is largely built-out, and there should not be an implication that large areas of Kingstowne remain to be developed. However, there are existing zoning approvals for approximately 500,000 square feet of unbuilt office space in the approximately 175 acre Kingstowne Towne Center and the developer is seeking zoning approval to increase that to 1.2 million square feet in four buildings.			
Response			
The text has been edited to make it more clear that there is little land left to be built-out in Kingstowne.			

Commenter	Comment #	Comment Type	Name
L 5	L5.248	Local Agency	Gerald Connolly
Section	Page Number	Organization	
5 Cumulative Impacts		Fairfax County - multiagency letter & attachments	
Comment			
On page 5-13, the reference to a “future transit station area” at I-95 and South Van Dorn Street is confusing. This is the Van Dorn Transit Station Area, which is planned for high-density office, hotel and residential use.			
Response			
The reference has been removed for clarity.			

Commenter	Comment #	Comment Type	Name
L 5	L5.249	Local Agency	Gerald Connolly
Section	Page Number	Organization	
5 Cumulative Impacts		Fairfax County - multiagency letter & attachments	
Comment			
Page 5-13 categorizes the Springfield District contribution to cumulative land use impacts as negligible. Does this account for the proposed re-development of the Springfield Mall and the Midtown Springfield project? These would add approximately 2,800 residential units and 3.5 million square feet of office, hotel and retail development to the district.			
Response			
The text was changed to minor. The effect would not be more because of the level of development already in this area, and the siting along existing road corridors.			

Commenter	Comment #	Comment Type	Name
L 5	L5.250	Local Agency	Gerald Connolly
Section	Page Number	Organization	
Other		Fairfax County - multi agency letter & attachments	
Comment			
Please include the following references in Section 8.0: Federal Highway Administration, Potomac Heritage National Scenic Trail Alignment Study: Fairfax County, Virginia: Final Report, (Sterling, Vir.: Federal Highways Administration Eastern Lands Highway Division, 2004) Metropolitan Washington Council of Governments, Priorities 2000: Metropolitan Washington Greenways (Washington, D.C.: National Capital Region Transportation Planning Board, MWCOG, 2001) Northern Virginia Regional Commission, Implementation Plan for the Potomac Heritage National Scenic Trail in Fairfax County (Annandale, Vir.: Northern Virginia Regional Commission, 2002)			
Response			
The references were not identified as a source anywhere in the comments from Fairfax County. References were not added.			

Commenter	Comment #	Comment Type	Name
L 6	L6.1	Local Agency	Jack D. Dale
Section	Page Number	Organization	
4.10 Socioeconomics		Fairfax County Public Schools	
Comment			
<p>On behalf of Fairfax County Public Schools (FCPS) and members of the Fairfax County School Board, thank you for the opportunity to comment on the impending Base Realignment and Closures (BRAC) action that will impact Fort Belvoir and the surrounding areas of Fairfax County. Although FCPS participated in the Draft Environmental Statement (DEIS) review process and incorporated our concerns in a letter from the Fairfax County Executive, Anthony H. Griffin, along with many other Fairfax County agencies, the magnitude of potential impact on school facilities warrants additional comments to highlight our concerns in the context of planning and budgeting for an influx of more than 3,000 students in a short time frame.</p> <p>Section 4, Table 4.10-13 of the DEIS indicates that a total redistribution of 4,340 children could be anticipated, primarily in southern Fairfax County, of which 3,258 are projected to be school-aged children. The DEIS specifically states that "these estimated population increases from the BRAC action translate into minor population increases over the current population projections" and that school districts "are already planning on how to accommodate the projected 2010 population."</p> <p>There are four high school pyramids that could potentially be impacted within the identified Region of Influence (ROI): Hayfield, Lee, South County, and Mount Vernon. The adopted 2008-2012 Capital Improvement Program (CIP) that provides capacity projections for the 2011-12 school year indicates that, for these four school pyramids, there will be a cumulative capacity deficit of 1,381 spaces at the elementary school level and a capacity surplus of 1,022 and 104 spaces at the high and middle school levels respectively. The CIP projections do not include the impact of 22,000 new employees relocating to Fort Belvoir and the Army's projected impact of more than 3,000 school-aged children within Fairfax County. We do not agree with the DEIS statement that the anticipated increases in student population is minor, especially when the largest proportion will be elementary students where a significant capacity deficit is currently projected at the elementary school level in southern Fairfax County.</p> <p>With the 2008-2012 CIP, the annual funding limit imposed by the Board of Supervisors was increased from \$130 million to \$155 million which allows FCPS to meet funding schedules for new construction and renovation and maintain and operate 184 general education and 26 special education facilities. The current CIP includes \$2 million in funds specifically designated for BRAC planning. Based on the school-aged population projections provided in the DEIS and assuming that all would attend public school, FCPS is expected to absorb an influx of 3,258 new students. This influx would require the equivalent capacity of 1.95 elementary school building, 0.4 middle school building, and 0.4 high school building. Adjusting this need against the existing capacity available in the ROI eliminates the high school need and reduces the middle school need to 0.32 new middle school building. The need for 1.95 elementary school buildings remains and exacerbates the substantial existing elementary school capacity deficit projected for elementary schools in southern Fairfax County.</p> <p>The adjusted facility cost of 0.32 additional middle and 1.95 elementary school facilities, after using all available capacity, is \$77.1 million. Given that the potential influx of more than 3,000 school-aged children as reported in the DEIS was only recently made public, the current facilities planning and CIP budget do not provide for the additional capacity required to accommodate the impact of BRAC.</p> <p>On the matter of addressing school impacts, the DEIS concludes that:</p> <p>"The Army would continue to confer with the potentially affected school districts on potential student increases that could occur under the preferred alternative. Advance notice would give the school time to secure funding, add facilities and hire new teachers, as necessary. Although the local school districts receive additional funding for each military dependent attending public school, school districts would bear some of the costs for additional teachers and physical space, if needed."</p> <p>The DEIS conclusion and reference to \$7 million to be dispensed to the Department of Defense for the most heavily impacted school districts falls far short of school facilities requirements that are likely to be generated by BRAC. Now that the Army has provided a projection for potential new school-aged children and the adjusted capacity requirements and costs have been identified, I hope that we can pursue additional discussions regarding the proportional share that the Army would be expected to bear as a result of BRAC action. In addition, the Record of Decision should identify the funding source and timely schedule of payments to address the projected influx of new students anticipated with BRAC action which I understand must be completed by September 15, 2011.</p>			
Response			
The revised/updated EIS Section 4.10.2.2.2 reflects the estimated student population in the NCR.			

Commenter	Comment #	Comment Type	Name
L 7	L7.1	Local Agency	John A. Magarelli
Section	Page Number	Organization	
4.3 Transportation		WMATA	
Comment			
As conceptual plans, WMATA concurs with the basic bus service proposals and preliminary costs as presented for Route 1 Fairfax County, western Fairfax County, and for a Franconia-Springfield shuttle service to the Main Post and EPG site. We would also encourage DoD to provide the intra-base circulator services proposed with timed transfers at strategic locations on base, or at a transit center, to connect with regional operator's services.			
Response			
The Record of Decision will indicate whether transit services will be adopted. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.			

Commenter	Comment #	Comment Type	Name
L 7	L7.2	Local Agency	John A. Magarelli
Section	Page Number	Organization	
4.3 Transportation		WMATA	
Comment			
The transit service plans for the different land use alternatives call for additional peak hour bus service serving Franconia-Springfield and Huntington Metro Stations and a shuttle service from F-S Station to/from the Main Post and EPG site. A shuttle service will not adequately take advantage of access to Metrorail at Franconia-Springfield Station. Significantly more capacity and reduced travel times will be needed to maximize transit mode share. Some capital investment will be necessary to improve facilities and service.			
Response			
The Record of Decision will indicate whether transit services will be adopted. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work to improve transit services.			

Commenter	Comment #	Comment Type	Name
L 7	L7.3	Local Agency	John A. Magarelli
Section	Page Number	Organization	
4.3 Transportation		WMATA	
Comment			
WMATA will have to further analyze the operational impacts of running additional bus service to each of these stations and determine the future bus bay capacity, along with the physical constraints, in conjunction with our own future needs. Please note that at Franconia-Springfield Station there is no excess capacity for future bus services unless additional bus bays are constructed. At Huntington Station, two bus bays are available only on the south (Kings Highway) side to accommodate future service expansion.			
Response			
The Record of Decision will indicate whether transit services will be adopted. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work to improve transit services.			

Commenter	Comment #	Comment Type	Name
L 8	L8.1	Other Organization	John Pellegrin
Section	Page Number	Organization	
4.3 Transportation		The South County Project Steering Committee	
Comment			
The regional transportation debate has been at the forefront of most conversations in Northern Virginia and has a place of its own among the dialog surrounding this installation of BRAC. Fort Belvoir will experience a net gain of approximately 22,000 people which will have a great impact on the county's already fragile transportation infrastructure. It is imperative that the transportation improvements identified in the DEIS including improvements to the Fairfax County Parkway; access and egress to and from I-95 and the HOV/HOT lanes to the EPG and the main base; and improvements to the Richmond Highway corridor be the first priority for funding and construction. It is our view that the federal government should shoulder an appropriate burden in that regard.			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. Funding of transportation projects will also be addressed in the ROD.			

Commenter	Comment #	Comment Type	Name
L 8	L8.2	Other Organization	John Pellegrin
Section	Page Number	Organization	
4.3 Transportation		The South County Project Steering Committee	
Comment			
Additional emphasis must be placed on connecting the main base and the EPG to the region's mass transit network. The concentration of employment centers in compact areas -- such as is recommended for EPG -- provides the opportunity through shuttles and targeted improvements such as light rail or BRT to play a role in offering the new workforce alternatives to the automobile. Any amendments to the plan that would enhance connectivity to the Springfield Metro and VRE hub should also be considered and supported.			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. Funding of transportation projects will also be addressed in the ROD.			

Commenter	Comment #	Comment Type	Name
L 8	L8.3	Other Organization	John Pellegrin
Section	Page Number	Organization	
4.10 Socioeconomics		The South County Project Steering Committee	
Comment			
In addition to the economic impact BRAC will bring to South County it is also important to recognize the other positive benefits forthcoming. The locating of the National Museum of the Army is one such benefit. The museum will add to the rich cluster of tourism destinations in the area and will make South County an even more attractive destination for visitors. The South County Project supports its location off the Parkway and Kingman Road as an appropriate location that balances accessibility with desirability. Likewise, the expansion of DeWitt Hospital will provide more medical care options for the many retired military that already live in proximity to Ft. Belvoir.			
Response			
Comment noted. Thank you for your interest and support. Information on matters raised in the comment is in Section 5.10 and 4.10.2.2.2 subsection "Police, Fire, Medical."			

Commenter	Comment #	Comment Type	Name
L 8	L8.4	Other Organization	John Pellegrin
Section	Page Number	Organization	
4.10 Socioeconomics		The South County Project Steering Committee	
Comment			
Fairfax County as a whole has been extraordinarily smart and fortunate in its growth thus far. As we have grown from rural farm land to a prosperous suburb -- from a bedroom community to the economic center of the region and the economic engine of the state -- Fairfax County residents have reaped rewards of the foresight of its past leaders. The issues being raised during this public review of the Draft Environmental Impact Statement are extraordinary and must be answered. However, these issues should not cloud the overall importance of this installation for South County's redevelopment and economic vitality.			
The South County Project looks forward to continued dialog with stakeholders and the insurance of a successful welcoming of this great opportunity. I again thank you for your time on this matter and urge you to follow the path of so many other successful communities toward implementing BRAC decisions.			
Response			
Comment noted. Thank you for your interest and support. Your comment will be made part of the administration record of the action.			

Commenter	Comment #	Comment Type	Name
L 9	L9.1	Other Organization	John Pellegrin
Section	Page Number	Organization	
4.3 Transportation		The South County Project Steering Committee	
Comment			
[equivalent to L 8.1] The regional transportation debate has been at the forefront of most conversations in Northern Virginia, and has a place of its own among the dialogue surrounding this installation of BRAC. It will be a net gain of 22,000 people, great impact on the county's already fragile transportation infrastructure. It is imperative that the transportation improvements identified in the DEIS, including improvements to the Fairfax County Parkway; access and egress to, and from I-95 and the HOV, HOT lanes issue, an implementation of them, to both EPG and the main base. Improvements to the Richmond Highway corridor be a first priority for funding and construction. It is our view that the federal government should shoulder an appropriate burden in the regard, not just the county or the state.			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. Funding of transportation projects will also be addressed in the ROD.			

Commenter	Comment #	Comment Type	Name
L 9	L9.2	Other Organization	John Pellegrin
Section	Page Number	Organization	
4.3 Transportation		The South County Project Steering Committee	
Comment			
[equivalent to L8.2] Similarly, additional emphasis must be placed on connecting the main base with EPG to the region's mass transit network. Opportunity to use shuttle targeted improvements such as light rail or BRT to enhance connectivity to the Springfield Metro and VRE hub should also be considered and supported.			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.			

Commenter	Comment #	Comment Type	Name
L 9	L9.3	Other Organization	John Pellegrin
Section	Page Number	Organization	
4.10 Socioeconomics		The South County Project Steering Committee	
Comment			
[like L8.3] In addition to the economic impact BRAC will bring to South County it is also important to recognize the other positive benefits forth coming. Location of the National Museum of the Army, while not specifically part of BRAC, is to be commended and the siting seems to be appropriate, therefore, we support that. Likewise, the expansion of DeWitt Hospital will provide more medical care options for the many retired military who already live in proximity to Ft. Belvoir, particularly to the south of Fort Belvoir.			
Response			
Comment noted. Thank you for your interest and support. Information on matters raised in the comment is in Section 5.10 and 4.10.2.2.2 subsection "Police, Fire, Medical."			

Commenter	Comment #	Comment Type	Name
L 9	L9.4	Other Organization	John Pellegrin
Section	Page Number	Organization	
4.10 Socioeconomics		The South County Project Steering Committee	
Comment			
[like L8.4] Fairfax County as a whole has been extremely smart and fortunate in its growth thus far, as we have grown from a rural farmland to a prosperous suburb, from bedroom community to the economic center of the region, and the economic engine of the state. Fairfax County residents have reaped the rewards of the foresight of its past leaders. The issues being raised during the public review of the draft EIS are extraordinary, must be answered. However, these issues should not cloud the overall importance of the installation for South County redevelopment and economic vitality. The South County Project looks forward to continued dialogue with the stakeholders and the insurance of the successful welcoming to this great opportunity. I again thank you for the opportunity to address these issues on behalf of our communities.			
Response			
Comment noted. Thank you for your interest and support. Your comment will be made part of the administrative record of the action. The Army appreciates the support of The South County Project Steering Committee. The Army is committed to coordinating its efforts with the public, local, and state governmental agencies while fulfilling its multiple national security missions and being part of responsible growth in Northern Virginia and the National Capital Region.			

Commenter	Comment #	Comment Type	Name
L10	L10.1	Local Agency	Rich Baier
Section	Page Number	Organization	
4.3 Transportation	4-137	Alexandria Transportation & Environmental Services	
Comment			
Overall, the city [of Alexandria] is disappointed that the transportation analysis and impact mitigation recommendations do not appear to include specific commitments by the Army or Department of Defense (DOD) to fund and/or implement any off-site mitigation actions. The statement on page 4-137 - Funding mechanisms to pay for improvements needed for the BRAC action would be commensurate within the legal authority of the Army, likely through the Defense Access Road Program does not reflect this commitment nor does it offer assurance that the recommended mitigation actions will be taken.			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD. The appropriate function of an EIS is limited to identifying and describing reasonable mitigations for adverse impacts.			

Commenter	Comment #	Comment Type	Name
L10	L10.2	Local Agency	Rich Baier
Section	Page Number	Organization	
4.3 Transportation		Alexandria Transportation & Environmental Services	
Comment			
2. Located just north of the transportation analysis study area, the city is concerned that the transportation study area is too limited. While acknowledging the study findings that increases in traffic demand fall off to less than 10 per cent within three to five miles from the base, the city also notes that in a congested area such as the Washington, DC region where major travel corridors experience recurring low levels of service, a ten per cent increase in demand may result in a significant increases in delay. While a 10 per cent threshold may be quite appropriate in areas with less recurring congestion, it is believed to be too high for conditions that exist in the DC region.			
Response			
Ten percent was adopted for the purposes of the analysis. VDOT has stated that 10 percent should be used; refer to Comment S4.82.			

Commenter	Comment #	Comment Type	Name
L10	L10.3	Local Agency	Rich Baier
Section	Page Number	Organization	
4.3 Transportation		Alexandria Transportation & Environmental Services	
Comment			
3. The study assumes that 50 per cent of the realigned civilian workers will relocate to housing locations consistent with the existing base population prior to 2011. The study also notes that since most of these employees now live within a one hour commute of the base, the time frame for this shift to occur is 10 to 15 years. The city feels that additional justification of the 50 per cent relocation assumption must be provided as this has the effect of shifting up to 11,000 trips per day from routes approaching the base from the north to routes approaching from the south. This difference may be significant to areas north of the base.			
Response			
The study team worked with VDOT and Fairfax County to determine an appropriate percent shift.			

Commenter	Comment #	Comment Type	Name
L10	L10.4	Local Agency	Rich Baier
Section	Page Number	Organization	
4.3 Transportation	4-87	Alexandria Transportation & Environmental Services	
Comment			
4. Page 4-87 notes that for the preferred alternative, the analysis indicated that even with programmed improvements, the morning and evening periods of congestion would be extended by 30 to 45 minutes. This may significantly impact areas adjacent to primary travel corridors by encouraging greater numbers of commuters seek alternative routes not intended to serve commuter traffic. This potential impact does not appear to be considered in the analyses.			
Response			
The travel demand model accounted for spreading across multiple roadways (bean-bag effect). See Section 4.3.1.3. Trips will be redistributed across other roadways.			

Commenter	Comment #	Comment Type	Name
L10	L10.5	Local Agency	Rich Baier
Section	Page Number	Organization	
4.3 Transportation		Alexandria Transportation & Environmental Services	
Comment			
5. The study projects that only one to two per cent of base employees will use transit to travel to and from the base. In light of the significant changes in base activities, infrastructure and employment, the Army and DOD should take full advantage of its opportunity to develop base land use and transportation management plans that can be reasonably expected to significantly increase this transit mode share, and commit to developing the transit infrastructure and services necessary to support a much higher level of transit use. Statements such as the Army could appoint a Transportation Demand Management Coordinator and a comprehensive TMP program is expected do not reflect the commitment necessary to make these possibilities realities.			
Response			
Adoption of the traffic demand management program and hiring appropriate staff to manage it will be addressed in the Record of Decision, including funding. The appropriate function of an EIS is limited to identifying and describing reasonable mitigations for adverse impacts.			

Commenter	Comment #	Comment Type	Name
L11	L11.1	Local Agency	Pat Thomas
Section	Page Number	Organization	
Other		Prince William County Planning Office	
Comment			
We concur with others that have stated a need to reevaluate the dismissal of the GSA warehouse site as an option for redevelopment. Given its proximity to Metro service and Fairfax County's plans for redevelopment of the Springfield area, location of some of the new facilities/personnel would serve to support the County's goals and take full advantage of transit opportunities and lessen the traffic impact of the BRAC implementation.			
Response			
The GSA site is examined as part of the City Center Alternative. Because the BRAC recommendations direct realignment to Fort Belvoir, and GSA is not part of Fort Belvoir, additional legislation would be needed to allow use of the GSA parcel. A decision on whether it will be used will be announced in the Record of Decision.			

Commenter	Comment #	Comment Type	Name
L11	L11.2	Local Agency	Pat Thomas
Section	Page Number	Organization	
4.3 Transportation		Prince William County Planning Office	
Comment			
<p>With regard to traffic impacts, the draft EIS assumes that no impact will be felt outside of a 3 to 5 mile radius of the base. The premise appears to be that traffic is already heavily congested, it is anticipated to be heavily congested without BRAC, and therefore the additional congestion caused by BRAC will go unnoticed – “disappear into the regional traffic flow.” We disagree and from the statements in the draft EIS regarding future relocation of employees, we believe that Prince William County and other points south of the base will “receive” some of these relocated employees, causing an increase in traffic along the already congested Route 1 and I-95 corridors.</p>			
Response			
<p>Some effects will be felt over a broader area. However, this is true of many large developments. It is generally accepted that, once the effects on the traffic flow fall below 10 percent of the traffic flow, effects are addressed by the normal planning and transportation funding mechanisms. VDOT has stated that 10 percent should be used, see comment S4.82 for their statement.</p>			

Commenter	Comment #	Comment Type	Name
L11	L11.3	Local Agency	Pat Thomas
Section	Page Number	Organization	
5 Cumulative Impacts		Prince William County Planning Office	
Comment			
<p>The draft EIS also appears to assume that the spaces in Northern Virginia that will be vacated (i.e. Crystal City, Reston and Bethesda office space) will not be backfilled with new employers and their employees. Given the strength of the regional economy and projected employment figures, it is foolish to presume that this space will lay vacant, or that it will only be filled at the expense of other office space in the region. This space will be filled, and those employees will be on our regional roadways.</p>			
Response			
<p>Section 4.3.1.3 includes documentation on the effect of the redistribution of employment. This approach simulates the effect of new office buildings in the corridor with previously occupied buildings reoccupied. The control total for the region is maintained by minor reductions spread across the region-based travel times. In this case, the net effect is that Crystal City employment decreases by up to 3 percent. Leased space text has been also revised in Cumulative Impacts Section 5.1.3.</p>			

Commenter	Comment #	Comment Type	Name
L11	L11.4	Local Agency	Pat Thomas
Section	Page Number	Organization	
4.3 Transportation		Prince William County Planning Office	
Comment			
<p>The draft EIS appears to develop a baseline of transportation projects that will be completed regardless of BRAC implementation, and presumes that all of those will be in place prior to, or at the same time, as implementation. The list includes projects that are currently unfunded or insufficiently funded. Presuming that those will all be in place is misleading, at best.</p>			
Response			
<p>The study team met with representatives from Fairfax County and VDOT to develop the baseline project list to use for the comparative analysis between alternatives.</p>			

Commenter	Comment #	Comment Type	Name
L11	L11.5	Local Agency	Pat Thomas
Section	Page Number	Organization	
4.3 Transportation		Prince William County Planning Office	
Comment			
In addition to the baseline of transportation projects, the draft EIS includes a list of transportation improvements to mitigate BRAC impacts. The only project located within Prince William County is the expansion of transit service from points south to both the main base and EPG. The draft EIS includes a cost estimate of \$12 million. There is no reference, however, to the source of that estimate, whether that includes capital and/or operating costs, how many years of service that covers, and what the source of funding might be.			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD. Conceptual costs presented was \$10 to \$12 million capital and \$6 to \$9 million operating budgets. The last paragraph of Section 4.3.4.4 covers transit services.			

Commenter	Comment #	Comment Type	Name
L11	L11.6	Local Agency	Pat Thomas
Section	Page Number	Organization	
4.3 Transportation		Prince William County Planning Office	
Comment			
The draft EIS mentions trying to meet a 5% or 10% mode split with transit, but only identifies minimal services from the south to reach these high assumptions. It also assumes a TDM plan that encompasses the hiring just one TDM coordinator to complete large scale commuter programs identified within the report.			
Response			
Adoption of the traffic demand management program and hiring appropriate staff to manage it, as well as transit services, will be addressed in the Record of Decision.			

Commenter	Comment #	Comment Type	Name
L11	L11.7	Local Agency	Pat Thomas
Section	Page Number	Organization	
4.3 Transportation		Prince William County Planning Office	
Comment			
The same list of transportation improvements that will mitigate the impacts does not include any road projects south of the Occoquan River and does not mention the needed widening / reconstruction of the Route 1 Bridge over the Occoquan to mitigate current and future demand caused by the bases expansion.			
Response			
The EIS shows only 10 to 15 percent of total traffic on Route 1 as BRAC traffic within Prince William County. It should be noted that some BRAC traffic already in existing traffic stream as they head to other destinations, as some NGA or WHS employees currently live in PW County and commute to such destinations as Pentagon City or Herndon.			

Commenter	Comment #	Comment Type	Name
L11	L11.8	Local Agency	Pat Thomas
Section	Page Number	Organization	
5 Cumulative Impacts		Prince William County Planning Office	
Comment			
The draft EIS does not attempt to estimate the spin-off impacts of the BRAC relocation. A large portion of Prince William County is within the desirable "15 mile" radius of the base, and we anticipate an influx of contractors and support services. None of the impacts of these "followers" are included in the EIS.			
Response			
The Study Team met with representatives from Fairfax County and VDOT to develop the land use plans that should be used. Through collaboration with and agreement from both agencies, it was determined that these future contractor tails represent speculation and that the current modeling tools do not provide the information or tools to assess these types of potential changes. Text has been revised in Cumulative Impacts Section 5.1.3 and qualitatively mentions the contractor tail. It has not been quantified because it is too speculative to do so.			

Commenter	Comment #	Comment Type	Name
L11	L11.9	Local Agency	Pat Thomas
Section	Page Number	Organization	
Other		Prince William County Planning Office	
Comment			
The draft EIS includes many statements of "minor adverse impact" without defining minor or, for that matter, major impacts.			
Response			
Whether an effect is significant is determined by reference to its context and intensity. Given the wide latitude in which such context and intensity have to be considered, the better practice is not to attempt to define significant or minor effects.			

Commenter	Comment #	Comment Type	Name
L12	L12.1	Private Citizen	Gerald Lyons
Section	Page Number	Organization	
Other		Mason Neck Citizens Association	
Comment			
We acknowledge the intense task being thrust upon governments and organizations involved. The association also acknowledges that the issues being addressed in the draft Environmental Impact Statement are so complex and so voluminous that it is difficult for residents to grasp everything upon reading documents in libraries and trying to download long documents.			
Therefore, we strongly recommend that a stakeholder group be established to meet regularly and often to review and understand each issue that pertains to the neighboring communities affected by the changes. We propose a partnership that includes the local associations, churches businesses that may be impacted by decisions made as a result of BRAC at Fort Belvoir.			
This tedious arrangement should reduce the adverse affects on the neighboring residents while improving decision making process. This process should not end tonight. We are concerned about the schedule and the funding.			
Response			
As prescribed by Council on Environmental Quality regulations and Army policies, the Army has conducted its environmental analysis process and path toward decision making openly with the public and interested federal, state, and local agencies. In addition to a scoping meeting at the outset of the NEPA process, the Army has held other public meetings to enable the public to be informed of relevant issues. The Army extended the public comment period on the draft EIS to 60 days to allow thorough review by the public and agencies. The Army has also hosted a "Board of Advisors" to keep community leaders informed of the status of BRAC. At neighborhood groups' request, the Army has provided knowledgeable personnel to appear at meetings to allow residents to ask questions and better understand the Army's proposals. These measures have been beneficial because they have enabled the Army to be aware of and sensitive to community concerns. As circumstances warrant, the Army can provide further opportunities for community awareness.			

Commenter	Comment #	Comment Type	Name
L12	L12.2	Private Citizen	Gerald Lyons
Section	Page Number	Organization	
4.3 Transportation		Mason Neck Citizens Association	
Comment			
Initially, some -- concerns, transportation, the impact of traffic is a major concern for our residents since Route 1 is our only access route. Even roads construction will have a major impact and we should be stakeholders in planning such changes.			
Response			
Comment noted. Transportation measures selected for implementation in the ROD will be carried through design and the public will be provided with adequate opportunity to comment through the NEPA and/or equivalent state public participation programs.			

Commenter	Comment #	Comment Type	Name
L12	L12.3	Private Citizen	Gerald Lyons
Section	Page Number	Organization	
Other		Mason Neck Citizens Association	
Comment			
Cultural and natural resources, because NVCA advocates for the preservation and protection of cultural and natural resources on our peninsula. We strongly encourage the highest standards of resource management be used.			
Response			
The Army holds itself to a high standard of environmental stewardship. In response, Fort Belvoir has adopted and implemented natural and cultural resource protection programs, integrated resource protection into its land use planning, and has retained expert, experienced managers to oversee these programs.			

Commenter	Comment #	Comment Type	Name
L12	L12.4	Private Citizen	Gerald Lyons
Section	Page Number	Organization	
4.10 Socioeconomics		Mason Neck Citizens Association	
Comment			
Safety, any and all action under consideration must take in account the personal safety of all residents during, before, and after implementation.			
Response			
Police, fire, and medical services in respect to public safety are addressed in Section 4.10.2.2.2 subsection "Police, Fire, Medical." Fort Belvoir personnel will continue to abide by applicable Army, federal, state, and local regulations and personnel that would be contracted to construct and work in the proposed BRAC facilities also would be required to abide by these applicable regulations.			

Commenter	Comment #	Comment Type	Name
L13	L13.1	Private Citizen	Judy Riggan
Section	Page Number	Organization	
4.9 Cultural Resources		Woodlawn Friends Meeting	
Comment			
In commenting on the DEIS, we would first note an error that requires correction. Throughout the document, Alexandria (Woodlawn) Friends Meetinghouse and Burial Ground are designated as a contributing resource in the National Register-eligible Woodlawn Historic District and the Fairfax County Woodlawn Overlay District. While this is true, as of September 2006, the Woodlawn Friends Meetinghouse became individually eligible for listing on the state and national registers of historic places, by action of the Virginia Department of Historic Resources. Included is a copy of their letter of notification to us. Commander Brian Lauritzen's February 9, 2007, letter and documents to initiate the Section 106 process for BRAC accurately designate us as individually NR-eligible. All information throughout the DEIS should be corrected to state our NR-eligible status accurately.			
Response			
Thank you for this information. The text has been modified accordingly.			

Commenter	Comment #	Comment Type	Name
L13	L13.2	Private Citizen	Judy Riggan
Section	Page Number	Organization	
4.9 Cultural Resources		Woodlawn Friends Meeting	
Comment			
Also, the DEIS historical overview given in 4.9.1.1, as derived from the Goodwin and Associates 2001 study, is imprecise. Information provided in 2006 to Fort Belvoir ENRD in the form of the PIF prepared by Woodlawn Friends can serve as a more complete and accurate historical reference.			
Response			
The text in section 4.9.1.1.2 subsection '17th and 19th Centuries' has been revised to include the historical information submitted to Fort Belvoir ENRD by Woodlawn Friends Meeting.			

Commenter	Comment #	Comment Type	Name
L13	L13.3	Private Citizen	Judy Rigglin
Section	Page Number	Organization	
4.9 Cultural Resources		Woodlawn Friends Meeting	
Comment			
<p>The DEIS presents many statements of potential and expected adverse effect to historical properties, including Woodlawn Friends Meetinghouse and Burial Ground, under the various alternatives for BRAC. Because so many variables and conditions are yet to be determined, Friends think that detailed responses are not meaningful at this point. The DEIS does not present complete information, so much as alternative possibilities, for BRAC action and resulting effects to historic properties. We note that the April 4, 2007, letter from Marc Holma, representing the Virginia DHR, speaks to our view of the situation.</p>			
Response			
<p>The EIS discloses that the level of information on the proposed projects at this time is very general, and that the analysis presented is based on the general information. More specific information would be used in the Section 106 analysis and consultation. Mr. Holma recognizes this necessary limitation of the EIS in his letter.</p>			

Commenter	Comment #	Comment Type	Name
L13	L13.4	Private Citizen	Judy Rigglin
Section	Page Number	Organization	
4.9 Cultural Resources		Woodlawn Friends Meeting	
Comment			
<p>We request that the following be subject to extensive documentation and discussion during the Section 106 consultation, as to mitigation for any potential adverse affect on our historic property:</p> <ul style="list-style-type: none"> • All factors of the proposed new Access Road/Control Point (Project 15) opposite Pence Gate • Increase in traffic on Route One • Any change to access to our property from Woodlawn Road • Any construction or development within our view shed • Cumulative increase in noise levels, from <ul style="list-style-type: none"> o increased traffic o the new control point construction and subsequent gate activity o the National Museum of the United States Army activities o changes in Belvoir land use designations • Presence of ordnance near our property • Privatization of Belvoir utilities, as Woodlawn Friends Meeting’s utilities are provided through Fort Belvoir connections, by long-standing agreement 			
Response			
<p>Your concerns and requests for analysis methodology will be taken into consideration during the Section 106 analysis and consultation. You may consider requesting consulting party status for the Section 106 process for the BRAC action, ensuring that your concerns would be heard by all involved.</p>			

Commenter	Comment #	Comment Type	Name
L13	L13.5	Private Citizen	Judy Rigglin
Section	Page Number	Organization	
Other		Woodlawn Friends Meeting	
Comment			
<p>Friends also strongly request that the National Museum of the United States Army not be located at the Pence Gate alternative site. We still favor its location at the EPG site.</p> <p>Within the limits of information provided by the DEIS, Woodlawn Friends at present favor the City Center Alternative.</p> <p>Friends question the inclusion of the revised land use plan as part of the DEIS, and comment that it would be better pursued as a separate study with documented reasons for the changed land use designations.</p>			
Response			
<p>The southern portion of the North Post golf course has been identified as a potential site, alternative to Pence Gate, for the museum. The Army will announce its decision of land use alternatives in the Record of Decision. Update of the land use plan is included in the EIS to enhance orderly development, in light of BRAC, of Fort Belvoir.</p>			

Commenter	Comment #	Comment Type	Name
L14	L14.1	Other Organization	Glenda Booth
Section	Page Number	Organization	
Other	4-344	Audubon Society of Northern Virginia	
Comment			
<p>First, there is no real coordination with local or state governments in terms of planning for land use, transportation, schools, air quality, watershed protection, police and fire services or other issues. The EIS on page 4-344 says that the Army "would confer" with Fairfax County. Conferring is not coordinating. We urge true coordination and compliance with all county and state environmental requirements.</p> <p>For example, Fairfax County is now preparing watershed plans for all of its 30 watersheds. These plans present an excellent opportunity to coordinate your development plans with the county.</p>			
Response			
Fort Belvoir has worked with Fairfax County through establishment of the Board of Advisors and other means. As appropriate, the Army gives due consideration to county requirements.			

Commenter	Comment #	Comment Type	Name
L14	L14.2	Other Organization	Glenda Booth
Section	Page Number	Organization	
Other		Audubon Society of Northern Virginia	
Comment			
<p>Second, the EIS at several points mentions the need for funds and estimates costs, but we are not aware of a firm commitment of funds from the DOD or the federal government or an intention to request funds from the U. S. Congress. According to Congressman James Moran on April 17, the DOD budget, includes no funds for transportation associated with BRAC. The absence of a commitment of sufficient federal funds is particularly disturbing in light of the exemption of DOD's properties from local real estate taxes and the demands that DOD activities place on local and state governments.</p>			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD. The appropriate function of an EIS is limited to identifying and describing reasonable mitigations for adverse impacts.			

Commenter	Comment #	Comment Type	Name
L14	L14.3	Other Organization	Glenda Booth
Section	Page Number	Organization	
Other		Audubon Society of Northern Virginia	
Comment			
<p>Third, we believe that the deadline of 2011 is totally unrealistic and that it should be extended substantially, if this development project moves forward.</p> <p>Fourth, while the draft EIS suggests that the basis for this proposal is the need to strengthen the security of military operations, in light of the events of September 11, 2001, we suggest that to move military jobs without adequate planning, on a weak or questionable assumption, and without adequate planning and assured funds, is hasty and irresponsible.</p>			
Response			
The BRAC law requires that BRAC recommendations be implemented within 6 years of the President's submission of the BRAC Commission's report to Congress. As circumstances develop, and as some Members of Congress have indicated, Congress may amend this requirement. The Army fully intends to conduct adequate planning before relocation of personnel to Fort Belvoir. Only additional legislation by Congress and the President would allow extension of the schedule beyond September 15, 2011.			

Commenter	Comment #	Comment Type	Name
L14	L14.4	Other Organization	Glenda Booth
Section	Page Number	Organization	
Other		Audubon Society of Northern Virginia	
Comment			
<p>"Minor Adverse Impacts"</p> <p>Throughout the draft EIS, impacts are described as "minor" -- impacts on air quality, water quality, traffic congestion and police, fire and social services, for example. For example, the EIS predicts a 10 percent increase in stormwater discharge in nine watersheds. We believe a 10 percent increase in stormwater discharge is not minor, especially in an area that already has seriously degraded streams.</p> <p>The EIS seriously understates and minimizes impacts. It is unclear how the DOD reached the conclusion that there would be "minor" impacts for any of the alternatives. How is DOD defining "adverse" and "beneficial" impacts?</p> <p>We note that 90 percent of the impacts described are adverse, leaving 10 percent as "beneficial." How can a community be expected to accept and fund the federal imposition of this kind of massive development when 90 percent of the impacts, as described by the DOD, are adverse?</p>			
Response			
Whether an impact is significant is determined by reference to its context and intensity. On the basis of careful consideration by subject-matter experts, the Army believes impacts are properly characterized.			

Commenter	Comment #	Comment Type	Name
L14	L14.5	Other Organization	Glenda Booth
Section	Page Number	Organization	
4.10 Socioeconomics		Audubon Society of Northern Virginia	
Comment			
<p>We believe that the draft EIS makes some assumptions without a basis, a "rosy scenario" approach. For example, on page ES-13, it says, "Over time, services (police, fire, medical, schools, social services) would 'adapt' to the demands of the increased population base, funded by new tax revenues" and on page 4-361, it states "services would adapt." We ask how will they "adapt"? Where will they come from? What will make them "adapt"? Who will "adapt" them?</p> <p>What level of government has assured funding or new taxes for these new services? Where will the "new tax revenues" come from? This kind of language is pure, generalized speculation, diminishes DOD's responsibility, provides no guarantees and has no place in an EIS.</p>			
Response			
Fairfax County and the National Capital Region (NCR) have experienced strong population growth during the last 20 years and are forecast to continue to have strong population growth, with or without the proposed BRAC action at Fort Belvoir. The proposed BRAC action would not require any of the affected federal employees to move. The BRAC action would only relocate jobs within the NCR. Because of the relocation of their jobs, some persons already living within the NCR might choose to relocate to Fairfax, Prince William, or other areas within the NCR for the purpose of improving their commute to Fort Belvoir. These would be gainfully employed, tax-paying citizens who would buy or rent property in the community in which they live. These taxes support public services. The text referred to by the commentor has been revised and the word "adapt" has been deleted.			

Commenter	Comment #	Comment Type	Name
L14	L14.6	Other Organization	Glenda Booth
Section	Page Number	Organization	
Other		Audubon Society of Northern Virginia	
Comment			
We are disturbed by the absence of an analysis of the additional contractors and related firms and their impact that will no doubt relocate to the Belvoir area if the BRAC actions occur. These associated impacts also will be substantial and the EIS is incomplete without an analysis or data. The public is poorly served without a complete assessment.			
Response			
Relocations to the Fort Belvoir area of contracting firms that support incoming units, agencies, and activities is both speculative and very difficult to estimate. The Army recognizes that some relocations might occur, but when such would occur or where the firms would take space cannot be estimated with enough certainty to enable traffic modeling or other types of analyses. As a general observation, it is noted that most such firms have multiple clients throughout the region and nationally; relocation to be close to only one of several clients might not be economically feasible or desirable from the firms' perspectives. Text has been revised in Cumulative Impacts Section 5.1.3 and qualitatively mentions the contractor tail. It has not been quantified because it is too speculative to do so.			

Commenter	Comment #	Comment Type	Name
L14	L14.7	Other Organization	Glenda Booth
Section	Page Number	Organization	
Other	4-271	Audubon Society of Northern Virginia	
Comment			
Mitigation - On page 4-271, there is a list of best management practices "that the Army can consider (italics ours) to reduce the impacts of the Preferred Alternative." It is not clear that this is a list of appropriate or adequate mitigation measures. In fact, on the same page and on page ES 21, it states, "No specific mitigation measures are identified." If this plan proceeds, as part of mitigation, we recommend that all native trees and all wetlands that are impacted be mitigated two to one and monitored for success for at least five years. We recommend, if this BRAC action proceeds, that the Army use low-impact development techniques for controlling stormwater runoff, build only "green," LEEDS-certified buildings, use Energy Star and the best energy and water-conserving appliances and facilities, low polluting vehicles, permeable pavements, natural landscaping and native plants. We strongly urge a commitment to specific funding and specific mitigation plans before moving forward, before the record of decision is signed, before any construction is begun and before any jobs are moved.			
Response			
In response to this comment and internal Army review, the FEIS clarifies the different roles of BMPs and mitigations. BMP are measures that must be implemented in accordance with applicable laws, Army guidelines, or installation policies and are considered an integral part of the proposed alternatives. Mitigations are additional protective measures that are to be considered for implementation by the ROD. In specific response to the comment, other general biological mitigations identified by the Army have been added to Section 4.14.5 of the EIS.			

Commenter	Comment #	Comment Type	Name
L14	L14.8	Other Organization	Glenda Booth
Section	Page Number	Organization	
4.2 Land Use		Audubon Society of Northern Virginia	
Comment			
Land Use Plan "Redesignations" - The plan proposes to reduce the current 12 designations to seven. We are very troubled by the inclusion of land use redesignations in this EIS and question what connection they have to BRAC. The current "Environmentally Sensitive" designation would be eliminated. Areas currently designated as Environmentally Sensitive or Outdoor Recreation under the 1993 land use plan (p 4-267) could be used for purposes incompatible with natural resources conservation, uses such as range/training, institutional, residential, airfield, retail stores, clubs and town centers. The EIS does not demonstrate why this redesignation is driven by BRAC. We strongly urge its deletion.			
Similarly we object to the construction of a family camp on Accotink Bay. Camps, especially those for recreational vehicles, will create more impervious surfaces, and a camp in general will create more pollution, more noise and more waste next to one of Northern Virginia's premier wetlands, an area used by many raptors, wading and other birds and other wildlife and very close to the Accotink Bay Wildlife Refuge. This area has played and continues to play an important role in the regional recovery of the bald eagle from endangered status.			
Response			
The project siting process on Fort Belvoir evaluates both compliance with land use designations and potential other issues with sites. Areas identified as sensitive (i.e., RPAs, wetlands) still retain their regulatory protections. See the responses to Comments L1.4 and F6.2. Secondly, the effects of construction and use of the Family Camp would be minimized to the maximum extent practicable.			

Commenter	Comment #	Comment Type	Name
L14	L14.9	Other Organization	Glenda Booth
Section	Page Number	Organization	
4.7 Water Resources		Audubon Society of Northern Virginia	
Comment			
Water Quality - The EIS finds on page 4-217 that seven sub-watersheds already exceed the 25 percent impervious threshold for clean streams (Stream quality shifts toward degraded water quality when impervious cover exceeds 25 percent, according to the Center for Watershed Protection.) We have two concerns: The EIS proposes no mitigation (page ES-21). It says that "a potential mitigation measure would be to develop a stormwater drainage system master plan study." To repeat: a study. A study is not a funded plan. A study is not mitigation. Second, the EIS proposes no clear coordination with Fairfax County as the county develops extensive watershed plans to comply with the 2010 Clean Water Act and Chesapeake Bay deadlines.			
Response			
As stated in the response to Comment L15.3, BMPs would be incorporated as discussed in Section 4.7. Proposed mitigation plans are appropriate within the scope of the EIS. Identification of funding sources is not available at this time. The Army would comply with all relevant and applicable federal, state, and local requirements to help ensure the Army's proper stewardship of its resources.			

Commenter	Comment #	Comment Type	Name
L14	L14.10	Other Organization	Glenda Booth
Section	Page Number	Organization	
4.3 Transportation	4-456	Audubon Society of Northern Virginia	
Comment			
<p>We underscore the concerns of U. S. Senators John Warner and James Webb, Congressmen James Moran and Tom Davis, Virginia Transportation Secretary Pierce Homer, Supervisors Gerry Hyland and Dana Kaufman, Board of Supervisors' Chairman Gerry Connolly, and Delegate Vivian Watts, as expressed at your April 17 meeting. It is incomprehensible why the EIS assumes on page 4-456 that 90 to 95 percent of employees will drive vehicles to work. In an area that is the third most congested in the country, where commuters waste hours in congestion every day, where the major air pollutants are from vehicle emissions, any credible plan should assume that the majority of employees will use public transportation to and from work - transit, rail, Virginia Railway Express, buses, and shuttles to the Metro subway stations. Belvoir should propose and fund a concrete plan so the vast majority of employees will have suitable alternatives to driving vehicles to work. Smart Growth principles should be planned and followed, if this development proceeds.</p>			
Response			
<p>Adoption of the traffic demand management program and hiring appropriate staff to manage it, as well as transit services, will be addressed in the Record of Decision. Funding of such will also be addressed in the ROD.</p>			

Commenter	Comment #	Comment Type	Name
L14	L14.11	Other Organization	Glenda Booth
Section	Page Number	Organization	
4.3 Transportation		Audubon Society of Northern Virginia	
Comment			
<p>Adding thousands more vehicles to the roads will no doubt create more pollution from vehicle emissions in the Fort Belvoir, Mount Vernon and Springfield areas. The EIS dodges this issue by presenting a "regional" analysis, purporting to show that spreading out current jobs all over the region will in fact reduce emissions. The EIS should focus on the immediate area of Fort Belvoir's properties, seriously examine and describe the impact of added vehicles on air quality in this immediate area. More vehicles, more idling and more congestion will not doubt create more air pollution.</p>			
Response			
<p>The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.</p>			

Commenter	Comment #	Comment Type	Name
L14	L14.12	Other Organization	Glenda Booth
Section	Page Number	Organization	
4.3 Transportation		Audubon Society of Northern Virginia	
Comment			
<p>Another concern is the wide disparity in the cost estimate for transportation projects needed to support the BRAC expansion. The estimate in the EIS is \$458 million (page ES-8). Fairfax County has estimated a need of \$1.3 billion, well over twice the DOD estimate. The final EIS should provide a real estimate and explain its basis.</p>			
Response			
<p>The county's transportation list includes projects outside of DoD's realm. The WMATA study shows that rail to Fort Belvoir is not feasible, see Section 4.3.3.3</p>			

Commenter	Comment #	Comment Type	Name
L14	L14.13	Other Organization	Glenda Booth
Section	Page Number	Organization	
4.3 Transportation		Audubon Society of Northern Virginia	
Comment			
<p>The suggestion that Belvoir "could appoint a Transportation Demand Coordinator" (pages ES-20 and 4-456) is a start, but only a minimal start. Without appropriate public transportation infrastructure, a transportation coordinator would have limited options and effectiveness.</p>			
Response			
<p>The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.</p>			

Commenter	Comment #	Comment Type	Name
L14	L14.14	Other Organization	Glenda Booth
Section	Page Number	Organization	
4.13 Hazardous Waste		Audubon Society of Northern Virginia	
Comment			
Unexploded Ordinance and Hazardous Waste - We are troubled by the discussion of unexploded ordinance and hazardous waste on pages 4-365 and 4-420 and the discussion of PCBs on page 4-426. Prominently absent is a schedule or deadline for cleaning these up. The final EIS should have a clear, specific, funded plan with a schedule and realistic deadlines for cleanup.			
Response			
These issues are required predevelopment activities. They are not part of the proposed action and are included only as required predevelopment activities.			

Commenter	Comment #	Comment Type	Name
L14	L14.15	Other Organization	Glenda Booth
Section	Page Number	Organization	
4.8 Biological Resources		Audubon Society of Northern Virginia	
Comment			
<p>· Fort Belvoir, with its diverse habitats, is home to many native bird species, including resident and migratory waterfowl, raptors, wading birds and numerous neotropical migrants that are in notable decline.</p> <p>· The EIS says that on the Main Post, there are at least 275 documented species (page 4-262).</p> <p>· Accotink Bay is a critical site for bald eagle nesting and foraging (the site where the EIS proposes to construct a family camp, page 4-270). This EIS, under all alternatives, further destroys and fragments habitat, introduces non-native species, all threats to birds, in an area where there is little natural habitat left. The analysis of the BRAC actions on birds and other wildlife is very deficient, lacking in current data. For the preferred alternative, concentrating development on the Engineering Proving Grounds (EPG), there is no real data of impacts on birds in the draft EIS.</p> <p>We have two points:</p> <p>(1) The EIS cites Fairfax Audubon Society (now the Audubon Society of Northern Virginia) data from nearby areas, not from the EPG itself.</p> <p>(2) The data used is eight years old.</p> <p>The description appears to be speculative and presumptive. Wording such as the nearby habitats "appear to provide good habitat" for grassland birds; "probably provide good habitat for bird species favoring rest interior habitat," (4-262); "some of the best habitat in the region for species favoring coniferous forests." These are not definitive data nor are these specific conclusions.</p> <p>Questions: Where is the survey data? When were the surveys done? What are the findings?</p>			
Response			
It is true that BRAC will further fragment and reduce habitats on post. Effects on ecological communities, inhabiting species, and particularly on the bald eagle are analyzed, and the findings are in the EIS. EISs are constructed from available data, and the most current available were used, including data on birds and habitats on EPG. Also see response to Comment L15.9.			

Commenter	Comment #	Comment Type	Name
L14	L14.16	Other Organization	Glenda Booth
Section	Page Number	Organization	
4.8 Biological Resources		Audubon Society of Northern Virginia	
Comment			
Silent on Buffers - The draft EIS makes no commitment to creating or maintaining natural buffers around the Preferred Alternative. At the 2006 scoping meeting, we asked Army officials about plans for buffers and provided information on the Army Compatible Use Buffer (ACUB) program. The Army already has mechanisms to create buffers. Officials at that meeting were unaware of the ACUB program. The draft EIS appears to ignore our suggestions. We again urge the creation of buffers for whatever development you undertake or alternative you choose, if you proceed.			
Response			
The ACUB program is designed to protect Army installations from off-post activities and development. The ACUB program is not appropriate for use as part of the Fort Belvoir proposed action; it is not designed to provide buffers from administrative space. In addition, little adjacent off-post undeveloped parcel space is available for purchase under the ACUB program. However, security setbacks from buildings have been integrated into the site layout at EPG, which also provides buffers between the development and off-post residential areas.			

Commenter	Comment #	Comment Type	Name
L15	L15.1	Private Citizen	Glenda Booth
Section	Page Number	Organization	
Other		Audubon Society of Northern Virginia	
Comment			
<p>In terms of this process, we believe that it is -- and I know that it was established by Congress, and so my comments are in part directed at the Congress, but I think that it is really egregious that the BRAC process does not seriously coordinate with local land use plans, local water shed plans, local transportation plans, and schools.</p> <p>The fact that the federal government can bring into a community such a massive development without true coordination with a local jurisdiction, I think is appalling. Another concern is the lack of funds, as others have described, and the 2011 deadline, I believe or we believe, is very unrealistic.</p>			
Response			
<p>The EIS is only one element of the Army's planning effort for BRAC implementation. The Army has shared its process with the community through the NEPA process, through its Board of Advisors, and by establishing an outreach site on the Web. Efforts such as these will continue. Also, the Army will pursue funding for BRAC implementation, as appropriate. The extent of funding availability cannot yet be known, however, because of budget cycles established by the Congress.</p>			

Commenter	Comment #	Comment Type	Name
L15	L15.2	Private Citizen	Glenda Booth
Section	Page Number	Organization	
Other		Audubon Society of Northern Virginia	
Comment			
<p>Next subject, "minor adverse impacts;" riddled throughout this document is that there are minor impacts on air quality, minor traffic congestion, minor impacts on police, fire, and social services. Ninety percent of the impacts in this document are adverse; very few are described as beneficial.</p> <p>We believe that many sections of it are a rosy scenario. For example, it says that local services would "adapt," it says that they would be funded by new tax revenues, but no where does it identify how these "adapptions" will take place or where these revenues would come from.</p>			
Response			
<p>The Army believes the draft EIS fairly characterizes the nature of the expected effects. As is often the case in resources being affected by development, the adverse effects do, in fact, out number the beneficial ones. The Army believes additional tax revenues will be generated by off-post development predicted to occur in the foreseeable future. The amount of these revenues cannot be well estimated.</p>			

Commenter	Comment #	Comment Type	Name
L15	L15.3	Private Citizen	Glenda Booth
Section	Page Number	Organization	
4.7 Water Resources		Audubon Society of Northern Virginia	
Comment			
<p>In terms of water quality, the document says there will be a ten percent increase in storm water discharge in nine water sheds and seven of the sub water sheds already exceed the 25 percent impervious threshold for a healthy stream. We believe that ten percent is not minor. We are disappointed that there's no mitigation proposed except a study, and there's no coordination that we can see with Fairfax County's water shed plans.</p>			
Response			
<p>As stated in the introduction for Section 4.7.2, BMPs and other stormwater management practices were not included in the impact analysis because of the need to identify final siting of proposed projects before stormwater management planning. Therefore, the analysis presents peak flow and pollutant loading results that will be substantially reduced by implementating effective stormwater management practices and mitigation efforts in compliance with all applicable federal, state, and local stormwater requirements. These future stormwater planning efforts were considered during the assessment of potential impacts. BMPs would be incorporated as discussed in Section 4.7.2.4. Proposed mitigation plans are appropriate within the scope of the EIS. Identification of funding sources has not yet been made. The Army would comply with all relevant and applicable federal, state, and local requirements to help ensure the Army's proper stewardship of its resources.</p>			

Commenter	Comment #	Comment Type	Name
L15	L15.4	Private Citizen	Glenda Booth
Section	Page Number	Organization	
Other		Audubon Society of Northern Virginia	
Comment			
A really serious flaw in this document is mitigation. Massive impacts, as others have described, impacts on natural resources, but no real commitment to mitigation. There's a list of potential mitigation projects, but those are only potential and we couldn't find any commitment of funds. So we agree that specific funding and mitigation plans should be a condition of moving forward before the record of decision.			
Response			
The Army will indicate in the Record of Decision its decisions with respect to commitment to and funding for mitigation actions.			

Commenter	Comment #	Comment Type	Name
L15	L15.5	Private Citizen	Glenda Booth
Section	Page Number	Organization	
4.2 Land Use		Audubon Society of Northern Virginia	
Comment			
We're very disturbed by the land use "re- designations" by the elimination of the environmentally sensitive category. We are very perplexed by that. We don't see what this has to do with BRAC, and so we hope that that does not go forward. We agree with the comments that there will be more congestion and thus, more pollution in our air from vehicle emissions.			
Response			
The project siting process on Fort Belvoir evaluates both compliance with land use designations and potential other issues with sites. Areas identified as sensitive (i.e., RPAs, wetlands) still retain their regulatory protections. See the response to Comment L1.4. Analysis has shown that there are would be a net reduction in trips in the region as a result of BRAC and thus less emissions because of congestion.			

Commenter	Comment #	Comment Type	Name
L15	L15.6	Private Citizen	Glenda Booth
Section	Page Number	Organization	
5 Cumulative Impacts		Audubon Society of Northern Virginia	
Comment			
We agree with others that the EIS is deficient in not analyzing the contractors that will relocate to the area.			
Response			
The study team met with representatives from Fairfax County and VDOT to develop the land use plans that should be used. Through collaboration with and agreement from both agencies, it was determined that these future contractor tails represent speculation and that the current modeling tools do not provide the information or tools to assess these types of potential changes. In addition, the "followers" (i.e. contractor tail) is not within the Army's control and is therefore not within the scope of the proposed action. Text however has been added to the Cumulative Impacts section. See the response to comment L11.8.			

Commenter	Comment #	Comment Type	Name
L15	L15.7	Private Citizen	Glenda Booth
Section	Page Number	Organization	
4.3 Transportation		Audubon Society of Northern Virginia	
Comment			
We cannot understand why in the transportation sections it assumes 90 to 95 percent of the people will drive. We should be starting with majority of people taking mass transit and public transportation as others have explained.			
Response			
The existing mode split was assumed for modeling purposes, then mitigating actions were developed. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD.			

Commenter	Comment #	Comment Type	Name
L15	L15.8	Private Citizen	Glenda Booth
Section	Page Number	Organization	
4.13 Hazardous Waste		Audubon Society of Northern Virginia	
Comment			
The document says there's unexploded ordinance and hazardous wastes at EPG, but there's no schedule or deadline for cleaning it up...			
Response			
These issues are required predevelopment activities. They are not part of the proposed action and as such are included only as required predevelopment activities.			

Commenter	Comment #	Comment Type	Name
L15	L15.9	Private Citizen	Glenda Booth
Section	Page Number	Organization	
4.8 Biological Resources		Audubon Society of Northern Virginia	
Comment			
...in terms of birds, we believe that Audubon is especially concerned about birds because they are the canary in the coal mine, and in terms of indicating the health of our environment, we believe that the analysis and the data are very inadequate. You have used some data that Fairfax Audubon collected, which is eight years old, so it's hard to even analyze your analysis when the data is so old. We have asked you to look into the ACUB Program for buffers.			
Response			
An EIS is built on existing data, and generally new field data is not collected to support an EIS. Fort Belvoir, however, did do several surveys to support this EIS. Bird surveys are conducted annually, and the EIS evaluated impacts using Partners in Flight species observations through 2006. Section 4.8.1.2.4 was updated to clarify data used in the analysis. However, to demonstrate habitat usage over the last several years, eight-year-old data referred to isn't "outdated" because in the case of EPG the bird species that migrated through 8-10 years ago are generally the same ones that will migrate through this year. Data on nearby areas is acceptable if habitats are similar, particularly on EPG.			

Commenter	Comment #	Comment Type	Name
L15	L15.10	Private Citizen	Glenda Booth
Section	Page Number	Organization	
Other		Audubon Society of Northern Virginia	
Comment			
In conclusion, I know my time is up, we believe that this document is very inadequate, that it's very troubling in re-designating the environmentally sensitive areas, that there should be clear, specific, and funded mitigation plans, there should be a commitment to coordinate with Fairfax County's rules, and a commitment to a sustainable environment and to an area that is already very seriously stressed. Thank you very much.			
Response			
The cited matters are addressed at various portions of the EIS. The Army has made a good faith effort to provide a complete evaluation of potential effects associated with an updated land use plan and BRAC implementation.			

Commenter	Comment #	Comment Type	Name
L16	L16.1	Private Citizen	Flip Webb
Section	Page Number	Organization	
4.4 Air Quality		Fairfax County Citizens Associations Env Committee	
Comment			
<p>My comments can be summed up and the project should not be allowed to go forward due to serious deficiencies and general conformity determination. The applicable general conformity regulation 40CFR in '93, subpart B, it's a different regulation than was cited in the document, states no department agency or instrumentality of the federal government shall engage in support in any way or provide financial assistance for licenses or permit or approve any activity which does not conform with the applicable implementation plan.</p> <p>Since the Washington Metropolitan area has been designated as non-attainment for the eight hour ozone and annual pm2.5, National Ambient Air Quality Standards, there are no SIP's that have been approved for these pollutants by EPA, and the estimated emissions are above the de minimus emission thresholds for precursors of both of these standards. Therefore, the project cannot go forward without the provisions of 40CFR '93, subpart B, being strictly adhered.</p> <p>Specific deficiencies are explained in more detail in my detailed comments, but deficiencies amount to the emissions of all criteria pollutants, carbonate monoxide, nitrogen dioxide, sulfur dioxide, pm10, pm2.5, lead, and in my opinion, also ozone must be modeled to prove the project will not "cause or contribute to any new violation of any standard or increase the frequency of severity of any existing violation of any standard in any area."</p> <p>Emissions did not include many indirect emission sources from the point -- including, for instance, contractors or electrical usage. The emissions have not been offset by contemporaneous reductions in emissions at other sources in the non-attainment area. There are required certifications that must be made by COG and the Governor of Virginia were not included. These deficiencies could have been addressed if the emission budgets had been included in the eight hour ozone SIP, currently going through public comment. But the Army did not participate in the process.</p> <p>The only way to resolve the issues now and continue the project would be to fully offset the anticipated emissions increases by purchasing emission reduction credits, which I do not believe exists in the Washington Metropolitan area.</p> <p>The model in resulting emissions ensure that no National Ambient Air Quality Standards will be exceeded in surrounding community. Even though there are no readily available emission reductions, credits in the non- attainment area, the Army may be able to satisfy the requirements of reducing mobile sources of emission possibly subsidizing mass transit, i.e., providing funds for WMATA or VRE to encourage mass transit. Thank you very much.</p>			
Response			
<p>The draft general conformity determination was prepared and included in the draft EIS and is included in Appendix E of this Final EIS for reference purposes. The Army is continuing to work with the Commonwealth of Virginia to identify mitigation measures required to conform. The concepts being agreed to include using a developable land calculation in apportioning the SIP inventory data, specifying the enforcement inspection and penalty clauses to be used to monitor mitigation measures during construction, including mitigation measures such as limiting construction on ozone action days, meeting new engine standards for non-road equipment, equipment substitutions, diesel retrofitting, anti-idling restrictions, and the use of alternative fuels. Potential mitigation measures are included in the EIS in Section 4.4.2.3. The Army must make public its Clean Air Act conformity determination by placing a notice by prominent advertisement in a daily newspaper of general circulation in the area affected by the action, and will do so once it is completed. Information on these mitigations will be included in the ROD. The Army will adopt the information provided in the comment regarding the miscited regulation in the Final GCD.</p>			

Commenter	Comment #	Comment Type	Name
L17	L17.1	Private Citizen	Frank Cohn
Section	Page Number	Organization	
4.3 Transportation		Mount Vernon Council of Citizens Association	
Comment			
<p>We like the EIS's statement about the appointment of an immediate -- of a transportation demand management coordinator, and we suggest that he be appointed immediately, regardless of the alternatives that are to be selected. We're already behind schedule if we're talking about 2011 for any new projects, and -- oh, sorry, thanks. And we suggest that Fairfax County be requested to appoint a 131 counterpart to this coordinator.</p> <p>The coordinator should be involved in setting priorities and determining funding resources. In other words, who will pay for what? We think that's going to be a big struggle all the way down the line. The funding, even if all of the amounts that the EIS indicates, if all that funding is allocated, it still will represent an immediate and a long range short fall in what will be needed in funding.</p> <p>There are added projects which need to be funded. The Fairfax County Federation of Citizen Associations passed a resolution of 20 additional projects, and that was supported by a resolution by the Mount Vernon Council, which recommended priorities and funding sources.</p>			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD.			

Commenter	Comment #	Comment Type	Name
L17	L17.2	Private Citizen	Frank Cohn
Section	Page Number	Organization	
4.3 Transportation		Mount Vernon Council of Citizens Association	
Comment			
<p>All of these are needed to have a successful area of transportation plan. The coordinator must address congestion from the Beltway to the Occoquan. The EIS statement that congestion will disappear three to five miles from Fort Belvoir, we do not believe in that.</p> <p>If you look at the traffic congestion that you have presently and you don't even know in the rush hour which way the rush hour is going because it's going both ways, any added traffic to that is going to be a real, real problem, and that goes for all of Route 1, from the Beltway to the Occoquan.</p>			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. The timeline will be considered during preparation of the ROD.			

Commenter	Comment #	Comment Type	Name
L17	L17.3	Private Citizen	Frank Cohn
Section	Page Number	Organization	
4.3 Transportation		Mount Vernon Council of Citizens Association	
Comment			
<p>Lastly, mass transit requirements; the EIS has stated no plans exist for Metro expansion of either blue or yellow lines. That is a red flag. We must do something about it. There is a transit study that has been authorized, and that transit study ought to be expedited. The legislature had provided funding for there already. The coordinator that you are suggesting ought to be in close contact with this study group. Thank you very much.</p>			
Response			
The WMATA study shows that rail to Fort Belvoir is not feasible, see Section 4.3.3.3.			

Commenter	Comment #	Comment Type	Name
L18	L18.1	Local Agency	Patricia Gallagher
Section	Page Number	Organization	
4.3 Transportation		National Capital Planning Commission (NCPC)	
Comment			
<p>I note with concern, however, that the BRAC action is expected to have significant effects on the transportation highway system adjacent to Fort Belvoir, regardless of the land use alternative selected. Unquestionable the region's transportation system is already strained under existing traffic volumes (2006 conditions) as demonstrated in the DEIS, and it will continue to be constrained under the anticipated growth of the whole region of Northern Virginia. Through the analysis of the four alternative land use plans, a series of transportation improvements have been identified to mitigate the effects of each of the alternatives. These improvements would be needed to maintain the transportation system's operational performance at an acceptable level of service and delay. Order-of-magnitude costs for the traffic mitigation actions are estimated to be \$458 million for the preferred alternative, and are recommended by the NCPC staff to be implemented by the army in its Record of Decision (ROD), with highest priority for all within the Defense Access Road Program, and include commitment to fund transit components as well.</p> <p>For the preferred alternative, the ability of transit to contribute to the mitigation of severe disruption and congestion is greater than for the other alternatives because it is one of two alternative that are closer to the regional rail network. Its location makes it feasible to achieve the NCPC supported target of at least 10 percent transit mode share for employee usage at Fort Belvoir by no later than 2012. Further more, bus service of a high quality to realize a 10 percent mode share for transit must complement the road network mitigation actions and be committed to in the ROD to reduce congestion and limit vehicle delays. The DEIS identifies five basic bus service areas, and examines general routes and service concepts to achieve a 5 or 10 percent mode share. The Commission staff notes that a 10 percent mode split would reduce by 725 the number of vehicles entering the post during peak hours. Again the staff strongly endorses and will anticipate a submission to NCPC, pursuant to National Capital Planning Act, the required Transportation Management Plan that established a 10 percent minimum goal. An additional consideration for the preferred alternative is that the needed transportation improvements can largely be constructed without interfering with existing traffic because the Engineering Proving Grounds (EPG) area of projects that will need to be constructed within active existing traffic zones and would further delay vehicle movements at critical links in the commuter road network that will also have its own ongoing planned improvements in essentially the same timeframe.</p>			
Response			
<p>The Record of Decision (ROD) will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. Adoption of the traffic demand management program and hiring appropriate staff to manage it will be addressed in the ROD.</p>			

Commenter	Comment #	Comment Type	Name
L18	L18.2	Local Agency	Patricia Gallagher
Section	Page Number	Organization	
4.2 Land Use		National Capital Planning Commission (NCPC)	

Comment

In regard to land use, the NCPC staff does not support the elimination of the designation of environmentally sensitive lands currently identified by the 1993 Commission approved plan.

The staff finds no justification for this land use modification beyond the DEIS citing the change allows flexibility for use functions, more area of developable acreage, and greater flexibility for future development without having to grapple with compatibility. Few and minor beneficial effects are estimated by the DEIS to emerge from preferred alteration of the land use title. The DEIS suggested designation as “community” indicated this category includes safety clearance, security areas, water areas, wetlands, conservation areas, resource protection areas (RPA’s), forest stands, and former training areas. Plainly some of these proposed activities are incompatible when not fully accounted for by meaningful descriptors of land use. Moreover, this re-labeling fails to denote that many of these lands are important natural resource buffers that assist in sustaining the functions of water areas, wetlands, conservation areas, resource protection areas (RPA’s), forest stands of the National Capital Region. Additionally, these attributes are sensitive lands for which the importance of their existence and function is emphasized throughout the DEIS analysis in such findings as:

- The Preferred alternative land use plan increases the post’s available acreage for development by approximately 800 acres, some occurring within the previous environmentally sensitive land use areas.
- Proposed on-post non-BRAC projects and off-post non-army project cumulative effects would further diminish the availability of forest and field habitats on and off the installation, and increase the possibility of occurrences of invasive species, edge effects on habitats, and habitat fragmentation.
- Long-term minor adverse effects on water resources would be expected from other on-post and off-post proposed development projects in the vicinity of Fort Belvoir that would potentially increase storm water runoff from paved surfaces and nonpoint source pollutants.

Furthermore, the NCPC staff does not agree with the DEIS conclusion and proponent’s justification that “changes in land use plans do not define the extent of effects [to soils, topography, and other natural systems] that would result if the plan were implemented”. Commission staff finds land use designations do define potential land use coverage and degree of impervious surface possibly present within areas in question, and consequently its relative impact to soils, watersheds, water quality, and vegetative cover that is achieved by the land use plan as a whole.

Response

The updated land use plan in the FEIS reclassified land use categories from the 1993 Master Plan in accordance with Army Regulation 210-20 and the Army’s Master Planning Technical Manual (MPTM). In addition to regulatory protection requirements, environmentally sensitive areas remain protected by mitigations identified in environmental assessments and in the 1991 BRAC ROD. In addition, the project siting process on Fort Belvoir evaluates both compliance with land use designations and potential other issues with sites. Areas identified as sensitive (i.e., RPAs, wetlands) still retain their regulatory protections. See the response to Comment L1.4.

Commenter	Comment #	Comment Type	Name
L18	L18.3	Local Agency	Patricia Gallagher
Section	Page Number	Organization	
4.7 Water Resources		National Capital Planning Commission (NCPC)	

Comment

This discrepancy is particularly important to water quality impacts and potential impart to the Potomac River. Surface water from Fort Belvoir drains directly to the Potomac river and to the lower reaches of three major Potomac River tributaries: Pohick Creek, Accotink Creek, and Dogue Creek. As noted by the DEIS, watershed modeling was used by the Army to assess potential cumulative effects on flow and pollutant loads affected by future development in the watersheds that drain Fort Belvoir. Further noted by the DEIS, in contrast to the land use designation noted above, is the indication and conclusion that “RPAs and riparian buffers also extend into areas proposed for land use designation changes. Encroachment into these areas decreases the buffer between developed land and sensitive natural resources”. The DEIS continues on to note the development and impervious surface cover results in potential changes in peak flows due to the preferred alternative. The storm events used to evaluate the impacts are described to correspond to the Commonwealth of Virginia’s Erosion and Sediment Control Regulations. The threshold used to determine potential adverse effects for the analysis is indicated as a 10 percent increase in peak flow occurring from a 1-year, 24-hour and 10-year, 24-hour storm event. As specified by the DEIS, nine subwatersheds were found to have greater than 10 percent increased in peak flow during the 1-year storm even under the preferred alternative, with one subwatersheds, except for one, would also experience at least a 10 percent increase in peak discharge during a 10-year within these drainage areas.

Response

The DEIS used the TR-55 model to quantitatively simulate precipitation and runoff conditions within subwatersheds on Fort Belvoir as described in Appendix F. As stated in the introduction to Section 4.7.2, these analyses were performed based on preliminary siting of BRAC projects within subwatersheds on Fort Belvoir; potential reductions in stormwater runoff and associated pollutants due to BMPs implementation and mitigation efforts were not considered in the analysis. BMPs, including those required by state regulations, are listed in Section 4.7.2.4.

Commenter	Comment #	Comment Type	Name
L18	L18.4	Local Agency	Patricia Gallagher
Section	Page Number	Organization	
5 Cumulative Impacts		National Capital Planning Commission (NCPC)	
Comment			
<p>Clearly the importance and need for the establishment of continued environmental sensitive land use description is required in the proposed land use plan modification for Fort Belvoir. It is unmistakable that the cumulative impact of the planned land use modification to the environment of the post and the region is measure in hundred of acres of adverse impact to stream floodplains, tens of acres of important impacted and fragmented forested land, and scores of acres of significant and important Chesapeake Bay associated streamside areas. These results are further stipulated in the DEIS in its noting that approximately 86 acres of high-intensity and 262 acres of medium-intensity development would be added to the installation by implementing the preferred alternative and that impervious surfaces would substantially increase in subwatersheds 1 (119 percent), 3 (32 percent), 25 (75 percent), 53 (910 percent), 54 (352 percent), 55 (325 percent), 58 (194 percent), and 59 (134 percent). The steady conversion of undeveloped land to impervious surface is an ongoing risk to the region's streamside forests and wetlands. Development densities that result in amplified storm water run-off volumes produce erosion, adverse nutrient loading, and added pollution problems for wetlands and lower watershed aquatic resources. Also, a loss of stream and forested habitat from the Potomac tributaries, combined with losses from other affected areas highlighted in the DEIS, demonstrated an overall significant impact that materially affects the regional biodiversity important to the Potomac River and region as whole.</p>			
Response			
<p>Section 4.7 and Section 5.7 recognize impacts from the increase in impervious surfaces. Section 4.7.2.4 discusses the use of effective stormwater management practices and mitigation efforts in compliance with all applicable federal, state, and local stormwater requirements to offset the increase in impervious surfaces. These future stormwater planning efforts using best available planning and design information were considered during the assessment of potential effects. The Army would comply with all relevant and applicable federal, state, and local requirements to help ensure the Army's proper stewardship of its resources.</p>			

Commenter	Comment #	Comment Type	Name
L18	L18.5	Local Agency	Patricia Gallagher
Section	Page Number	Organization	
4.8 Biological Resources		National Capital Planning Commission (NCPC)	
Comment			
<p>Another area of the DEIS lacking analysis of effects and mitigation relates to the discussion of biological impacts specifically regarding submerged aquatic vegetation (SAV) located within the vicinity of Fort Belvoir shorelines. This omission is important in particular to shallow water SAV of the ecosystem of the Potomac River. Proposed Fort Belvoir BRAC construction nutrient loadings (total nitrogen and total phosphorus) under the preferred alternative are identified but the significance and effect to SAV is not discussed. This is disturbing in that five of the subwatersheds draining to the Potomac show nutrient magnitudes as described in the following table that appears in the DEIS: [Table 4.7-9 shown from DEIS].</p> <p>Noticeably, under the heading of Biological Resources within the DEIS, there is no detailed discussion of the potential impact of any of the Fort Belvoir BRAC alternatives on SAV resources within the Potomac River and its tributaries. The importance and function of SAV to the river include:</p> <ul style="list-style-type: none"> •Generating food and habitat for waterfowl, fish, and invertebrates. •Adding oxygen to the River water column during photosynthesis. •Filtering and trapping sediment that otherwise would bury benthic organisms and cloud the water column. •Inhibiting wave action that erodes shorelines; and •Absorbing excess nutrients, such as nitrogen and phosphorus that may fuel the growth of unwanted algae in surrounding waters. <p>The significance of SAV impacts is sufficiently important to be discussed in the Fort Belvoir DEIS because of the potential increases in nutrient loading to the watersheds involving the Potomac River and the consequence to SAV. Specific criteria for cumulative significance and mitigation should also be explicitly identified and described for all impacted SAV resources.</p>			
Response			
<p>Text on SAV was added to Section 4.8.1.1 and Section 4.8.2.1.2.</p>			

Commenter	Comment #	Comment Type	Name
L18	L18.6	Local Agency	Patricia Gallagher
Section	Page Number	Organization	
Other		National Capital Planning Commission (NCPC)	
Comment			
Your consideration of our comments at this stage of the environmental review is most appreciated. Please place the Commission on the distribution list pertaining to all further environmental considerations of the 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia as they progress.			
Response			
Thank you for your comment. NCPC is included on the distribution list for the EIS in Section 7 of the EIS.			

Commenter	Comment #	Comment Type	Name
P 1	P1.1	Private Citizen	Eileen Hurley
Section	Page Number	Organization	
4.11 Aesthetics	0		
Comment			
My husband and I chose to live in Mt. Vernon (Mt Vernon Forest) because of its natural beauty and balance of residences and natural/native plant and animal life. I come here to ride and work with horses at Woodlawn Stables and appreciate the range of plant and wildlife (on land and air) afforded by this beautiful land on the Atlantic flyways on historic record.			
Response			
Comment noted. Thank you for your interest. Your comment will be made part of the administration record of the action. Fort Belvoir will continue to take the natural beauty of the area into account in its decisions.			

Commenter	Comment #	Comment Type	Name
P 1	P1.2	Private Citizen	Eileen Hurley
Section	Page Number	Organization	
4.5 Noise			
Comment			
The noise and pollution (air/water) along Rt 235 between Mt. Vernon Estate and Woodlawn has increased dramatically in the past 10 years - we live along the highway.			
Response			
The primary source of noise impact would be construction noise. Although the construction would last for four years, the noise would not be permanent. Noise effects due to construction would end after the period of construction. The Army would implement noise BMPs outlined in Section 4.5.2.3 the EIS. Impacts and mitigations for air quality are discussed in Section 4.4.2. Impacts and mitigations for water quality are discussed in Section 4.7.2. Cumulative impacts are discussed in Section 5.			

Commenter	Comment #	Comment Type	Name
P 1	P1.3	Private Citizen	Eileen Hurley
Section	Page Number	Organization	
4.8 Biological Resources			
Comment			
The wetlands (and supported wildlife) are already in peril - Dogue Creek, Little Hunting Creek and tributaries: Accoteek Creek; Pohick Bay - by its clear cut construction on South Post.			
Response			
Thank you for the comment. Your comment will be made part of the administrative record of the action.			

Commenter	Comment #	Comment Type	Name
P 1	P1.4	Private Citizen	Eileen Hurley
Section	Page Number	Organization	
4.9 Cultural Resources			
Comment			
I am a lover of nature and an historian by education and related employment. I fear over development is destroying environmentally and historic lands permanently. I am committed to saving our heritage and resources. I am a member of environmental and bird conservancy groups.			
Response			
Comment noted. Thank you for your interest. Your comment will be made part of the administrative record of the action.			

Commenter	Comment #	Comment Type	Name
P 2	P2.1	Private Citizen	John Hurley
Section	Page Number	Organization	
4.8 Biological Resources	0		
Comment			
I am very concerned about the adverse impact upon the eagles nurtured by the Federal Wildlife Refuge at Mason Neck as their flying range includes Fort Belvoir.			
The closure by the Army of Woodlawn Road and the extensive tree cutting by the Army for the RCI Residential construction has caused a risk to the flora, fauna with particular regard to wildlife such as Dogue Creek, Accoteek Creek, eagles, hawks, owls, deer, etc. and endangered frogs in the Pole Road area.			
Response			
Thank you for the comment. The comment deals with non-BRAC issues (closure of Woodlawn Road and RCI). The RCI action at Fort Belvoir is considered as a cumulative effect.			

Commenter	Comment #	Comment Type	Name
P 2	P2.2	Private Citizen	John Hurley
Section	Page Number	Organization	
4.3 Transportation			
Comment			
The addition of approximately 20,000 commuting day workers to Fort Belvoir will swamp at gridlock -			
- Route 95			
- Route One			
- Route 7100 (FC Pkwy)			
- Route 235 (Mt. Vernon Memorial Hwy)			
- George Washington Memorial Parkway at the National Park Service			
All of the above are overloaded NOW at commuting times.			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD.			

Commenter	Comment #	Comment Type	Name
P 3	P3.1	Other Organization	Gerald Lyons
Section	Page Number	Organization	
Other		Mason Neck Citizen's Association (MNCA)	
Comment			
Therefore, we recommend strongly that a stakeholder group be established to meet regularly and often to review and understand each issue that pertains to the neighboring communities affected by the changes. This arrangement should reduce the adverse effects on the neighboring residents, while improving the decision-making process.			
Response			
As prescribed by Council on Environmental Quality regulations and Army policies, the Army has conducted its environmental analysis process and path toward decision making openly with the public and interested federal, state, and local agencies. In addition to a scoping meeting at the outset of the NEPA process, the Army has held other public meetings to enable the public to be informed of relevant issues. The Army extended the public comment period on the draft EIS to 60 days to allow thorough review by the public and agencies. The Army has also hosted a "Board of Advisors" to keep community leaders informed of the status of BRAC. At neighborhood groups' request, the Army has provided knowledgeable personnel to appear at meetings to allow residents ask to questions and better understand the Army's proposals. These measures have been beneficial because they have enabled the Army to be aware of and sensitive to community concerns. As circumstances warrant, the Army can provide further opportunities for community awareness.			

Commenter	Comment #	Comment Type	Name
P 3	P3.2	Other Organization	Gerald Lyons
Section	Page Number	Organization	
4.3 Transportation	0	Mason Neck Citizen's Association (MNCA)	
Comment			
1. Transportation: The impact of traffic is a major concern for our residents since Route 1 is our only access route. Even road construction has a major impact and we should be stakeholders in planning such changes and determining their timing. A great deal more public information and interaction is needed in all transportation decisions and construction.			
In summary, we believe that many of the analyses in the DEIS are of extraordinary value to the community at large and to the implementation of BRAC at Fort Belvoir, especially those addressing economic impacts and transportation impacts. We would only emphasize here once again, the need of an EIS with important transportation implications, to reach beyond minimum NEPA requirements - to examine and report impacts at a scale commiserate with realistic regional influence. Further to that, we must observe that although the transportation impacts of BRAC are of great political and popular importance, a more publicly quiet environmental advocacy in those neighborhoods surrounding Fort Belvoir would wish to see the assessments of biological impacts and water quality impacts taken to a higher, even restorative, level of mitigation, including funding proposals.			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.			

Commenter	Comment #	Comment Type	Name
P 3	P3.3	Other Organization	Gerald Lyons
Section	Page Number	Organization	
4.9 Cultural Resources		Mason Neck Citizen's Association (MNCA)	
Comment			
2. Cultural and Natural Resources: Because MNCA strongly advocates for the preservation and protection of cultural and natural resources on our peninsula, we strongly encourage that the highest standards of resource management be used. The Belvoir peninsula has a large number of cultural and natural resources and is physically and historically aligned with Mason Neck. Full identification of resources in the intended impact areas should be done and evaluations made based upon federal and state guidelines in efforts to mitigate any negative impact.			
Response			
Comment noted. The Army and Fort Belvoir strive to protect all cultural resources and will continue to comply with all applicable requirements in this regard.			

Commenter	Comment #	Comment Type	Name
P 3	P3.4	Other Organization	Gerald Lyons
Section	Page Number	Organization	
Other		Mason Neck Citizen's Association (MNCA)	
Comment			
3. Safety: Any and all actions under consideration must take into account the personal safety of all residents, before, during, and after implementation.			
Response			
The Army maintains an extensive safety program. The Army prescribes policy, responsibilities, and procedures to protect and preserve Army personnel and property against accidental loss. It also provides for public safety incident to Army operations and activities, and safe and healthful workplaces, procedures, and equipment. Army Regulation 385-10, The Army Safety Program, assures statutory and regulatory compliance.			

Commenter	Comment #	Comment Type	Name
P 4	P4.1	Private Citizen	Gary Kitchen
Section	Page Number	Organization	
4.13 Hazardous Waste			
Comment			
1. Paragraph 4.13.2.3 states that environmental and health risks will be controlled by implementing existing programs, policies, regulations, and standard operating procedures, and that harm to humans and the environment from hazardous substances and hazardous materials would be included in these requirements.			
We express significant concern over the Army's ability to properly identify, handle and dispose of hazardous wastes resulting from building demolition, renovation or infrastructure improvements required to implement any action. The Draft Environmental Impact Statement (DEIS) discusses liquid PCBs but does not address solid PCBs which may be contained in numerous material applications throughout the facility, as the Army has historical knowledge of known applications where this type of contamination may be present. These applications include insulation and sound dampening materials; plastics, rubber materials and adhesive tape used in electrical cabling; paint formulations; fluorescent light ballasts; gaskets in HVAC and other duct systems; ceiling tiles; flooring and floor wax/sealants; roofing and siding materials; caulking and grout; waterproofing compounds; anti-fouling compounds, and fire retardant coatings; and coal tar enamel coatings for steel water pipe and underground storage tanks. These applications should be assumed to be regulated unless proven otherwise by approved grab sampling procedures. In addition, electrical cables should also be assumed to contain friable asbestos unless proven otherwise by sampling or other verifiable means.			
The DEIS incorrectly states that PCBs are regulated at concentrations greater than 50 ppm.			
Response			
Fort Belvoir complies with all federal state local and Army regulations with regard to testing and proper disposal of all waste generate on the installation. Fort Belvoir ENRD inspects facilities slated for demolition and prepares a demolition checklist that identifies mercury-containing components, lead halide emergency lights and possible PCB-containing light ballasts. This waste is turned over to Fort Belvoir waste management for proper disposal of all regulated waste.			

Commenter	Comment #	Comment Type	Name
P 4	P4.2	Private Citizen	Gary Kitchen
Section	Page Number	Organization	
Other			
Comment			
2. The List of Preparers should have the respective Government Organization/Activity name or associated Company name listed for each individual.			
Response			
All preparers listed in Section 6 are personnel of or subcontractors to the firm that provided technical assistance to the USACE as stated on the cover of the EIS.			

Commenter	Comment #	Comment Type	Name
P 4	P4.3	Private Citizen	Gary Kitchen
Section	Page Number	Organization	
Other			
Comment			
3. The General Conformity Determination is incomplete as it only addresses construction activities and employee commutes to/from the facility but does not address emissions resulting from support contractors traveling to/from the facility, whether they are relocating to nearby office spaces or transiting from their current locations; does not support emissions resulting from supply, service, or support vehicles transiting to/from the facility; nor does it include the emissions occurring from transient activities such as employees traveling off the facility for lunch. These impacts are also required to be analyzed.			
Response			
"Embedded" contractors are included in the net increase of 22,000 personnel relocating to Fort Belvoir. The number of contractors who might visit Fort Belvoir occasionally are not reasonably foreseeable. The Army hesitates to conclude that firms supporting the Army will relocate their offices to the immediate vicinity of Fort Belvoir. Most contractor firms serve multiple clients, both in the National Capital Region and nationally; the relocation of just one client is unlikely to cause the firm to relocate its offices. The Army is satisfied that it has appropriately included all relevant activities and populations in assessing direct and indirect air emissions in its General Conformity Determination.			

Commenter	Comment #	Comment Type	Name
P 4	P4.4	Private Citizen	Gary Kitchen
Section	Page Number	Organization	
4.12 Utilities			
Comment			
4. Utility migration measures are based upon Dominion Virginia Powers ability to upgrade its existing off-site capability significantly. However, Dominion Virginia Power presently is predicting insufficient capacity to meet an anticipated 2011 electrical demand, and currently does not have approval for accomplishment of the infrastructure upgrade from the State Corporation Commission. The DEIS Utility mitigation measure is a significant adverse impact and poses an unacceptable risk of insufficient electrical capacity and rolling blackouts to the surrounding resulting from the proposed action.			
Response			
No substantiated evidence has been presented that there is not enough electrical capacity to implement the BRAC action.			

Commenter	Comment #	Comment Type	Name
P 4	P4.5	Private Citizen	Gary Kitchen
Section	Page Number	Organization	
4.3 Transportation			
Comment			
5. The DEIS only addresses employee traffic impacts during peak commuting periods, but does not address the traffic impacts resulting from support contractors traveling to/from the facility whether they are relocating to nearby office spaces or transiting from their currently locations; from supply, service, or support vehicles transiting to/from the facility; nor does it address impacts resulting from transiting trips such as employees traveling off the facility for lunch. These impacts are also required to be analyzed.			
Response			
Peak periods were examined as they represent the worst travel time period of the day. Non-embedded contractors are covered by the number of visitors assumed. The number of visitors assumed is consistent with that experienced by the Pentagon today - between 900 and 1,000 daily. Site development is ongoing to improve amenities on-site.			

Commenter	Comment #	Comment Type	Name
P 4	P4.6	Private Citizen	Gary Kitchen
Section	Page Number	Organization	
4.3 Transportation			
Comment			
6. Traffic mitigation measures are predicated on accomplishment of numerous projects beyond the Army's cognizance and control. We consider any action, other than the no alternative action, to be a significant adverse impact and unacceptable risk to the public until all projects upon which the mitigation measures are predicated are programmed, fully funded, and accomplished.			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD.			

Commenter	Comment #	Comment Type	Name
P 5	P5.1	Private Citizen	Yolanda Nicholson
Section	Page Number	Organization	
4.8 Biological Resources			
Comment			
Undeveloped forested land is one of Fort Belvoir's greatest public resources. It is virtually irreplaceable if lost. In a time of disappearing natural resources it is vital that green spaces be retained. Any plan that develops the remaining space should disturb the minimum number of wooded acres.			
Preserving these spaces is vital to quality of life and in fact the very ability to sustain life.			
Fort Belvoir's green spaces are truly a national treasure. Please do all possible to retain them.			
"I think that I shall never see a poem as lovely as a tree..." providing:			
- Quiet peaceful space to preserve a sense of sanity			
- Home of wildlife			
- Air cleaning factory			
- Erosion control			
Think twice before clearing or even opening up any land.			
Response			
Thank you for the comment. No change was made to the document. Fort Belvoir will site and design all projects to minimize impacts on natural resources and the environment. The Army supports ecological stewardship as a Service-wide goal, and will implement BMPs as mentioned in Section 4.8.2.5 to retain as much of the natural environment on the installation as practicable.			

Commenter	Comment #	Comment Type	Name
P 6	P6.1	Private Citizen	
Section	Page Number	Organization	
4.2 Land Use			
Comment			
<p>The Belvoir Draft BRAC EIS makes it very clear that this "EIS pertains to the initial step of the Real Property Master Plan (RPMP) update process - to revise the land use plan which must happen before the Army can begin siting facilities for BRAC implementation (ES.4.1 Land Use Plan Update)." This EIS gives the impression that with the approval of this EIS the RPMP will be approved and changed.</p> <p>The Draft EIS states "the Belvoir Master Land Usage Plan must be changed from the current approved 1993 plan as amended in 2002 in order to make final recommendations on the siting of various BRAC facilities." A perfect example is changing the land use of the current South 9 golf course from outdoor recreation to professional/institutional. Without first changing the land usage designations the siting of the hospital cannot take place.</p> <p>It seems that Fort Belvoir garrison is putting the Belvoir Master Land Usage Plan on the fast-track and not doing an extensive analysis on the reasons and impacts of changing the land usage that should be done with changing such an important document. The Draft EIS does mention that the Master Land Usage will be further developed in the future. The coupling of the Belvoir Master Land Usage Plan with the Belvoir BRAC EIS gives the impression that the garrison is trying to hide something and trying to slide this important document under the radar in order to get the Belvoir EIS completed so that construction can begin.</p> <p>No place in the Draft Belvoir BRAC EIS is there a clear definition of the new land use categories (Airfields, Community, Industrial, Professional/Institutional, Residential, Training, and Troop) that one could make an educated guess on what type of facilities could be built and compatible with that land usage.</p> <p>Recommend the Final Belvoir EIS clearly identify and define each of the new land usage categories and the types of facilities compatible with that land usage category so that it can be a matter of record.</p>			
Response			
<p>The Army is proceeding in an orderly and prudent manner to determine the future course of Fort Belvoir, while at the same time meeting the BRAC timeline mandated by Congress. Adoption of an updated land use plan is the first step in that process, but this EIS would not formally approve the RPMP update. Rather, revision of the post's Real Property Master Plan is underway, and follow-on NEPA documentation would analyze the environmental impacts of that plan. The updated RPMP would not be approved until that NEPA document is complete. The land use designations are described in Section 2.2.1.2 of the EIS.</p>			

Commenter	Comment #	Comment Type	Name
P 7	P7.1	Private Citizen	
Section	Page Number	Organization	
Other			
Comment			
<p>Belvoir BRAC has planned for a hospital and along with that hospital comes a Medical Evacuation helipad to receive injured patients. The hospital will be bigger and receive more patients than the current DeWitt Community Hospital. Helicopters could be flying into and out of that helipad 24/7 in all types of weather conditions. No place in the Draft Belvoir BRAC EIS does it address the safety impacts for the use of that helipad and any safety concerns for the residents of the family housing, traffic on the major roads adjacent to each hospital site, power lines, and the planned flight patterns for each land use alternative.</p>			
Response			
<p>Flight operations at the proposed hospital must comply with all relevant Federal Aviation Administration and Army regulations. These include due regard for flight safety. Consistent with Army policy, designation of arrival and departure flight corridors will take into account potential noise effects on receptors in the vicinity of the hospital.</p>			

Commenter	Comment #	Comment Type	Name
P 7	P7.2	Private Citizen	
Section	Page Number	Organization	
4.5 Noise			
Comment			
It also seems helicopter engine noise from the use of the helipad will be higher and will be a problem. It also has not been assessed.			
Aircraft noise from Davison Army Airfield has been assessed and the aircraft noise from the airfield on each of the land use alternatives has been assessed but the helicopter aircraft noise generated by the hospital location has not been assessed for each of the land use alternatives.			
Response			
Thank you for your comment. The Army has incorporated the commenter's information into Section 4.5 of the FEIS.			

Commenter	Comment #	Comment Type	Name
P 7	P7.3	Private Citizen	
Section	Page Number	Organization	
Other			
Comment			
Recommend the Final Belvoir EIS address the safety concerns for people on the ground, in office buildings, in schools, on outdoor recreational sites and in cars created by the hospital helipad for each land use alternative and address the aircraft noise impacts for each alternative generated by the hospital helipad.			
Response			
Flight operations at the proposed hospital must comply with all relevant Federal Aviation Administration and Army regulations. These include due regard for flight safety. Consistent with Army policy, designation of arrival and departure flight corridors will take into account potential noise impacts on receptors in the vicinity of the hospital. The Army believes that information that might be obtained from modeling of noise contours for either the Preferred Alternative or City Center Alternative would only marginally affect decision making.			

Commenter	Comment #	Comment Type	Name
P 8	P8.1	Private Citizen	David Kerner
Section	Page Number	Organization	
4.3 Transportation			
Comment			
As the crow flies, my house in Alexandria is about 11 miles from my office at the Defense Threat Reduction Agency HQ on Ft. Belvoir. That's a very reasonable distance for bicycle commuting. Unfortunately, the crow isn't the one to dictate paths, and safe routes of reasonable distance have not been established; to travel safely from home to office by bike would take almost 30 miles; which is a real disincentive to biking to work. It would be helpful for Ft. Belvoir to weigh in with potential solutions during the planning stages mentioned in the draft EIS; the development of mapped and marked routes that support safe cycling between Ft. Belvoir and all points north, south, east, and west.			
Response			
Fort Belvoir's upcoming Master Plan Update and associated NEPA documentation will provide information about the installation's trails and possible incorporation into regional trail systems.			

Commenter	Comment #	Comment Type	Name
P 9	P9.1	Private Citizen	Michael Brownell
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>Route 1 needs to be widened from the Woodrow Wilson Bridge interchange (I-495) all the way to Fort Belvoir. It is a mistake to think that the majority of the additional traffic generated by BRAC will use the Fairfax County Parkway. Many people will use the Route 1 corridor because they will buy home there and/or go shopping or dining on Route 1 on the way to or from work. There is no shopping available on the Fairfax County Parkway.</p> <p>People who live in Maryland will cross the Wilson Bridge and take the shortest route to Fort Belvoir which is, of course, Route 1. Route 1 is currently saturated with traffic and there is simply not sufficient capacity to add more cars on this route. There is also an immediate need to extend the Metrorail system from Huntington to Fort Belvoir and to make provision for a future light rail or trolley line down Route 1, both of which will require the widening of Route 1.</p>			
Response			
Comment noted. The Study Team worked with VDOT and Fairfax County to determine appropriate assumptions.			

Commenter	Comment #	Comment Type	Name
P 9	P9.2	Private Citizen	Michael Brownell
Section	Page Number	Organization	
4.2 Land Use			
Comment			
<p>The proposed location of the Army Museum is not convenient and I predict that it will not be successful. I would prefer to see the museum located at a future MetroRail or trolley stop near the main entrance to Fort Belvoir. It needs a hi-visibility location so that people will stop in on the spur of the moment while visisting Mount Vernon and other local attractions. Most people are not likely to plan to go there as a special trip.</p>			
Response			
Establishment of the Army museum will be subject to NEPA analysis. No final siting of the museum has yet been determined.			

Commenter	Comment #	Comment Type	Name
P10	P10.1	Private Citizen	Dianne Kelly
Section	Page Number	Organization	
Other			
Comment			
<p>The document is located at the Sherwood Library. Only a partial review was made of the Executive Summary. This review is not complete.</p> <p>These are a few of the recommendations to be included in the Executive Summary.</p> <p>1. Affected Jurisdiction. Should include Prince William County.</p>			
Response			
Based on a lack of activity proposed to occur there, the Army does not consider Prince William County to be an affected jurisdiction.			

Commenter	Comment #	Comment Type	Name
P10	P10.2	Private Citizen	Dianne Kelly
Section	Page Number	Organization	
Other			
Comment			
<p>2. Abstract. Should state Ft. Belvoir and the surrounding areas. (Examples: Interstate 95, Telegraph Road and Jeff Davis Highway also known as Route 1, are the major roads which all intersect with the Fairfax Parkway</p>			
Response			
The abstract states, "This [DEIS] considers the proposed implementation of the BRAC recommendations at Fort Belvoir, Virginia." Potential effects off-post are identified throughout the document.			

Commenter	Comment #	Comment Type	Name
P10	P10.3	Private Citizen	Dianne Kelly
Section	Page Number	Organization	
Other			
Comment			
3. Exact dates of issuance is not acknowledged, is that because it is written as a draft? In any case, I am not sure when the sixty (60) day period begins and ends.			
Response			
The Federal Register notice cited in the abstract indicated that the public review period began on March 2, 2007, and ended on May 1, 2007.			

Commenter	Comment #	Comment Type	Name
P10	P10.4	Private Citizen	Dianne Kelly
Section	Page Number	Organization	
4.2 Land Use			
Comment			
4. Formally, Ft. Belvoir was a troop support and training mission. Now it will be Administration and Logistics. Is anyone leaving? If know one is leaving, it should state it will continue troop support and training mission and will now add administration and logistics support.			
Response			
The post's present mission is to operate and maintain the installation; execute mobilization requirements, military operations, and contingency/force protection missions; and to provide essential administrative and basic operations support to its tenant organizations. This information is in section 5.1.1			

Commenter	Comment #	Comment Type	Name
P10	P10.5	Private Citizen	Dianne Kelly
Section	Page Number	Organization	
4.2 Land Use			
Comment			
5. Please include a map (if not included, or else state where it is; page #) to identify the 800 acres for professional use, initial use, residential...).			
Response			
This information is in Figure 2-2.			

Commenter	Comment #	Comment Type	Name
P10	P10.6	Private Citizen	Dianne Kelly
Section	Page Number	Organization	
Other			
Comment			
6. ES.4.1 Land Use Plan Update. 7 areas - page ES - 2&3. This probably should state the location of maps on these pages to see what we are reading about in the Executive Summary. Include the buffer zones.			
Response			
The Executive Summary contains only major points of the EIS. To locate topics of interest, including figures, see the Table of Contents.			

Commenter	Comment #	Comment Type	Name
P10	P10.7	Private Citizen	Dianne Kelly
Section	Page Number	Organization	
Other			
Comment			
7. Page ES-3, do a breakout in 8 categories by the number of people, instead of 6 categories. This will be a good visual of the actual. (It leaves no room for error. Probably the numbers will change by 2011.) 146 personnel locations which would support units, agencies and activities within Ft. Belvoir.			
Response			
The Executive Summary contains only major points of the EIS. Details concerning the proposed action and alternatives are presented in Sections 2 and 3, respectively.			

Commenter	Comment #	Comment Type	Name
P10	P10.8	Private Citizen	Dianne Kelly
Section	Page Number	Organization	
Other			
Comment			
New title for ES.4.3. Schedule for Implementation Proposed.			
Response			
Comment noted. The text was not changed.			

Commenter	Comment #	Comment Type	Name
P10	P10.9	Private Citizen	Dianne Kelly
Section	Page Number	Organization	
Other			
Comment			
9. ES. 5 Alternatives. I was unable to find the three (3) other land use plans. Need to make subtitles. I could not find them in section 2. Also it would be wise to include a before and after picture, description with each alternative. It further provides an accurate, precise, information, (less for error).			
All together you have four (4) plans. A clear way to write this is the Preferred Plan and three (3) options. ES.5.4. Change Title Preferred Plan..., Alternate 1 or Option 1..., Alternate 2 or Option 2..., Alternative 2 or Option 3....			
Response			
The Army has organized its presentation for optimal understanding by the public and interesteds agencies. The arrangement of the material comports with general Army policy and practice in presenting the results of environmental impacts analysis. Without further justification for change, none was made.			

Commenter	Comment #	Comment Type	Name
P11	P11.1	Private Citizen	Lee Schroeder
Section	Page Number	Organization	
4.8 Biological Resources			
Comment			
Is this activity on the EPG going to threaten the wood turtle (state endangered) or the Bald Eagle (federally threatened)?			
Response			
Effects on wood turtle are addressed in Section 4.8.2.3.			

Commenter	Comment #	Comment Type	Name
P11	P11.2	Private Citizen	Lee Schroeder
Section	Page Number	Organization	
4.3 Transportation			
Comment			
Is there going to be a high speed nonstop monorail for the MD people to use? This could be a gv't only system, rail going from Bethesda to [can't read] EPG? This would make it easier on the commute for MD people, relieve congestion in VA.			
Response			
Such a system would not be feasible. WMATA examined the feasibility of a fixed guideway system from the Franconia-Springfield Metrorail Station to Fort Belvoir, including Metro extension and a new LRT line, and would tie into the existing Metro system. Both were determined to be unfeasible. Thus, the desired system from the commentor would not be feasible because of the length of the system and lower ridership. See response to Comment P15.1.			

Commenter	Comment #	Comment Type	Name
P11	P11.3	Private Citizen	Lee Schroeder
Section	Page Number	Organization	
Other			
Comment			
This BRAC was decided on by people and people do make mistakes, so is this a wise use of money? Where is the money going to come from? Shouldn't the money be secured 1st before anything is built or broken ground?			
Response			
The Anti-Deficiency Act prohibits the Army's commitment to expend funds prior to their being made available by Congress. Funding sources must be identified before implementation phases can proceed.			

Commenter	Comment #	Comment Type	Name
P11	P11.4	Private Citizen	Lee Schroeder
Section	Page Number	Organization	
Other			
Comment			
Isn't this mass move going to encourage sprawl?			
Response			
The Army and its development consultant (Belvoir New Vision Planners) will proceed in an orderly, responsible fashion. Avoidance of sprawl is an objective of sound land use planning.			

Commenter	Comment #	Comment Type	Name
P11	P11.5	Private Citizen	Lee Schroeder
Section	Page Number	Organization	
4.3 Transportation			
Comment			
What about telecommuting? Shouldn't this factor into the decision about moving NGA-Bethesda since ~40% of the people that work there live in MD?			
Response			
Telecommuting is one option of the TDM coordinator as a mitigating action. Adoption of the traffic demand management program and hiring appropriate staff to manage it will be addressed in the Record of Decision. The ROD will also address funding for such programs.			

Commenter	Comment #	Comment Type	Name
P12	P12.1	Private Citizen	Frank Cohn
Section	Page Number	Organization	
4.3 Transportation		Mount Vernon Council of Citizens' Associations	
Comment			
1. Immediate Appointment of a Transportation Demand Management Coordinator (TDMC): The proposal for an appointment of a TDMC is an excellent idea. One should be appointed immediately and Fairfax County should be requested to appoint a counterpart. Action needs to be taken immediately, since the 2011 BRAC completion date places any new significant project already behind schedule, considering the need to determine funding sources and time for design and construction. The TDMC must be assured of adequate resources and authority to fulfill the projected mission.			
Response			
The Record of Decision will indicate which transportation mitigation actions such as the TMDC will be adopted, as appropriate. The ROD will also address funding for such programs.			

Commenter	Comment #	Comment Type	Name
P12	P12.2	Private Citizen	Frank Cohn
Section	Page Number	Organization	
4.3 Transportation		Mount Vernon Council of Citizens' Associations	
Comment			
2. Set Priorities and Determine Funding Sources: The voluminous data provided in the EIS, depicting existing conditions and delineating projects underway or projected for completion by 2011, should serve as a good starting point, to permit the TDMC to prioritize requirements, add projects deemed necessary and initiate action to determine who will pay for what. The currently provided budget estimates, regardless of option to be selected, will not accommodate all requirements to be developed by the TDMC, even if Federal funding can be secured for the full amounts cited in the EIS, plus any currently requested Federal funding for spot transportation improvements related to the Fort Belvoir BRAC.			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD.			

Commenter	Comment #	Comment Type	Name
P12	P12.3	Private Citizen	Frank Cohn
Section	Page Number	Organization	
4.3 Transportation		Mount Vernon Council of Citizens' Associations	
Comment			
3. Fund Added Projects: Funding will be needed for the 20 transportation projects, outside Fort Belvoir, that the Fairfax County Federation of Citizens Associations (FCFCA) identified by resolution and the MVCCA supported with its own resolution, deeming these projects essential for a successful area transportation plan. Answers must be developed for each project and consensus obtained as to who will pay for what.			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. Funding of transportation projects will also be addressed in the ROD.			

Commenter	Comment #	Comment Type	Name
P12	P12.4	Private Citizen	Frank Cohn
Section	Page Number	Organization	
4.3 Transportation		Mount Vernon Council of Citizens' Associations	
Comment			
<p>4. Addressing Congestion from the Beltway to the Occoquan: The EIS appears to be overly optimistic with its statement that the expected increase in traffic and congestion will disappear within 3-5 miles from Fort Belvoir. Current congestion on Route #1, for example, exists both northbound and southbound during each rush hour, mornings and evenings. Any added traffic potentially threatens gridlock. Assuming road construction projects are undertaken and completed, the TDMC must consider the road net from the Beltway to the Occoquan. An analysis may be required to ascertain impact for any project not completed by 2011.</p>			
Response			
<p>Adoption of the traffic demand management program and hiring appropriate staff to manage it will be addressed in the Record of Decision. Traffic demand management issues are addressed in Section 4.3.4.4 of the EIS. Adoption of the traffic demand management program and hiring a person to manage it will be addressed in the ROD. Funding of transportation projects will also be addressed in the ROD.</p>			

Commenter	Comment #	Comment Type	Name
P12	P12.5	Private Citizen	Frank Cohn
Section	Page Number	Organization	
4.3 Transportation		Mount Vernon Council of Citizens' Associations	
Comment			
<p>5. Mass Transit Needs: The statement that currently no plans exist for Metro expansion of either the Blue or Yellow Lines should raise a red flag. Fairfax County should be requested to expedite the pending Transit Study designed to determine optimal mass transit options for the Route #1 corridor. The TDMC should furnish appropriate BRAC input and remain in close coordination with this study group. Mass transit to Fort Belvoir, along with a properly located VRE station, is deemed to be an absolutely essential component of any successful area transportation plan.</p>			
Response			
<p>Please refer to Section 4.3.3.3, in which additional information was added about a previous Metro study that looked at the feasibility of a fixed guideway system to Fort Belvoir from the Franconia-Springfield Metrorail station, and determined with an employment base of 48,000 on Main Post, the system would not be viable.</p>			

Commenter	Comment #	Comment Type	Name
P13	P13.1	Private Citizen	Robert McLaren
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>A. Environmental impacts caused by traffic due to BRAC are not correctly identified.</p> <p>(1) There is a basic underlying error in the DEIS as regards traffic. This error is that BRAC just causes a redistribution of traffic within the National Capitol Region – no new traffic is added. The DEIS points out that since the BRAC calls for the departure of some personal from the area, the overall traffic impact is improved. This is false. As personnel move out of leased facilities to Fort Belvoir, there will be no reduction in traffic to those leased facilities since new tenants will move in. This is a direct and foreseeable consequence of BRAC. As a result, the traffic impact of personal going to work at Fort Belvoir is an addition to the already existing traffic, not redistribution. All trips to Fort Belvoir caused by BRAC should therefore be considered as new traffic in the DEIS.</p>			
Response			
<p>Regional statements are being inadvertently merged with local statements in the comment. Regionally, 22,000 jobs are shifted to Fort Belvoir from elsewhere. There are not 22,000 jobs being brought in from outside the NCR, so there is no regional change to the population or number of jobs. Thus overall there is very little regional adverse effect. The comment recognizes and the EIS states that as jobs are added to Fort Belvoir, there will be significant adverse local effects.</p>			

Commenter	Comment #	Comment Type	Name
P13	P13.2	Private Citizen	Robert McLaren
Section	Page Number	Organization	
4.3 Transportation			
Comment			
(2) Furthermore, there are errors in the data presented. Table 4.3-15 shows the distribution of NGA employees. However, this is based on payroll data and therefore only includes federal employees, not embedded contractors. Embedded contractors are approximately 50% of the personnel coming to Fort Belvoir. All calculations done on the effect of the move of NGA are based on federal employees. The implicit assumption is that the embedded contractors have the same distribution as federal employees, but this is not supported in any fashion.			
Response			
No survey ever gets a 100 percent response rate. The study uses the best available data; VDOT and the County were included in the review of the survey methodology; and these agencies noted that a 100 percent response is not possible. They recognized that it is unusual to achieve much more than a 40 percent return and accepted the methodology.			

Commenter	Comment #	Comment Type	Name
P13	P13.3	Private Citizen	Robert McLaren
Section	Page Number	Organization	
4.3 Transportation			
Comment			
(3) Support contractors, not embedded, are not considered. It can be expected that some support contractors will relocate to be nearer to the agencies they are supporting, but others will elect to stay in place. The impact of these contractors is not addressed and this is a serious oversight.			
Response			
The Study Team met with representatives from Fairfax County and VDOT to develop the land use plans that should be used. Through collaboration with and agreement from both agencies, it was determined that these future contractor tails represent speculation and that the current modeling tools do not provide the information or tools to assess these types of potential land use changes. Non embedded contractors are treated as visitors and are included in the traffic assignments.			

Commenter	Comment #	Comment Type	Name
P13	P13.4	Private Citizen	Robert McLaren
Section	Page Number	Organization	
4.3 Transportation			
Comment			
(4) Table 4.3-15 shows that 45% of NGA will have to cross the Potomac to get to Fort Belvoir. While this figure is subject to debate (see A2 above) and may be much higher, this puts a significant number of new crossings over three bridges across the Potomac. This will have a significant impact on already overloaded bridges and make the existing situation worst. Yet none of these bridges are addressed in the study.			
Response			
See the table 3.4-16, which shows assumed distribution. The percentage drops to 28 percent as people move. BRAC represents less than 10 percent traffic at those locations			

Commenter	Comment #	Comment Type	Name
P13	P13.5	Private Citizen	Robert McLaren
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>(5) There is an error in one table on road intersections in Table 4.3-5 and this leads to a question about the accuracy of the others in this table and other tables. The DEIS shows the Telegraph Road/South Van Dorn Street intersection traffic condition as C in the AM and as D in the PM. This is an underestimate. At 5:00 PM, the intersection of Telegraph/South Van Dorn is always F. For example, I went through this intersection on 17 April on my way to attend the public hearing on the DEIS. I ran into traffic backed up from this intersection at 4:55 PM and did not clear the intersection until 5:00 PM. I traveled 0.4 miles in these five minutes. The backup that I encountered was much less than what I see on most days.</p>			
Response			
<p>Analyses follow the Highway Capacity Manual methodology. Additional considerations include adjacent signals that affect progression/traffic flow. It should be noted that mitigating actions are included for widening the Telegraph Road corridor (see Section 4.3.4.4).</p>			

Commenter	Comment #	Comment Type	Name
P13	P13.6	Private Citizen	Robert McLaren
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>(6) The methodology used to generate many of the tables showing traffic is not fully explained. If all this is done by modeling (such as Table 4.3-5), then the models need to be supplemented by current empirical data. The models used in traffic predictions often fail to correctly predict the actual traffic conditions. This is due to the inherent limitations of such models plus the models being applied in cases where they are not suited. Furthermore, numbers presented are precise and therefore are not realistic. All results should show a range of figures to account for uncertainties in the data used and the methodology.</p>			
Response			
<p>Analyses follow the Highway Capacity Manual methodology.</p>			

Commenter	Comment #	Comment Type	Name
P13	P13.7	Private Citizen	Robert McLaren
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>B. The measures for mitigating the admitted serious (Paragraph 4.3.4.4) traffic impacts are inadequate.</p> <p>(1) Only potential measures are shown and a comprehensive list of measures that will be done, if any, is left to the future. Since there are many uncertainties in these measures, including cost, an informed guess cannot be made as to what measures will be selected.</p>			
Response			
<p>The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD.</p>			

Commenter	Comment #	Comment Type	Name
P13	P13.8	Private Citizen	Robert McLaren
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>(2) Since the traffic impact is seriously underestimated, sufficient mitigation measures are not identified. The DEIS needs to be revised, showing a complete set of such measures. Additionally, there needs to be real measures identified and funded, not an incomplete wish list.</p>			
Response			
<p>The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD.</p>			

Commenter	Comment #	Comment Type	Name
P13	P13.9	Private Citizen	Robert McLaren
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>(3) At this time, it is highly unlikely that a complete set of mitigation measures will be in place by 2011, the date the BRAC changes will occur. Therefore, severe traffic impacts will happen and be experienced by not only those newly assigned personnel to Fort Belvoir, but also all users of the roads in eastern Fairfax County. This is unacceptable since this is a significant negative impact on the quality of life in this area of the County, plus an increase in air pollution.</p>			
Response			
<p>The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD.</p>			

Commenter	Comment #	Comment Type	Name
P13	P13.10	Private Citizen	Robert McLaren
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>(4) Rail is not considered as a mitigation measure. This is a serious mistake – rail must be considered. As mentioned in A4, there will be significant numbers of people coming across the Potomac. If NGA at the Washington Navy Yard is a good example, a significant number of NGA personnel use metro rail today, and these personnel would have to find alternative ways of getting to Fort Belvoir. This will be via an already overloaded road network. While busses can help, they are still tied down to the road network and will suffer delays due to traffic. Rail extensions, either extending today’s metro rail or by light rail, on both the Blue and Yellow lines to Fort Belvoir on Richmond Highway and to the EPG need to be put in place before 2011. Furthermore, there needs to be internal shuttles that will carry people from the new rail stations to their places of work.</p>			
Response			
<p>WMATA conducted a fixed guideway transit study to extend rail to Fort Belvoir. It considered employment levels of 48,000 at Fort Belvoir and determined that it would only sustain a maximum ridership of 9,000 daily riders, which would not be sufficient ridership to justify rail (LRT or Metro). The Army recognizes the need for additional studies. In collaboration with FHWA, these studies will be completed in accordance with the decision in the Record of Decision to accept the mitigating actions. See Section 4.3.3.3.</p>			

Commenter	Comment #	Comment Type	Name
P13	P13.11	Private Citizen	Robert McLaren
Section	Page Number	Organization	
4.2 Land Use			
Comment			
<p>C. The change in land use categories (paragraph 2.2.1.2) will reduce protection to environmentally sensitive areas.</p> <p>(1) The existing 1993 Master Land Use Plan includes a category for environmentally sensitive land (currently at 3,063 acres, which does not include EPG). The proposed new plan eliminates this category and places some of the environmentally sensitive land into a community category. However, large areas of environmentally sensitive land are placed into other categories – airfield, professional/industrial, and training. These three categories will encompass significant environmentally sensitive areas such as portions of the wildlife corridor, streams and wetlands in the southwest area, and all the streams and wetlands on the EPG.</p>			
Response			
<p>The project-siting process on Fort Belvoir evaluates both compliance with land use designations and potential other issues with sites. Areas identified as sensitive (i.e., RPAs, wetlands) still retain their regulatory protections. See the response to Comment L1.4.</p>			

Commenter	Comment #	Comment Type	Name
P13	P13.12	Private Citizen	Robert McLaren
Section	Page Number	Organization	
4.2 Land Use			
Comment			
(2) While some protections remain in place for these environmentally sensitive areas, the overall designation as such is gone. As a result, future development can be expected to encroach into these areas. This expectation of future development is illustrated by a statement in paragraph 4.6.2.1.1 "The Professional/Industrial, Community, and Residential land uses would allow development in areas that were considered Environmentally Sensitive in the 1993 land use plan, although environmental constraints (e.g., endangered species habitat) would retain their protected status and continue to limit potential development in some of these area."			
Response			
The project-siting process on Fort Belvoir evaluates both compliance with land use designations and potential other issues with sites. Areas identified as sensitive (i.e., RPAs, wetlands) still retain their regulatory protections. See the response to Comment L1.4.			

Commenter	Comment #	Comment Type	Name
P13	P13.13	Private Citizen	Robert McLaren
Section	Page Number	Organization	
4.2 Land Use			
Comment			
(3) The Environmentally Sensitive category should remain in the land use plan.			
Response			
The updated land use plan in the FEIS reclassified land use categories from the 1993 Master Plan in accordance with Army Regulation 210-20 and the Army's Master Planning Technical Manual (MPTM). In addition to regulatory protection requirements, environmentally sensitive areas remain protected by mitigations identified in environmental assessments and in the 1991 BRAC ROD.			

Commenter	Comment #	Comment Type	Name
P13	P13.14	Private Citizen	Robert McLaren
Section	Page Number	Organization	
4.2 Land Use			
Comment			
(4) The environmentally sensitive lands such as RPA and EQC should be clearly identified in the EIS. Furthermore, all streams on the EPG need to be surveyed to see if they are perennial streams and therefore have RPAs associated with them. The experience in Fairfax County is that the number of perennial streams was underestimated until a detailed survey was done using an approved protocol. (Prior to this, designation as a perennial stream was based upon mapping by the U. S. Geological Survey – said mapping acknowledged to be full of errors.) This added a significant amount of new RPA to lands in Fairfax County and I would expect the same at EPG. I do know of one tributary in the northwest portion of the EPG that is a perennial stream and therefore deserving of protection. This stream was not identified as EQC because of policies in the early 1990's. These policies have been updated and this tributary would likely now qualify as having EQC, and would certainly have an RPA. In order to ensure protection of all RPAs, the EPG should have their mapping of streams updated by an on-site survey with approved protocols (such as developed by Fairfax County).			
Response			
Mapping of streams and wetlands in areas that could be affected by BRAC actions were performed for this EIS. Detailed environmental constraints can be found in Appendix J.			

Commenter	Comment #	Comment Type	Name
P13	P13.15	Private Citizen	Robert McLaren
Section	Page Number	Organization	
4.2 Land Use			
Comment			
(5) In addition to EQCs and RPAs, all environmentally sensitive areas need to be clearly identified in the EIS. At present, such detail is missing.			
Response			
All environmental constraints are now clearly marked on figures in Appendix J.			

Commenter	Comment #	Comment Type	Name
P13	P13.16	Private Citizen	Robert McLaren
Section	Page Number	Organization	
4.2 Land Use			
Comment			
(6) There needs to be a clear commitment to protecting all environmentally sensitive areas. Development should not be allowed in these areas, now or in the future.			
Response			
The project-siting process on Fort Belvoir evaluates both compliance with land use designations and potential other issues with sites. Areas identified as sensitive (i.e., RPAs, wetlands) still retain their regulatory protections. See the response to Comment L1.4.			

Commenter	Comment #	Comment Type	Name
P13	P13.17	Private Citizen	Robert McLaren
Section	Page Number	Organization	
4.7 Water Resources			
Comment			
D. Construction because of BRAC will have significant impact on streams.			
(1) A number of subwatersheds will experience over a 10% increase in 1- and 10-year storm event peak discharge (Table 4.7-7). These increases range up to 100% and will have serious impact on the quality of water in the streams. Furthermore, these increases can be even greater since experience in storm events has shown that models can, and do, under predict peak discharges.			
Response			
As referenced in the introduction to Section 4.7.2, BMPs and other stormwater management practices were not included in the effects analysis because of the need to identify final siting of proposed projects before stormwater management planning. Therefore, the analysis presents peak flow and pollutant loading results that will be substantially reduced through by implementing of effective stormwater management practices and mitigation efforts in compliance with all applicable federal, state, and local stormwater requirements. These future stormwater planning efforts were considered during the assessment of potential effects. As stated in the response to Comment L15.3, BMPs would be incorporated as discussed in Section 4.7. Proposed mitigation plans are appropriate within the scope of the EIS. The Army would comply with all relevant and applicable federal, state, and local requirements to help ensure the Army's proper stewardship of its resources. The analysis shown in the DEIS was conducted as a worst-case scenario on the basis of the best available planning and design information without any stormwater plans included. The Army will provide appropriate stormwater protection and management, in accordance with state and local requirements, which will minimize the potential impacts described in the DEIS. Stormwater management and appropriate practices will be considered at a later stage.			

Commenter	Comment #	Comment Type	Name
P13	P13.18	Private Citizen	Robert McLaren
Section	Page Number	Organization	
4.7 Water Resources			
Comment			
(2) The EIS does not address any impact on streams other than peak discharges. Due to the increase in impervious surface, many subwatersheds will experience an increase in total volume of water, thereby increasing erosion. Both peak discharges and total volume of water from storm events must be considered and treated.			
Response			
Stormwater effects and potential changes in pollutant loadings are discussed throughout Section 4.7. Potential increases in flow volume were calculated at the watershed scale and are presented in the Cumulative Impacts section. Peak flow is the primary concern at the subwatershed scale.			

Commenter	Comment #	Comment Type	Name
P13	P13.19	Private Citizen	Robert McLaren
Section	Page Number	Organization	
4.7 Water Resources			
Comment			
(3) A good list of mitigation measures is proposed (paragraph 4.7.2.4); however, there is no commitment to some of these. The language that some of the measures “could be included” needs to be changed to “will be included.” These include LID management practices, man-made wetlands, restored riparian buffers, stream restoration projects, and participating in Fairfax County’s Watershed Planning Process. A complete set of adequate mitigation measures needs to be identified and funded. I would also suggest a commitment to keeping storm water runoff to that of a forested condition. This commitment will help guide the selection of mitigation measures.			

Response
As stated in the response to Comment L15.3, BMPs would be incorporated as discussed in Section 4.7. Proposed mitigation plans are appropriate within the scope of the EIS. Identification of funding sources is not available. The Army would comply with all relevant and applicable federal, state, and local requirements to help ensure the Army’s proper stewardship of its resources.

Commenter	Comment #	Comment Type	Name
P13	P13.20	Private Citizen	Robert McLaren
Section	Page Number	Organization	
4.7 Water Resources			
Comment			
E. Additional mitigation measures can be done both within and outside of the areas affected by BRAC. (1) Stream restoration and riparian buffer restoration should be done at Davidson Airfield. This can help mitigate the impacts of BRAC on Accotink Creek.			

Response
As stated in the response to Comment L15.3, proposed mitigation plans are appropriate within the scope of the EIS. The Army would comply with all relevant and applicable federal, state, and local requirements to help ensure the Army’s proper stewardship of its resources.

Commenter	Comment #	Comment Type	Name
P13	P13.21	Private Citizen	Robert McLaren
Section	Page Number	Organization	
4.8 Biological Resources			
Comment			
(2) Reforestation should be done on selected areas within Fort Belvoir. This would help replace some of the trees that BRAC construction removes. One such area would be those portions of the EPG that are being grubbed to remove UXO. Where possible, oak and mixed oak hardwoods should be considered for upland areas. Such replantings that would help regenerate a mixed oak forest would have long-term benefits to water quality, air quality, and animal life that depends upon acorns from oaks as a food source.			

Response
Thank you for the comment. No change was made to the document.

Commenter	Comment #	Comment Type	Name
P13	P13.22	Private Citizen	Robert McLaren
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
F. Air quality impacts due to BRAC are not correctly identified. (1) Air quality impacts due to the increase in traffic are ignored. As mentioned in A1 above, the traffic to Fort Belvoir as a result of BRAC is essentially new traffic. However, the DEIS ignores this and states that there is an overall improvement to air quality because of BRAC. This is false and is a serious flaw in the DEIS.			

Response
Information on mobile sources of air emissions appear in Section 4.4.2.2.2 and Appendix E.1 Sections 3.1.1.2 and 3.1.3.2. Issues relating to ozone and PM2.5 were addressed.

Commenter	Comment #	Comment Type	Name
P13	P13.23	Private Citizen	Robert McLaren
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
(2) The EIS does not take into consideration or include an analysis of the increased production of ground-level ozone (smog) or particulate matter (PM2.5) that will result from the significant increase in traffic that will be coming to Fort Belvoir. An ozone and PM2.5 hot spot analysis should be included as part of the EIS to determine what impacts, if any, each alternative would have on local ground-level ozone and PM2.5 concentrations.			
Response			
Information on mobile sources of air emissions appear in Section 4.4.2.2.2 and Appendix E.1 Sections 3.1.1.2 and 3.1.3.2. Issues relating to ozone and PM2.5 were addressed. Additional text was included in the EIS to clarify the criteria used to determine need (or lack thereof) for a PM2.5 or ozone hot spot analysis or modeling.			

Commenter	Comment #	Comment Type	Name
P13	P13.24	Private Citizen	Robert McLaren
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
(3) All air quality models and analyses done for the EIS should be fully explained.			
Response			
Detailed modeling inputs and procedures appear in Appendix E of the EIS.			

Commenter	Comment #	Comment Type	Name
P14	P14.1	Private Citizen	Dale Denda
Section	Page Number	Organization	
Other			
Comment			
<p>The issues raised at the public hearing concerning the impact of the Fort Belvoir expansion are very valid, particularly concerning traffic access/congestion mitigation. It is clear major changes in the program are very much of a possibility, but I trust the plan for the Museum of the US Army will continue to fruition. Pending final funding, the place-holder status that this particular project enjoys in the master plan is a very significant, if relatively small, element of the larger program.</p> <p>The importance of this long-overdue tribute to our army through exhibits and other factual evidence cannot be overestimated. The full story of how our armed forces fit into the fabric of history of this country has not been fully presented. In fact, the U.S. Army has a singularly important position in that history due to the continuity of the institution which predates the republic itself. This fact should justify the project in and of itself.</p> <p>Such a facility will also provide a fine venue for veterans to visit and be honored, at the same time giving them an opportunity to share their stories which artifacts will no doubt evoke. We can only hope that the museum will be given an appropriate media profile so that its existence, unlike the current proposal, does not remain virtually anonymous.</p>			
Response			
Comment noted. The Army shares the commentator's sentiments concerning the propriety and value of having a National Museum of the U.S. Army. In the context of the EIS, the museum is evaluated as a contributor to cumulative impacts.			

Commenter	Comment #	Comment Type	Name
P15	P15.1	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>2. We think mass transit was not given adequate attention in the DEIS by assessing only bus options. From our experience, buses don't attract professional employees in significant numbers as compared to rail. The EIS should talk bus versus rail ridership. The light rail concept figure below (or something similar) should be assessed in the EIS. The reuse of existing Government-owned railroad right-of-way extends to the CSX main line that connects to the Franconia-Springfield Metro/VRE station. The concept is approximately 6.5 mile long. It connects Metro & VRE to the proposed Army Mueum as well as several Ft Belvoir loccations which are convenient to work places. Request the EIS access ridership rates (bus versus rail), corresponding road traffic congestion, air quality improvements associated with various levels of ridership for each alternative, and if transportation mitigation projects can be avoided/simplified. The EIS should also discuss how a higher density of workers (Town Center Alternative) improves the viability of mass transit. Personnel screening could be located in the "Gateway" Station to address security concerns. People wishing to visit the Army Museum would get a visitors pass that would only enable them to exit at the DLA/Museum Station.</p>			
Response			
<p>WMATA conducted a fixed guideway transit study to extend rail to Ft Belvoir. It considered employment levels of 48,000, which is higher than a post-BRAC implemented population, at Ft Belvoir and determined that it would only sustain a maximum ridership of 9,000 daily riders, which would not be sufficient ridership to meet the criteria to justify rail (LRT or Metro). The Army recognizes the need for additional studies. Section 4.3.4.4 discusses running shuttle buses from the Metrorail Station to Fort Belvoir. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. Funding of transportation projects will also be addressed in the ROD.</p>			

Commenter	Comment #	Comment Type	Name
P15	P15.2	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
Other			
Comment			
<p>3. Our preference is with the Town Center Alternative for the following reasons:</p> <ul style="list-style-type: none"> - Concentrates base function to make mass transit feasible, making it the best case for its success on Ft Belvoir on Ft Belvoir <ul style="list-style-type: none"> o Reduces traffic congestion and improves air quality o Improves connectivity to Pentagon o Leadership in Energy and Environmental Design (LEED) point - Sustainable Credit 4.1 o Reduces America's dependence on foreign oil - Less costly over long term <ul style="list-style-type: none"> o Fewer security check points than the Preferred Alternative (saves money) o Fewer emergency service stations than the Preferred Alternative (saves money) o Potential to use central energy plants to provide chilled & hot water, steam and emergency power (higher efficiency -potential privatization) o Less travel time lost for maintenance workers going to EPG or GSA o Less travel time lost for workers going to main post for support services - Takes advantage of existing infrastructure investments o Utilities o Emergency services o Post support services (retail, legal, medical, recreation, fitness, housing barracks, etc). o Potential for increased AAFES sales to off-set loss of MWR profits due to loss of golf courses o Reutilizes previously developed land LEED point - Sustainable Credit 3 - Less impact on the environment <ul style="list-style-type: none"> o Biological resources o Cultural resources o Water resources (Potomac and Chesapeake Bay) - Consider Enhanced Use Lease (EUL) to construct a Transportation Center on Ft Belvoir <ul style="list-style-type: none"> o Third party financing, it wouldn't cost the Army or BRAC accounts the cost of this facility o It could serve as a transportation center for public transit and security screening to the Post o It could provide Government contractor leased space, conferencing spaces, hotel, retail space, doctor offices for civilians, childcare (instead of using BRAC dollars), and a physical fitness center for civilians, etc. o A user fee included in public transit fares and rental of commercial space could help the developer recover their initial investment - Ties into the Planning Principles (pg 2-2): <ul style="list-style-type: none"> o Transportation Center would transform the post into "world-class" installation o Transportation Center would achieve a diversity of use and activities o The Town Center Alternative strengthens the natural habitat - is the best alternative at protecting the natural habitat o The Town Center Alternative is the most compact neighborhood of all the alternatives! o Transportation Center could be used to meet the "improved connectivity planning principle" to "park once" - parking garages could also be EUL facilities o The Town Center Alternative creates the most walk able neighborhood o The Town Center Alternative can respect Ft Belvoir history o The Town Cmter Alternative and Transportation Center can foster community benefit by bringing the best the private sector has to offer with a patriotic dedicated workforce 			
Response			
<p>The Army will announce in its Record of Decision which land use plan and alternative for implementing BRAC best serves the Army's needs, to include a wide range of considerations such as mission accomplishment, traffic, force protection, accessibility, cost, technical feasibility, and environmental impacts. Each of the alternatives has certain strengths, as well as drawbacks. To date, the Preferred Alternative has been that presented in Section 2.0.</p>			

Commenter	Comment #	Comment Type	Name
P15	P15.3	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
Other			
Comment			
- Replace existing fence on north side & pickup of construction debris along fence line weekly			
Response			
The fence line is slated to be replaced under Project 8 as described in Section 2.2.2.3 in the EIS.			

Commenter	Comment #	Comment Type	Name
P15	P15.4	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
4.5 Noise			
Comment			
- BRAC construction to be at least 400-800 feet from existing homes or noise attenuation			
- Placement of mechanical/energy plant systems to be located as far away as possible from residences, and be of a low noise variety with sound attenuating systems if noise levels exceed 65db measured at closest residence			
- Limit construction activity (noise) on EPG Monday to Friday with work hours not to exceed 0600-1800 hours			
Response			
The location of the new facilities related infrastructure and their construction is driven by site conditions and force protection measures as well as various other issues including noise. To the extent practicable noise impacts will be incorporated into the siting of the new facilities. The Army would implement BMPs outlined in the EIS. The Army would limit construction to predominately occur during normal weekday business hours in areas adjacent to noise-sensitive land uses such as residential areas, recreational areas, and off-post areas. Information on matters outlined in the comment appear in Section 4.5.2.3.			

Commenter	Comment #	Comment Type	Name
P15	P15.5	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
4.8 Biological Resources			
Comment			
- Leave in place the existing natural hardwood buffer zone between fence and the notional circular road enclosing the proposed EPG users (WHS & NGA)			
- BRAC construction to be of low and medium height facilities not to exceed 5 stories (ref Section 4.2.1.2.3, pg 4-4) above grade such that they cannot be seen through the natural buffer zone			
Response			
Vegetative buffers will be retained on EPG to the extent practicable. Facility design will also incorporate aesthetic considerations to the extent practicable.			

Commenter	Comment #	Comment Type	Name
P15	P15.6	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
4.3 Transportation			
Comment			
- Construction traffic - improve roads first (Backlick and Fairfax County Parkway) before arriving BRAC employees! Hundreds of thousands of construction trucks/workers will choke existing roads. Some of these road improvements will need to occur during non-standard hours			
- Extend Metro or light rail to EPG - shuttle buses to Franconia-Springfield Metro station will likely be stuck in traffic and therefore will not attract sufficient riders to measurably reduce traffic congestion			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. A transportation management plan will be put in place for construction activities.			

Commenter	Comment #	Comment Type	Name
P15	P15.7	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
4.8 Biological Resources			
Comment			
- Capture (to relocate) native large mammals (deer and fox) to avoid forcing them into surrounding neighborhoods that don't have sufficient resources to provide a proper habitat			
Response			
Fort Belvoir will use its INRMP as a guide for minimizing the effects of facility construction on fauna.			

Commenter	Comment #	Comment Type	Name
P15	P15.8	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
4.3 Transportation			
Comment			
- Oppose the creation of Neuman Street Gate <ul style="list-style-type: none"> o Neighborhoods to the north of EPG have only one way in and out @ Bonniemill Lane/Spring Valley Drive. It is already a major battle neck for ingress and egress o This gate would force residents to compete with thousands of EPG employees to get on Springfield-Franconia Parkway o The mitigating road improvements would increase travel time (reduces response time) for emergency services (Fire and Rescue services from the Springfield Volunteer Fire Department) on Backlick Rd to neighborhoods north of EPG 			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. An interchange on Franconia-Springfield Parkway at Neuman Street would perform better than an at-grade intersection.			

Commenter	Comment #	Comment Type	Name
P15	P15.9	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
Other			
Comment			
Issues of concern with the Preferred Alternative: <ul style="list-style-type: none"> - Pg ES-10, the Preferred Alternative disturbs more acreage than all but one alternative @ 353, Satellite Campuses @ 471, City Center @ 298, and Town Center @ 330. How is impacting more acreage better than less acreage? - Pg 4-281, Table 4.8-1 1, the Preferred Alternative show the greatest potential effects (in acres) on natural resources of all the alternatives, the Town Center the least impact. - Pg ES-11, the Preferred Alternative has "The greatest potential expected increases in total nitrogen and total phosphorous pollutant loading to surface waters...with five watersheds expected to increase their loads by more than 10 percent." - Pg ES-11, "The City Center Alternative would have the greatest adverse effect on the biological resources of Ft Belvoir, followed by the Preferred Alternative." The Town Center has the least impact of the alternatives. - Pg ES-12, "The simple tally of the number of proposed projects" affecting cultural resources is not favorable to the Preferred Alternative. - Pg ES-13, the City Center alternative has the least impact than the other 3 alternatives with respect to aesthetics and visual resources. 			
Response			
The Army notes the summary of issues of concern regarding the Preferred Alternative. These matters will be weighed in arriving at a decision in the Record of Decision.			

Commenter	Comment #	Comment Type	Name
P15	P15.10	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
DOPAA			
Comment			
- Pg 2-20, Table 2-4. What is an "overwatch booth"? Are these similar to a prison watch tower? Watch towers exceeding tree height are unacceptable if seen from area neighborhoods.			
Response			
An overwatch booth is a supervisory position that provides back-up to first-line activities such as identification checking or vehicle inspection. Overwatch booths are not tall structures.			

Commenter	Comment #	Comment Type	Name
P15	P15.11	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>- Pg 4-76 bottom of page (Section 4.3.4.2.1), this section understates the impact to EPG proper as it combines it with the main post. The analysis of EPG (see pg 4-83) which receives 80% of the BRAC workers with limited ways to access the site: Backlick Rd, Newington, Fairfax County Pkwy (7100 not yet built), Springfield-Franconia Pkwy @ Newman St (a recommended transportation mitigation initiative). The 4 or so access points makes each (on average) busier than Tully Gate (Table 4.3-6) from 0600-0900 time frame with the 18,000 workers are expected to work. Suggest making EPG parking outside the security fence to simplify the screening process to just personnel and handbags similar to the Pentagon. The new campus should be friendly to walking.</p> <p>--Section 4.3.4.2.1, glaring oversight not to address how the BRAC workers currently get to work.</p> <p>- Section 4.3.4.2.1, glaring oversight not to address how any DoD shuttle bus(es) that would be required to shuttle employees between Ft Belvoir, EPG, GSA, Franconia-Springfield Metro or the Pentagon.</p> <p>- Pg 4-85, Transit Center/Facilities, the brief description is vague. What is the concept? Would it be located on EPG or main post or both? How is this different from the Rideshare Facility?</p> <p>- Pg 4-87, Transit System. Concern with bus travel is that unless dedicated bus or HOV lanes are provided, they'll be caught up in the congestion too. Need to provide a public transit alternative that is faster than SOV. Without saving time, it'll be difficult to get workers to ride a bus to get to work.</p> <p>- Table 4.3-22, Mitigation Measure #12. How does adding access to EPG off of Neuman Street improve the level of service on the Springfield-Franconia Parkway (Route 7900)? If the LOS for mitigation measure #11 got to C or better, adding high volume (4 lane Neuman St) would reduce the LOS on Route 7900 and not "reduce volume on Parkway by 500 vph" Need to clearly explain how adding 500 vph improves the LOS on Route 7900.</p>			
Response			
Six access points are currently being developed for EPG, and the security concept that is being adopted is that no access control points are being considered (see Section 4.3.8.2 for revised text). The Study is limited to the effect of the proposed BRAC action at Fort Belvoir on the road system. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD. In reference to mitigation measure 12, it will only be adopted if mitigation measure 11 is adopted as well. There would be a 400 vph diversion from Fairfax County Parkway to Franconia-Springfield Parkway and Neuman Street if these mitigation measures were to be implemented. The proposed interchange at Neuman Street would perform better than the current at-grade Bonniemill intersection.			

Commenter	Comment #	Comment Type	Name
P15	P15.12	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
4.7 Water Resources			
Comment			
- Pg 4-231, Table 4.7-10. The Preferred Alternative affects more RPAs @ 13.7 acres than Town Center Alternative @ 7.4 acres (pg 4-240). How is impacting more RPAs better?			
Response			
The identification of a Preferred Alternative is based on detailed analysis of multiple factors taken as a whole, not only effects to RPAs.			

Commenter	Comment #	Comment Type	Name
P15	P15.13	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
4.8 Biological Resources			
Comment			
<p>- Pg 4-266, Section 4.8.1.5.4. Development on EPG threatens the Small Whorled Pogonia, the only known location in Fairfax County. How will the Remote Inspection Facility identified on pg 2-13 affect the Small Whorled Pogonia?</p> <p>- Pg 4-270&271, Section 4.8.2.3.2. Need to protect PIF habitat on EPG and main post.</p> <p>- Find an alternative location for the family travel camp project where campers will not come in contact with wood turtle habitat (we all know what kids do to turtles), and is not within an occasional-use foraging area for bald eagles.</p>			
Response			
Thank you for the comment. Effects on the SWP are addressed in Section 4.8.2.3.			

Commenter	Comment #	Comment Type	Name
P15	P15.14	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>- Did not assess the existing transportation methods used by current workers. WHS currently can use the Metro Yellow or Blue lines. Do the users make a significant percentage of the workers? Is it reasonable to assume if there were a mass transit option, that they'd continue to commute via mass transit? The Preferred Alternative without adequate mass transit appeal would likely have a net increase in air emissions and traffic congestion if the former mass transit commuters have to drive to Ft Belvoir due to the inadequate level of mass transit.</p>			
Response			
Comment noted. However, it is noted in the mitigation sections for each alternative in this land use EIS that transit is a mitigating action. The Record of Decision will indicate whether transit services will be adopted as part of the mitigating actions. Funding will also be addressed in the ROD.			

Commenter	Comment #	Comment Type	Name
P15	P15.15	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
Other			
Comment			
<p>- If the hospital were to be constructed at EPG under the City Center Alternative, wouldn't there have to be a troop medical clinic on the main post? To not have an out patient clinic on main post would require active duty personnel to travel to EPG for routine care which would increase lost duty time.</p>			
Response			
Fort Belvoir has identified a need for a troop clinic on Main Post if the new hospital is located at the EPG. That facility's project (Project Number 64242, Family/Troop Medical Clinic) will be activated and funding sought if required.			

Commenter	Comment #	Comment Type	Name
P15	P15.16	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>- Tables 4.3-19 and 4.3-30 display Productions & Attractions for the Preferred and City Center Alternatives. Looking at EPG how is it that the production and attraction numbers are less under the Preferred Alternative when there are 17,763 employees verses 11,705 employees under the City Center Alternative (a 50% population increase, but 11% fewer events)?</p>			
Response			
The tables and figures have been corrected. The tables should have stated EPG and GSA.			

Commenter	Comment #	Comment Type	Name
P15	P15.17	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
- Pg ES-9. On pg 4-161 (Section 4.4.4.3) the City Center Alternative states that "Under NSR permitting requirements, NOx emission offset at a ratio of 1:1.15 would have to be located and obtained for all stationary sources cited on EPG." If this is true statement, then all alternatives including the Preferred Alternative will require such a permit! Pg 4-157 (Section 4.4.2.3) fails to list this as a BMPs/Mitigation.			
Response			
Information available to the Army has been verified as accurate. A New Source Review permit is not required under any of the alternatives except the City Center Alternative because the potential to emit NOx will not exceed 100 tons/year.			

Commenter	Comment #	Comment Type	Name
P15	P15.18	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
Other			
Comment			
- Pg ES-14 & 2.2.2.3 pgs 2-19 to 2-21, the Preferred Alternative talks to the EPG upgrade utility expenses, but fails to discuss the "construction cost avoidance" of not having to build utilities (Project numbers 64097, 67487, 67959) associated with the Town Center & Satellite Campuses alternatives. Project number 64076 (Emergency Services Center) is also not required under the Town Center and Satellite Campuses Alternatives. Project number 65447 (USANCA Support Facility) would not be needed if EPG is not developed (Preferred Alternative or City Center Alternatives). Are there other projects not shown in the alternatives that would offset the savings? The projects for each alternative should represent what's truly required to support the requirements including ancillary and utility projects.			
Response			
The Army recognizes that each of the BRAC implementation alternatives presents various advantages in matters such as cost, potential environmental effects, mission supportability, and schedule implications. All the alternatives would involve additional utilities support of varying magnitude and cost.			

Commenter	Comment #	Comment Type	Name
P15	P15.19	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
4.13 Hazardous Waste			
Comment			
- Pg ES-15 (ES.6.12), wouldn't UXO cost @ EPG be approximately the same for City Center @ EPG? Less for Town Center and Satellite Campuses? Clarify what is and isn't required when it comes to UXO and environmental remediation.			
Response			
Town Center and Satellite Campus Alternatives also include UXO areas with substantial costs. Each site and case is unique. It is not possible to answer this completely in this format.			

Commenter	Comment #	Comment Type	Name
P15	P15.20	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
4.8 Biological Resources			
Comment			
- Pg 2-13 Fig 2-5 shows a "Remote Inspection Facility" (RIF), however there is no project number on Pg 2-14 (Table 2-3) for this project. Was the impact of the RIF assessed? Being on the west side of Accotink Creek places this in the area of the Small Whorled Pogonia (pg 4-266, Section 4.8.1.5.4) "the only location in Fairfax County where this rare specie has been found." Clarify and assess.			
Response			
See the response to Comment L5.107. The RIF was evaluated as part of Project 1 (NGA Administrative Facility). Section 4.8.2.2, Biological Resources, assessed the effects of BRAC on the small whorled pogonia.			

Commenter	Comment #	Comment Type	Name
P15	P15.21	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
Other			
Comment			
- Pg 4-24 Table 4.2-4, under the City Center Alternative; the hospital population moves to EPG. Would the existing Dewitt Hospital staff move to the new hospital as well? Would this increase the population shift to EPG and decrease the net increase to main post?			
Response			
Dewitt Community Army Hospital personnel would relocate to the EPG under the City Center Alternative. The future use of the present hospital facility has not been determined. If it were reused, the population decrease at Main Post would be smaller. Because any type of reuse is unknown, the amount of the Main Post population decrease cannot be estimated.			

Commenter	Comment #	Comment Type	Name
P15	P15.22	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
4.3 Transportation			
Comment			
- Pg 4-55 Section 4.3.2.5 assumes that after BRAC is implemented that a generation rate of 18 inbound trips per 100 people results. This assumption appears flawed. It would be lower once all the BRAC workers arrive.			
Response			
This section documents only existing conditions.			

Commenter	Comment #	Comment Type	Name
P15	P15.23	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
4.3 Transportation			
Comment			
- Pg 4-63 Section 4.3.3.3, there is no discussion of when a public transit system (Metro or light rail) becomes economically feasible. Does a population mass of 18,000 or 30,000 make it feasible? Was Metro's planning board contacted about collaboration?			
Response			
See response to Comment P15.1.			

Commenter	Comment #	Comment Type	Name
P15	P15.24	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
4.3 Transportation			
Comment			
- Pg 4-72 Section 4.3.4.2 Preferred Alternative, the second sentence should have included EPG as in "... Section 4.3.3, would worsen traffic conditions in the immediate vicinity of Fort Belvoir and EPG." Under the Preferred Alternative, 18,000 of the 23,000 (greater than 80%) BRAC personnel are located @ EPG with a road network ill equipped to handle this volume.			
Response			
Comment noted.			

Commenter	Comment #	Comment Type	Name
P15	P15.25	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
4.3 Transportation			
Comment			
- Pg 4-75 Section 4.3.4.2.1 discusses the time frame for a residential location shift. It states that "For 2011 it was 50 percent of both NGA and WHS employees would adhere to their existing distribution and the remaining 50% mimic the distribution of Fort Belvoir's existing employees." What is the basis of this assumption? An alternative assumption is that employees starting work post BRAC would mimic Ft Belvoir's distribution, but employee's in place prior to BRAC will stay in place the rest of their working life, if they don't look for a Federal job closer to their residence. How sensitive is the analysis to the assumption?			
Response			
The study team worked with VDOT and the county to develop the distribution used for the analysis. There are many distributions that could have been done, many permutations would all have the same effect around Fort Belvoir road improvements would still be needed.			
The Study Team worked with VDOT and Fairfax County to determine an appropriate percent shift. There are many distributions that could have been done and many permutations would all have the same impact around Fort Belvoir - road improvements would still be needed.			

Commenter	Comment #	Comment Type	Name
P15	P15.26	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
4.3 Transportation			
Comment			
- Pg 4-100, last sentence of Section 4.3.5.2.2. Delete the reference to "EPG". The Town Center alternative does not involve EPG, therefore an increased use of public transit would not remove traffic from EPG.			
Response			
The reference to EPG was deleted.			

Commenter	Comment #	Comment Type	Name
P15	P15.27	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
4.3 Transportation			
Comment			
- Pg 4-104, last paragraph on page, (Section 4.3.5.4). Explain why the cost of transit-related mitigation actions is less under the Town Center alternative (og 4-89) than the Preferred Alternative (both require the same number of buses) yet the Preferred Alternative goes to more locations?			
Response			
The Preferred Alternative costs more because it serves more locations, which increases the driving cost.			

Commenter	Comment #	Comment Type	Name
P15	P15.28	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
4.3 Transportation			
Comment			
- Pg 4-105 Table 4.3-28, why is the "Before" column different than the "Before" column in Table 4.3-22? All four tables under the "Before" should be the same as they represent the LOS before BRAC.			
Response			
The purpose of this table is to assess the conditions before and after mitigations are included for each alternative. It does not refer to conditions pre-BRAC, but rather conditions when the alternative is implemented.			

Commenter	Comment #	Comment Type	Name
P15	P15.29	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
4.3 Transportation			
Comment			
Pg 4- 108, Section 4.3.6.2.1, first sentence below Table 4.3-30. Why is EPG; being grouped with Main Post? It is just as geographically separated as GSA and should be displayed as a separate site. Therefore the EPG site would show a huge percentage growth!			
Response			
In assessing the percentage of population and employment to Fort Belvoir, Main Post, EPG, and GSA are calculated together. No growth is discussed in the sentence. However, if the sites were split individually, Main Post growth would be zero as there are no workforce increases on the Main Post under the City Center Alternative.			

Commenter	Comment #	Comment Type	Name
P15	P15.30	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
4.3 Transportation			
Comment			
- Pg 4-136, Section 4.3.9, third paragraph. The placing of all BRAC-related development within the Main Post also presents a synergy of mass - that makes public mass transit feasible! This would reduce overall congestion, speed access to and from work, and improve employee recruiting & retention efforts. The continued dependence on the automobile burning fossil fuel is not sustainable. President Bush admits America is addicted to oil, and therefore the Army should lead the way to encourage alternatives to the automobile. This BRAC action is large enough in scope to assess the potential environmental impacts of providing such a transit system. The workforce at Ft Belvoir would be larger than the Pentagon, and would fill largely empty rail cars on the Metro Blue and/or Yellow lines.			
Response			
See response to Comment P15.1.			

Commenter	Comment #	Comment Type	Name
P15	P15.31	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
Pg 4-157 Section 4.4.2.3, Mitigation. If this section is correct that no mitigation measures are needed at EPG for a new site (see Pg 4-150, Section 4.4.1 referencing EPG and the GSA Parcel), then Pg 4-161, Section 4.4.4.3 is wrong. If EPG development under the City Center Alternative would require NNSR permitting requirements and NOx emission offsets, then the Preferred Alternative also would require the NOx emission offsets. Development under the Preferred Alternative is more extensive than under the City Center Alternative.			
Response			
Information available to the Army has been verified as accurate. A New Source Review permit is not required under any of the alternatives except the City Center Alternative because the potential to emit NOx will not exceed 100 tons/year.			

Commenter	Comment #	Comment Type	Name
P15	P15.32	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
4.5 Noise			
Comment			
Pg 4-171 Section 4.5.2.2.1, Construction Noise. Temporary noise is NOT 4 years, but measured on the scale of days, weeks or several months. Neighborhoods north of EPG would have to live with construction starting in late 2007 through 2011 or beyond to complete everything associated with BRAC including mitigation!			
Response			
Although the construction would last for about four years, the noise would not be permanent. Noise effects due to construction would end after the period of construction. The Army would implement BMPs outlined in the EIS.			

Commenter	Comment #	Comment Type	Name
P15	P15.33	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
4.9 Cultural Resources			
Comment			
- Pg 4-316, Table 4.9-10. The potential effects for EPG under the Town Center and Satellite Campuses are mislabeled as "Same as Preferred" when in fact they are "No Effect" (ref Sections 4.9.3.1.1 & 4.9.5.1.1)			
Response			
The purpose of Table 4.9-10 is to compare the alternatives against the Preferred Alternative. The "no effect" to properties from changes in land use at the EPG is accurate for the Preferred Alternative and the other three alternatives, thus the table has "Same as Preferred" in those slots. No change was made to the text.			

Commenter	Comment #	Comment Type	Name
P15	P15.34	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
4.10 Socioeconomics			
Comment			
- Pg 4-319, Section 4.10.1. Concerning the Region of Influence (ROI), why doesn't the ROI go beyond the listing communities given the vital importance and high use of the Interstate I-95 corridor (especially long distance trucking)? I-95 is a central transportation artery of the entire East Coast. With predicted traffic congestion discussed in Section 4.3, the transport of goods and services using I-95 will be caught up and delayed this affecting the flow of goods and services beyond the described ROI. This will affect the cost of shipping, and business productivity well beyond the stated ROI. Considering the congestion of the next best North-South alternative, I-81, they just aren't good options to business. The socioeconomic costs need to be described and assessed.			
Response			
The matter raised in the comment exceeds the scope of the EIS as determined by the Army. Calculating the trucking industry transportation costs in the I-95 corridor is outside the scope of the EIS.			

Commenter	Comment #	Comment Type	Name
P15	P15.35	Private Citizen	David and Jo-Anne Clark
Section	Page Number	Organization	
4.12 Utilities	4.12.4.1.2, page 4-403		
Comment			
- Section 4.12 on Utilities (water, sanitary, gas) did not adequately address if the existing service mains around EPG have sufficient capacity to support the alternatives without being upgraded (seemingly only electrical was described in sufficient detail to know that substation expansion will be required). The EPG analysis was less specific than the one on Fort Belvoir. The environmental impacts of the expansion efforts need to be assessed, as well as impact of the failure of not expanding on area utility consumers.			
Response			
On the basis of the feedback received from Fairfax Water and Fairfax County, existing service mains for potable water and sanitary sewers around EPG site have sufficient capacity to provide the additional level of service required due to the proposed BRAC action. The following paragraph has been added to the end of Section 4.12.4.1.2: "Minor short-term adverse effects would occur due to construction activities to achieve the extent of upgrades necessary for the water, sanitary sewer and natural gas systems in the vicinity of the EPG and GSA warehouse sites. Any improvements to the existing capacities of the above utility services should also consider the effect of the BRAC action on local area utility customers."			

Commenter	Comment #	Comment Type	Name
P16	P16.1	Private Citizen	Gerald Lyons
Section	Page Number	Organization	
4.8 Biological Resources		Communities of Mason Neck	
Comment			
ES-6 EIS states: 'Similarly, the Satellite Campuses Alternative would be expected to result in the greatest disturbance to Chesapeake Bay RPAs (40 acres) and floodplain (3 acres), as compared with 14 acres of disturbed RPAs and 3 acres disturbed floodplain under the Preferred and City Center Alternatives, and 18 acres of disturbed RPAs and no disturbed floodplain under the Town Center Alternative.'			
It is our understanding that RPAs may not be disturbed to any degree by any entity. Is the US Army exempt from state laws, in such that 14 acres may be disturbed? In our opinion, no RPA land should be eligible for disturbance.			
Response			
The Chesapeake Bay Preservation Act permits construction of road and utility corridors within RPAs. Text added to Section 4.8.2.4.2 to clarify that the RPA disturbance would be limited to these corridors.			

Commenter	Comment #	Comment Type	Name
P16	P16.2	Private Citizen	Gerald Lyons
Section	Page Number	Organization	
4.3 Transportation		Communities of Mason Neck	
Comment			
ES-6 EIS states: 'Increases in localized traffic near the installation, however, would result in minor increase in traffic congestion and subsequent long-term minor increases in localized carbon monoxide concentrations at nearby intersections.'			
This is stretching our experienced reality to a considerable degree. The transportation analysts need to "ground truth" the traffic assumptions by traveling from Woodlawn (Fort Belvoir) to the Fairfax County Parkway, or even the reverse of that during the hours, of 3:00PM to 6:00PM. Morning traffic is notably worse now than it was merely a year ago, and many of us on Mason Neck leave at 6:00 am.			
Response			
Improvements to Route 1 have been identified as part of the mitigation. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.			

Commenter	Comment #	Comment Type	Name
P16	P16.3	Private Citizen	Gerald Lyons
Section	Page Number	Organization	
4.8 Biological Resources		Communities of Mason Neck	
Comment			
ES.6.7 Biological Resources EIS states: 'Long-term moderate and minor adverse effects would be expected by implementing any of the four land use plans and by implementing BRAC. These effects would pertain to vegetation; wildlife; and endangered, threatened, and sensitive species. • Main Post. The primary areas of biological resources concentration on the Main Post are the Southwest Area, land bordering the shores of the South Post, and the Special Natural Areas (SNA). All the alternatives would reduce vegetated areas on the post by a substantial amount and could indirectly affect vegetative communities and wildlife through habitat fragmentation and isolation and increased occurrences of invasive species, which would result in a loss of ecological integrity.'			
These are issues and impacts of pronounced concern within the Mason Neck community. We cannot emphasize enough that degradation of the natural resources on Fort Belvoir can directly degrade our shared Pohick Creek watersheds and damage the integrity of the wildlife corridors and habitats that our citizens, Commonwealth partners and federal partners on Mason Neck have worked for so long to protect.			
Response			
Thank you for the comment. No change was made to the document.			

Commenter	Comment #	Comment Type	Name
P16	P16.4	Private Citizen	Gerald Lyons
Section	Page Number	Organization	
Other		Communities of Mason Neck	
Comment			
We regret that the proposed master plan is of such a large scope, that it is difficult for us to assess the major proposed development footprints for truly measurable impacts. Without subdivision of the overall Master Plan map into a set of larger scale maps, the modeling of impacts remains a statistical analysis that defies a relational comprehension of impacts. Certainly, our communities need the published visual tools at appropriate scales to enable informed discussion of sustainable development strategies in our environmental neighborhood.			
Response			
As planning has progressed, the Army has been able to refine certain elements of several projects. The more current information, some of which is at a greater scale, is now provided in Appendix J.			

Commenter	Comment #	Comment Type	Name
P16	P16.5	Private Citizen	Gerald Lyons
Section	Page Number	Organization	
4.8 Biological Resources		Communities of Mason Neck	
Comment			
<p>ES 6.7 Biological Resources EIS states: 'EPG. Natural habitat on EPG has been re-establishing itself since the 1970s, when intensive training activities on EPG ceased. West of Accotink Creek, development has been minimal, and east of Accotink Creek, the developed areas have not been used intensively in recent years. Natural aspects of the area east of Accotink Creek—such as woody growth and the use of undisturbed open areas by breeding birds—have increased.'</p> <p>We recommend that the master planning process contain language that will impose constraints on construction activities during the peak nesting season that extends from March through June. Attendant mapping would necessarily limit constraints to the most sensitive habitat areas.</p>			
Response			
BRAC law establishes that BRAC construction must be complete by September 2011. The aggressive timeline leaves little flexibility to observe time-of-year restrictions on facility construction.			

Commenter	Comment #	Comment Type	Name
P16	P16.6	Private Citizen	Gerald Lyons
Section	Page Number	Organization	
Other		Communities of Mason Neck	
Comment			
<p>ES 6.7 Biological Resources EIS states: 'The Preferred and City Center Alternatives have the greatest adverse effects on the biological resources on EPG because they have more project development in EPG, while the Town Center and Satellite Campuses Alternatives have less development occurring on EPG. Overall, the City Center Alternative would have the greatest adverse effect on the biological resources of Fort Belvoir, followed by the Preferred Alternative. The Town Center and Satellite Campuses Alternatives would have the least impact on biological resources.'</p> <p>Again, we revisit the case for including the GSA warehousing tract in the full evaluations of impacts on natural resources and transportation.</p>			
Response			
The GSA site has been evaluated as part of the City Center Alternative. As shown in the EIS, impacts associated with the four alternatives for BRAC implementation would vary, depending on which alternative the Army ultimately selects. Because the BRAC recommendations direct realignment to Fort Belvoir, and GSA is not part of Fort Belvoir, additional legislation would be needed to allow use of the GSA parcel.			

Commenter	Comment #	Comment Type	Name
P16	P16.7	Private Citizen	Gerald Lyons
Section	Page Number	Organization	
4.3 Transportation		Communities of Mason Neck	
Comment			
<p>ES-7</p> <p>EIS states: 'For all the alternatives, the significant transportation effects would be limited to the entrance points and the immediately adjacent transportation facilities. These significant effects would disappear into the regional traffic flow within 3 to 5 miles of Fort Belvoir. While the alternatives differ somewhat in terms of the detailed extent and location of these effects, on a regional basis, beyond the 3- to 5-mile range, the effects become negligible for all alternatives.'</p> <p>Transportation effects are more likely to impact several corridors, notably, I-95, Fairfax County Parkway, Route 123, and U.S. Route 1, in ranges up to 8 to 9 miles from EPG and Fort Belvoir at Route 1, in the north, south, and westerly directions before any disappearance of effects could be measurable. In our opinion, then, the transportation effects will not, with certainty, become negligible within 3 to 5 miles of Fort Belvoir.</p>			
Response			
<p>Ninety eight percent of the 22,000 employees currently live in areas within commuting distance of Fort Belvoir. Therefore, most trips are realigned trips not new ones. The net effect on the facilities was estimated using assumptions developed in coordination with VDOT and Fairfax County Transportation Department.</p>			

Commenter	Comment #	Comment Type	Name
P16	P16.8	Private Citizen	Gerald Lyons
Section	Page Number	Organization	
4.3 Transportation		Communities of Mason Neck	
Comment			
<p>ES-8</p> <p>EIS states: 'Order-of-magnitude costs for the mitigation actions are estimated to be as follows:</p> <ul style="list-style-type: none"> • Preferred Alternative, \$458 million • Town Center, \$732 million • City Center, \$471 million • Satellite Campuses, \$742 million <p>For the Preferred and City Center Alternatives, the ability of transit to contribute to the mitigation is greater than for the other alternatives because these alternatives use sites that are closer to the regional rail network. Their locations make it easier to achieve the targeted 5 to 10 percent transit mode share goals.'</p> <ol style="list-style-type: none"> 1. Does the estimated \$458 million (Preferred Alternative) estimate include necessary connection improvements to make rail links viable? 2. Does the estimated \$458 million include necessary costs to provide on-site bus service availability or subsidies? 3. Does the estimated \$458 million represent a financial commitment from DOD in order to implement Preferred Alternative, and if not a DOD commitment of funding, is the cost included as part of the net economic impact? 4. It appears from the ES and from Chapter 4, Affected Environment, that the estimated \$458 million is funding only the mitigation of transportation impacts that are contiguous to the Fort Belvoir development sites (Preferred Alternative). Please see comments on several details in Chapter 4, below. <p>In consideration of a holistic assessment of transportation impact mitigation, the reasonable DOD responsibility for mitigation costs can grow from the DEIS estimated \$458 million to an estimated range of \$700 million to \$900 million for improvements to I-95, Fairfax County Parkway, and Route 1.</p>			
Response			
<p>The order of magnitude costs presented in the DEIS represent the construction cost of the identified transportation mitigations that currently are unfunded. Many of the transportation mitigations will be needed regardless of the BRAC actions and serve the overall transportation needs of Northern Virginia as well as Fort Belvoir. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD.</p>			

Commenter	Comment #	Comment Type	Name
P16	P16.9	Private Citizen	Gerald Lyons
Section	Page Number	Organization	
4.4 Air Quality		Communities of Mason Neck	
Comment			
<p>ES-9</p> <p>EIS states: 'For all the alternatives, implementing the BRAC action would decrease both the number of vehicles and the total vehicle miles traveled (VMT) within the region. In turn, regional motor vehicle emissions would decrease. This decrease would be primarily due to a net reduction of approximately 1,700 personnel from the region. These are personnel leaving Fort Belvoir to areas outside the NCR. These BRAC-related reductions in emissions would constitute an ongoing net benefit to the region's air quality. Increases in localized traffic near the installation, however, would result in minor increase in traffic congestion and subsequent long-term minor increases in localized carbon monoxide concentrations at nearby intersections.'</p> <p>It is difficult to imagine that a reduction of 1,700 personnel would offset an increase of 22,000 personnel to create a decrease in emissions for a net benefit to the region's air quality.</p>			
Response			
<p>Information available to the Army has been verified as accurate. Table 4.3-17 in Section 4.3.4.2.1 of the FEIS was added to demonstrate a reduction in vehicle miles traveled. Information on mobile sources of air emissions appear in Section 4.4.2.2.2 and Appendix E.1 Sections 3.1.1.2 and 3.1.3.2. The statement identified by the commenter is referring to the entire National Capital Interstate AQCR.</p>			

Commenter	Comment #	Comment Type	Name
P16	P16.10	Private Citizen	Gerald Lyons
Section	Page Number	Organization	
4.7 Water Resources		Communities of Mason Neck	
Comment			
<p>ES-11</p> <p>EIS states: 'The greatest potential expected increases in total nitrogen and total phosphorous pollutant loading to surface waters would be expected to occur under the Preferred Alternative and the City Center Alternative, with five sub-watersheds expected to increase their loads by more than 10 percent.'</p> <p>Does the statement referring to increased loading as an impact suggest that no mitigation measures are planned? A 10% load would, in our opinion, exceed acceptable standards. If mitigation measures are anticipated, as some measures are detailed in Chapter 4, then a brief synopsis, including cost estimates and technology, should certainly be included in the Executive Summary because of the great importance of water quality to the surrounding communities.</p>			
Response			
<p>As stated in the response to Comment L15.3, BMPs would be incorporated as discussed in Section 4.7. Proposed mitigation plans are appropriate within the scope of the EIS. Identification of funding sources has not yet been made. The Army would comply with all relevant and applicable federal, state, and local requirements to help ensure the Army's proper stewardship of its resources.</p>			

Commenter	Comment #	Comment Type	Name
P16	P16.11	Private Citizen	Gerald Lyons
Section	Page Number	Organization	
4.10 Socioeconomics		Communities of Mason Neck	
Comment			
<p>1-3 (from Scoping Process)</p> <p>Socioeconomics</p> <p>EIS states: 'Local communities will not have a sufficient tax base for hiring teachers and creating additional space to accommodate the influx of students.'</p> <p>One comment in the report seemed to indicate that planning for schools was on-going within the county and therefore did not need to be addressed in the report.</p> <p>EIS states: 'Examine the real commuter, road, and air quality impacts; include the precise number of contractors serving DoD entities to be relocated and the dollar figures of contracts under which these contractors perform.'</p> <p>It appears that the DOD employees were surveyed, but contractor employees numbers were not addressed.</p> <p>EIS states: 'Include precise numbers of bedrooms in the proposed housing to plan the precise number of children who will attend Fairfax County Public Schools.'</p> <p>We did not see these numbers addressed.</p>			
Response			
<p>The Army is committed to providing support to FCPS within existing funding support mechanisms, i.e., the Federal Impact Aid Program. Effects on schools are addressed in Section 4.10.2.2.2 subsection "Schools." Effects on schools were addressed at the county level. We cannot predict precisely where people might choose to live; to do so would be purely speculative. Some of the contractor personnel are already included in the analysis (see Table 2-2). These personnel were included in the population analysis in Section 4.10.2.1.2. The contractor tail is also addressed in Section 5.10, Cumulative Effects.</p>			

Commenter	Comment #	Comment Type	Name
P16	P16.12	Private Citizen	Gerald Lyons
Section	Page Number	Organization	
5 Cumulative Impacts		Communities of Mason Neck	
Comment			
<p>4-00</p> <p>EIS states: 'Transportation. On-post facilities projects, taken together, would be expected to have negligible effects on Fort Belvoir area traffic. Impacts on the transportation network associated with off-post projects would be mitigated through roadway improvements by the developers. The largest contributor to future impacts would be the proposed National Museum of the U.S. Army. This could be sited at either the North Post golf course or along Route 1, east of Pence Gate. At either location, additional road improvements would be required. To quantify the effects of the museum on the transportation system, trip generation and mode split would need to be developed for site traffic.'</p> <p>We believe that the impacts of the most likely museum sites should be incorporated into the BRAC EIS because the developments are not mutually inclusive with regards to environmental impacts, in terms of direct and cumulative impacts.</p>			
Response			
<p>The museum is not part of the BRAC action; therefore, it is not part of the analysis. The EIS recognizes these impacts as cumulative impacts (Section 5 of the EIS).</p>			

Commenter	Comment #	Comment Type	Name
P16	P16.13	Private Citizen	Gerald Lyons
Section	Page Number	Organization	
4.7 Water Resources		Communities of Mason Neck	
Comment			
4-220			
<p>EIS states: 'Fort Belvoir is incorporating storm water management and protection methods into land planning and new development as well as correcting and retrofitting existing problem areas. A storm water drainage system master plan study is currently underway, as discussed above. This study will identify current deficiencies (e.g. capacity problems, outfall problems, stream bank erosion) and determine infrastructure needs required to meet BRAC requirements and long-term growth through 2030. This study will also provide recommendations for storm water quality and quantity control, such as required design criteria, potential locations for new facilities, and methodologies that should be used or avoided. The MS4 storm water management program discussed in Section 4.7.1.3.1 requires "minimum control measures," including Best Management Practices (BMPs) to control storm water and pollutants in runoff. Fort Belvoir is developing pollution control measures that must be implemented within 5 years of permit issuance.'</p> <p>This (above) is a good example of a replacement for the non-discussion in the ES. We would like to see some cost proposals associated with an aggressive storm water management plan for newly developed areas (EPG), and some assurance during this master planning/EIS process, that adequate storm water management funding would be a part of the BRAC funding, and not subject to the vagaries of future CIP requests.</p> <p>In addition to prioritizing storm water management systems, we strongly support the inclusion of language in the adopted master plan (Preferred Alternative) that mandates the use of permeable surfaces at every opportunity for new constructed facilities or in re-constructed facilities, regardless of cost differences.</p>			
Response			
As stated in the response to comment L15.3, BMPs would be incorporated as discussed in Section 4.7. Proposed mitigation plans are appropriate within the scope of the EIS. Identification of funding sources has not yet been made. The Army will comply with all relevant and applicable federal, state, and local requirements to help ensure the Army's proper stewardship of its resources.			

Commenter	Comment #	Comment Type	Name
P16	P16.14	Private Citizen	Gerald Lyons
Section	Page Number	Organization	
4.8 Biological Resources		Communities of Mason Neck	
Comment			
ES-11			
<p>EIS states: 'Long-term moderate and minor adverse effects would be expected by implementing any of the four land use plans and by implementing BRAC. These effects would pertain to vegetation; wildlife; and endangered, threatened, and sensitive species.</p> <ul style="list-style-type: none"> • Main Post. The primary areas of biological resources concentration on the Main Post are the Southwest Area, land bordering the shores of the South Post, and the Special Natural Areas (SNA). All the alternatives would reduce vegetated areas on the post by a substantial amount and could indirectly affect vegetative communities and wildlife through habitat fragmentation and isolation and increased occurrences of invasive species, which would result in a loss of ecological integrity' <p>One of the flaws in an EIS process that is focused only on-site development impacts is that the integrity of wildlife genetic corridors is ignored at a larger cost to the connected ecological system. The very spirit and language of NEPA is directed towards consideration of extended and collateral affected environments. Thus, the potential impacts of BRAC development areas are a concern to those who support wildlife habitats on Mason Neck and in Northern Virginia.</p>			
Response			
Effects on nearby natural areas and refuges are considered in the EIS analysis, and the EIS mentions those effects that the commentor mentions. See Sections 4.8 (section introduction) and 4.8.2.1.1. The discussion of the these areas is limited because the analysis indicates a lack of impacts on them.			

Commenter	Comment #	Comment Type	Name
P16	P16.15	Private Citizen	Gerald Lyons
Section	Page Number	Organization	
4.9 Cultural Resources		Communities of Mason Neck	
Comment			
<p>ES-12</p> <p>EIS states: 'Assessment of specific adverse effects to historic properties from the proposed BRAC projects depends on the exact location of the proposed projects and the specific design details of the projects. These details include such things as building materials, construction footprint, height of buildings, and building design. Many of these project details cannot be determined until Fort Belvoir initiates the project design process. Until these details are developed, the exact nature and extent of adverse effects cannot be determined.'</p> <p>It should be possible and necessary, however, to map the existence of historic sites and document areas of prehistoric archaeological sites within the mapped development areas, in support of the idea that once an archaeological resource is buried by structural development or terraforming, the impact becomes irreversible. Such potential impacts are significant because the lands under and adjacent to Fort Belvoir and immediate vicinity were occupied in historic America to dates as early as middle 17th century (early colonial), and in prehistoric times by native Americans as early as 5000 BC. Comprehensive analysis of cultural resources belongs at the proposed land use level and prior to the Final EIS.</p> <p>Additionally, it is important to include the mapping of sites or structures of historic significance that are off-property, but adjacent to Fort Belvoir, for consideration of view-shed or transportation development impacts. The historic places on and around Fort Belvoir are important to the residents of Mason Neck and Northern Virginia because they contribute to the quality of life in irreplaceable ways.</p> <p>The following are NRHP (National Register of Historic Places) sites within or adjacent to Fort Belvoir:</p> <ul style="list-style-type: none"> - Belvoir Mansion Ruins and Fairfax Grave-site. - Pohick Episcopal Church. - Gunston Hall Plantation and Mansion. - Woodlawn Plantation. - Pope-Leighey House - Thermo-Con House, Fort Belvoir. - Alexandria Friends Meeting House and Cemetery (NRHP eligible). - Washington's Grist Mill - Mount Vernon Mansion and Plantation <p>The following are sites within the Fairfax County Inventory of Historic Sites:</p> <ul style="list-style-type: none"> - Accotink United Methodist Church. - Belvoir Mansion and Fairfax Grave. - Camp Humphreys Pump Station and Filter Building. - Fairfax Chapel. - Fort Belvoir Historic District. - Woodlawn Baptist Church (original). - U.S. Army Package Power Reactor. <p>Some sites may have been overlooked in this list.</p> <p>It should be noted that a portion of Fort Belvoir on South Post, extending through Mason Neck, contains remnants of the original route of the 600 mile Washington-Rochambeau baggage train on the march to Yorktown. The route is currently under study by National Park Service, with the Northern Virginia portion being researched by the historian as jointly funded by Northern Virginia counties. Following completion of a FEIS in the Summer of 2007, it is expected that the 600 mile length of the route will be declared a National Trail by Congress later this year.</p>			
Response			
<p>All the resources listed in the comment, plus additional ones, were given consideration in the EIS analysis (see Table 4.9-3). Potential for effects on identified archaeological sites were also assessed. Section 106 consultation could not be completed before issuing the Draft or Final EISs. However, Fort Belvoir has already initiated the process to include interested parties as consulting parties into the Section 106 process.</p>			

Commenter	Comment #	Comment Type	Name
P16	P16.16	Private Citizen	Gerald Lyons
Section	Page Number	Organization	
4.2 Land Use		Communities of Mason Neck	
Comment			
<p>Table 4.2-6 EIS states: 'Comparison of Land Use Categories Between the 1993 Land Use Plan and the Proposed Land Use Plan.'</p> <p>The proposal to bundle the category of Sensitive Land Uses with several other non-sensitive categories in effect dilutes the importance of those sensitive natural areas on Fort Belvoir by default. We insist that the category for Sensitive Land Uses not be removed or substituted by a "Community" category.</p>			
Response			
<p>The updated land use plan in the FEIS reclassified land use categories from the 1993 Master Plan in accordance with Army Regulation 210-20 and the Army's Master Planning Technical Manual (MPTM). In addition to regulatory protection requirements, environmentally sensitive areas remain protected by mitigations identified in environmental assessments and in the 1991 BRAC ROD.</p>			

Commenter	Comment #	Comment Type	Name
P16	P16.17	Private Citizen	Gerald Lyons
Section	Page Number	Organization	
4.3 Transportation		Communities of Mason Neck	
Comment			
<p>Table 4.3-17 indicates a population increase of 2,767 by 2011 on Mason Neck. Given the absence of major private land blocks, and the few remaining infill opportunities, it would be difficult to forecast a population increase greater than 400 by 2011. Possibly, the population increase in Table 4.3-17 for Mason Neck was forecast based on mapping omissions in Figure 4.3-4. The map does not indicate the 800+ acres converted to public lands (Bureau of Land Management) in 2003, nor 115 acres purchased by Fairfax County Parks Authority in April, 2007. Demographic projections cited for Mason Neck and generated by Fairfax County prior to 2000 may also be inaccurate. The implications of no capacity to further absorb employment related population increases on Mason Neck would increase the travel time to and from the south of Fort Belvoir, to be factored into traffic forecasts and commensurate air quality impacts.</p>			
Response			
<p>The study used the approved land use forecast for the metropolitan region, including the area of Mason Neck; these land use inputs were provided by the county to MWCOC, the regional planning board, for inputs into the regional travel demand model. The numbers reflected in the report are from the model inputs. The numbers are not calculated based on Table 4.3.17.</p>			

Commenter	Comment #	Comment Type	Name
P16	P16.18	Private Citizen	Gerald Lyons
Section	Page Number	Organization	
4.9 Cultural Resources		Communities of Mason Neck	
Comment			
<p>Table 4.3-9, List of Improvements Beyond the Constrained Long-Range Plan, indicates improvements to Old Colchester Road from Route 1 to its terminus. Because of its historical status, it is unlikely that Old Colchester Road will ever be altered significantly for traffic improvement. The road is a Virginia Byway, it is soon to be included in the 600 mile Washington Rochambeau National Historic Trail, and the road is also a current nominee for the National Register of Historic Places.</p>			
Response			
<p>Old Colchester Road is shown on the county's plans for improvements. The improvements design have not yet been completed, so it is not possible to quantify what the benefit will be. Note that this improvement is beyond 2011.</p>			

Commenter	Comment #	Comment Type	Name
P16	P16.19	Private Citizen	Gerald Lyons
Section	Page Number	Organization	
4.3 Transportation		Communities of Mason Neck	
Comment			
<p>P. 4-84</p> <p>EIS states: 'Transit Systems. Mode split—the fraction of the employee population that would use mass transit—for the Main Post is 1 to 2 percent. The rail portion of the transit system does not directly serve the Main Post or EPG. Implementation of the BRAC-related projects, which would affect the vast majority of new personnel at Fort Belvoir, would likely not adversely affect use of the rail systems because of the continued lack of direct service.'</p> <p>A predictable mode split of 2% at the EPG or Fort Belvoir sites is not a fundamental platform, for what was hoped to be a world class installation, by any notion of serious land use planning in the 21st century. Although it is our intent here to respond to the DEIS with special attention given to the preferred alternative, we see a more fundamental need for either a site selection directly linked to the Franconia transportation hub, or a DOD commitment to funding an appropriate rail expansion to Fort Belvoir. Bus service alone could not contribute significantly to the needed mode split, nor would a more fragmented user trip help to attract additional mass transit users.</p> <p>The modal split issue provides an example of the reason our thinking is aligned with Representatives Davis and Moran in their insistence that the site selection process should not be closed, and that the alternative GSA warehouse site should be seriously considered.</p>			
Response			
<p>The study uses existing mode split as the baseline for analyses, then identifies TMP and transit as mitigating actions. The Record of Decision will identify the mitigating actions to be carried forth.</p>			

Commenter	Comment #	Comment Type	Name
P16	P16.20	Private Citizen	Gerald Lyons
Section	Page Number	Organization	
4.3 Transportation		Communities of Mason Neck	
Comment			
<p>Statement on page 4-154:</p> <p>EIS states: 'Motor Vehicles. The realignment of Fort Belvoir would decrease both the number of vehicles and subsequently the total vehicle miles traveled within the region. In turn, regional motor vehicle emissions would decrease. This decrease would be primarily because of a net reduction of approximately 1,700 personnel leaving Fort Belvoir to locations outside the region. Although overall additional personnel at Fort Belvoir is expected to increase, the new personnel and the miles they currently commute are already with in the NCR. In addition, many of the new personnel are expected to either relocated to or be replaced by individuals living in areas outside, primarily south of, the region. These BRAC-related reductions in emissions would constitute an ongoing net benefit to the region's air quality. Therefore, although there is an SIP-based regional budget for motor vehicles, it was unnecessary to perform a direct comparison.'</p> <p>This statement is either inaccurate or simply obtuse because the BRAC Commission's recommendations will generate a net increase of 22,000 people in the workforce on Fort Belvoir.</p> <p>It would seem that a comparison of emissions based on the net increase of 22,000 personnel, with 68% commuting to and from the south, contributes to a measurable load in traffic, travel delay, and the resulting emissions.</p>			
Response			
<p>The statement referred to in the comment describes regional impacts, and the BRAC action relocates jobs from other parts of the NCR. These people, or even new people who replace retirees, etc. will live in the region. The EIS does state that there are local impacts.</p>			

Commenter	Comment #	Comment Type	Name
P16	P16.21	Private Citizen	Gerald Lyons
Section	Page Number	Organization	
4.3 Transportation		Communities of Mason Neck	
Comment			
<p>Excerpts from the written statements by Virginia Secretary of Transportation, Mr. Pierce Homer, during the BRAC DEIS Scoping phase (Appendix B, Part 3), reflect the opinions of many of us in Northern Virginia and in Mason Neck:</p> <p>“.....Virginia will provide approximately \$89 million in construction funding for this (final segment of Fairfax County Parkway) Fairfax County Parkway project and approximately \$4 million worth of completed preliminary engineering work. Once the project and directly-related environmental remediation is complete, the Commonwealth will accept the Parkway into the state system of highways for long-term maintenance and operations. This arrangement will allow the Department of the Army, in consultation with the Commonwealth and the Federal Highway Administration, to design and construct the Fairfax County Parkway in a way that better integrates the limited available transportation capacity with the specific land uses and security needs of Fort Belvoir.</p> <p>In addition, Virginia will fully fund and construct a fourth lane on I-95, from Rt. 123 to the Fairfax County Parkway, at an estimated cost of approximately \$75 million.</p> <p>I need to underscore, however, that any serious analysis of the long-term Fort Belvoir transportation needs must consider more than just the final segment of the Fairfax County Parkway and the I-95 fourth lane.”</p> <p>It is our opinion that the impacts of BRAC proposed development on transportation capacity will extend from Fort Belvoir to I-66 on Fairfax County Parkway, from the Fairfax County Parkway to Route 234 on I-95, and from Fort Belvoir to Route 123 on Route 1. Additionally, because of collateral non-DOD support services and secondary commercial enterprises locating or re-locating to Fort Belvoir nearby locations (estimate 3,000-5,000 employees to the south, and 5,000-6,000 to the north), transportation capacity should be considered from Route 123 to I-495 on Route 1.</p> <p>It appears to us that the DEIS and supporting studies have only considered the immediate Fort Belvoir-serving infrastructure elements of the larger affected environment, and this is an important concern for all of us in Mason Neck and Northern Virginia who may be obliged to fund transportation solutions in the future resulting from full BRAC implementation (2011-2016).</p> <p>Regarding potential road improvements within Fort Belvoir, however, the BRAC generated facility master plan offers an opportunity to finally connect Main Post with North Post efficiently with a flyover(s) at Route 1, thus allowing unimpeded communication between the two properties, along with further streamlining traffic flow on Route 1.</p>			
Response			
<p>The Study Team worked with Fairfax County and VDOT to develop the appropriate land use plans that should be assumed for modeling purposes. It was determined that land use changes from future contractor tails represent speculation and that the current modeling tools do not provide the information or tools to assess these types of potential changes. Non-embedded contractors are treated as visitors and thus accounted for in the traffic assignments. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.</p>			

Commenter	Comment #	Comment Type	Name
P16	P16.22	Private Citizen	Gerald Lyons
Section	Page Number	Organization	
4.3 Transportation		Communities of Mason Neck	
Comment			
<p>In summary, we believe that many of the analyses in the DEIS are of extraordinary value to the community at large and to the implementation of BRAC at Fort Belvoir, especially those addressing economic impacts and transportation impacts. We would only emphasize here once again, the need of an EIS with important transportation implications, to reach beyond minimum NEPA requirements - to examine and report impacts at a scale commiserate with realistic regional influence.</p>			
Response			
<p>The EIS adheres to NEPA requirements, with due regard for scale and region of influence.</p>			

Commenter	Comment #	Comment Type	Name
P16	P16.23	Private Citizen	Gerald Lyons
Section	Page Number	Organization	
4.8 Biological Resources		Communities of Mason Neck	
Comment			
Further to that, we must observe that although the transportation impacts of BRAC are of great political and popular importance, a more publicly quiet environmental advocacy in these neighborhoods surrounding Fort Belvoir would wish to see the assessments of biological impacts and water quality impacts taken to a higher, even restorative, level of mitigation, including funding proposals.			
Response			
Thank you for the comment.			

Commenter	Comment #	Comment Type	Name
P16	P16.24	Private Citizen	Gerald Lyons
Section	Page Number	Organization	
Other		Communities of Mason Neck	
Comment			
Finally, we believe that one of the most important services that Department of the Army could provide to the Northern Virginia communities is to establish a community stakeholders group that is inclusive of businesses, churches, local schools, and the many citizens groups whom will experience the impacts and benefits of change brought to Fort Belvoir.			
Response			
As prescribed by Council on Environmental Quality regulations and Army policies, the Army has conducted its environmental analysis process and path toward decision making openly with the public and interested federal, state, and local agencies. In addition to a scoping meeting at the outset of the NEPA process, the Army has held other public meetings to enable the public to be informed of relevant issues. The Army extended the public comment period on the draft EIS to 60 days to allow thorough review by the public and agencies. The Army has also hosted a "Board of Advisors" to keep community leaders informed of the status of BRAC. At neighborhood groups' request, the Army has provided knowledgeable personnel to appear at meetings to allow residents to ask questions and better understand the Army's proposals. These measures have been beneficial in that they have enabled the Army to be aware of and sensitive to community concerns. As circumstances warrant, the Army can provide further opportunities for community awareness.			

Commenter	Comment #	Comment Type	Name
P16	P16.25	Private Citizen	Gerald Lyons
Section	Page Number	Organization	
Other		Communities of Mason Neck	
Comment			
We citizens of Mason Neck have grown to share the responsibility for our treasures with our institutional neighbors. This sort of protective drive makes us sensitive to the impact potential of processes introduced into our environmental neighborhood. With that kind of background, we will express our concerns about water quality, air quality, the chain reactions of environmental quality degradation generated by traffic congestion along corridors, historic preservation, and wildlife conservation, by commenting on the contents of the DEIS. Therefore, we feel it appropriate to request Consulting Party Status.			
Response			
Council on Environmental Quality regulations and Army policy for implementing the National Environmental Policy Act do not provide for an agency's conferring "consulting party" status. Rather, the public involvement component of NEPA provides for publishing a notice of intent to prepare an EIS, public scoping, and opportunity to comment on a draft EIS. These measures give local communities a voice in the decision-making process.			

Commenter	Comment #	Comment Type	Name
P16	P16.26	Private Citizen	Gerald Lyons
Section	Page Number	Organization	
Other		Communities of Mason Neck	
Comment			
<p>Additionally, we believe that one of the most important services that Department of the Army could provide to the Northern Virginia communities is to establish community stakeholders group that is inclusive of businesses, churches, local schools, and the many citizens groups whom will experience the impacts and benefits of change brought to Fort Belvoir. This group should meet regularly and work in partnership with decision makers throughout every last step of the process and designate working groups to focus on cultural, biological, environmental quality, design and traffic aspects.</p>			
Response			
Please see the response to Comment P16.24, above.			

Commenter	Comment #	Comment Type	Name
P16	P16.27	Private Citizen	Gerald Lyons
Section	Page Number	Organization	
Other		Communities of Mason Neck	
Comment			
<p>In summary, we believe that many of the analyses in the DEIS are of extraordinary value to the community at large and to the implementation of BRAC at Fort Belvoir, especially those addressing economic impacts and transportation impacts. We would only emphasize here once again, the need of an EIS with important transportation implications, to reach beyond minimum NEPA requirements – to examine and report impacts at a scale commiserate with realistic regional influence. Further to that, we must observe that although the transportation impacts of BRAC are of great political and popular importance, a more publicly quiet environmental advocacy in these neighborhoods surrounding Fort Belvoir would wish to see the assessments of biological impacts and water quality impacts taken to a higher, even restorative, level of mitigation, including funding proposals. Further, as stated above, this continued analyses and planning should only take place in concert and through active involvement of a dedicated community stakeholders group.</p>			
Response			
Comment noted. Please see the responses to Comments P16.1 through P16.26 above.			

Commenter	Comment #	Comment Type	Name
P17	P17.1	Private Citizen	Martha Catlin
Section	Page Number	Organization	
4.9 Cultural Resources			
Comment			
<p>I am concerned that the National Environmental Policy Act review process for BRAC appears to be far more advanced than the Section 106 review process. I believe it is important that critical decisions not be made without full consideration of effects to historic properties through Section 106 consultation among all stakeholders.</p>			
Response			
<p>Not enough information regarding the proposed BRAC-related activities is available to conduct a detailed Section 106 assessment of effect. However, Fort Belvoir believes that there is sufficient information to make the public aware of the character, nature, and extent of potential effects that could arise from these proposed activities, which are thus analyzed in the EIS.</p>			

Commenter	Comment #	Comment Type	Name
P17	P17.2	Private Citizen	Martha Catlin
Section	Page Number	Organization	
Other			
Comment			
<p>I am also concerned that the DEIS attempts to address land use planning in a manner that appears to be entirely disconnected from the BRAC issues. Clarification of the rationale for land use proposals- whether or not they are BRAC related- is needed before these proposals can be evaluated.</p>			
Response			
<p>The rationale underlying land use classification changes relates to the need to implement BRAC in a manner that best serves Fort Belvoir's long-term interests. The various development scenarios, or alternatives, reflect different ways to accommodate changes. In several instances, the changes require reclassification of land uses. Please see the response to Comment L1.4.</p>			

Commenter	Comment #	Comment Type	Name
P17	P17.3	Private Citizen	Martha Catlin
Section	Page Number	Organization	
4.9 Cultural Resources			
Comment			
<p>The level of information included in the DEIS is also inadequate for selection of a preferred alternative, especially regarding effects to historic properties. I would note that, as written, the DEIS includes BRAC alternatives that, with further analysis and adjustment, may have the potential to avoid or minimize impacts to historic properties through concentration of new development and functions away from sensitive historic properties. However where the DEIS identifies specific land use proposals to be paired with such alternatives, the protection of historic properties appears to be outweighed or reversed. Therefore, the relationship between each alternative and its associated land use proposals, perhaps through lack of explanation, seems arbitrary. Among the most troubling examples of this is the proposal to construct a new access road or control point opposite Pence Gate. It is not clear why this land use element must be introduced into alternatives that otherwise could, in comparison to other alternatives, be preferable for their potential to avoid historic property impacts.</p>			
Response			
<p>The EIS analyzes the potential for effect on cultural resources that would result from proposed activities as described in Chapters 2 and 3 for the Preferred Alternative and the four other alternatives. The Section 106 process has been initiated for the proposed action. When more detailed information is available, opportunities for adjustment to the proposed undertaking can be explored through the consultation process between Fort Belvoir, SHPO, and interested parties.</p>			

Commenter	Comment #	Comment Type	Name
P17	P17.4	Private Citizen	Martha Catlin
Section	Page Number	Organization	
4.9 Cultural Resources			
Comment			
<p>I strongly support the preservation of all historic properties potentially affected by Fort Belvoir's BRAC activities, including direct, indirect, and cumulative impacts. The Virginia State Historic Preservation Officer has listed, in Marc Holma's letter of April 4, 2007, to Colonel Lauritzen, some of the highly significant historic properties on or near Fort Belvoir, including three National Historic Landmarks, that should be considered under NEPA. Another highly significant historic property that I would add to this list is the Mount Vernon Memorial Highway, which would certainly become more congested as a result of BRAC, and could suffer considerable loss of National Register integrity as a result. The National Park Service's views should be sought and considered regarding the protection of both the affected National Historic Landmarks and the George Washington Parkway, the park unit of which the Mount Vernon Memorial Highway forms a part. The majority of the most significant of the potentially affected historic properties, including those which are destination heritage sites, are located near the main post of Fort Belvoir and could be protected from adverse impacts through concentration of new development and functions at the Engineering Proving Ground and the GSA parcel.</p>			
Response			
<p>Comment noted. Thank you for your interest. Your comment will be made part of the administrative record of the action.</p>			

Commenter	Comment #	Comment Type	Name
P17	P17.5	Private Citizen	Martha Catlin
Section	Page Number	Organization	
4.9 Cultural Resources			
Comment			
<p>In addition to the full range of historic properties potentially affected, I have a particular concern regarding the impact of Fort Belvoir's BRAC decisions on the Woodlawn Quaker Meetinghouse and Burial Ground, a property whose history and architecture I have researched over many years and whose unusual historical significance has been confirmed and documented. This unique surviving element of the pre- and post-Civil War Woodlawn and Accotink anti-slavery Quaker settlement is currently threatened by a number of changes, many of which were brought about by security measures necessitated by the events of September 11, 2001. Fort Belvoir officials are to be commended for having worked closely with the Meeting and other stakeholders, including myself, to help ameliorate such threats. As BRAC decisions are considered, I hope the work that has been accomplished by Fort Belvoir through consultation with the Meeting and others is not reversed or eroded. In September 2006, the Virginia State Review Board approved the "Preliminary Information Form" submitted by the Alexandria Monthly Meeting of the Religious Society of Friends (at Woodlawn) for purposes of nominating the Meetinghouse property to the National Register of Historic Places. I request that the DEIS be revised to reflect the status of the Woodlawn Meetinghouse and Burial Ground as having been determined individually eligible for the National Register of Historic Places. In recognition of the status of the Meetinghouse property as individually eligible for the National Register, I request that the DEIS be revised to more adequately identify and address the full range of anticipated effects each of the alternatives would have on the characteristics of the Meetinghouse property that qualify it for the National Register. The DEIS, as written, notes that the Meetinghouse property is eligible for the National Register as a component of the Woodlawn Historic District and that the property is a component of the Fairfax County Woodlawn Historic Overlay District. However, in addition to inadequate recognition of the historical significance of the Meetinghouse property, the DEIS also fails to adequately document the significance of either of the two historic districts of which the Meetinghouse is a part. These two intersecting historic districts represent a remarkable continuum of history in southern Fairfax County that is currently reinforced and complemented by Fort Belvoir's open space, its natural areas, and its vistas. A BRAC alternative that places new construction and new functions at the Engineering Proving Ground and the GSA parcel could help preserve the complementary role of Fort Belvoir's open spaces and vistas with respect to its neighboring historic properties.</p>			
Response			
<p>Section 4.9 has been revised to recognize that the Friends Meeting House and Burial Ground is now determined eligible for the National Register because its individual significance. The matter raised represents a level of detail unnecessary to adequately understand relevant issues. The EIS provides adequate information on the status of the historic properties within and surrounding Fort Belvoir needed to present a preliminary analysis of potential effects on these properties. Detailed assessment of the effects would be conducted during the Section 106 consultation process for the proposed undertakings.</p>			

Commenter	Comment #	Comment Type	Name
P17	P17.6	Private Citizen	Martha Catlin
Section	Page Number	Organization	
4.9 Cultural Resources			
Comment			
<p>The DEIS attributes much of its now outdated and inadequate information on historic properties to studies by Goodwin & Associates from 2001. Apparently such studies were done as part of Fort Belvoir's Integrated Cultural Resources Plan. The DEIS states that the ICRMP is to be updated on a five-year cycle, suggesting that the update is overdue. In light of the adverse effects to historic properties alluded to but inadequately analyzed in the DEIS, it is important and could be quite useful for Fort Belvoir to immediately begin to address this need and to seek and consider the views of stakeholders on the ICRMP so that the updating of the Plan may correlate with and inform the NEPA process for BRAC.</p>			
Response			
<p>The ICRMP has not been updated since its original development in 2001. Updating of the document could be addressed in the Programmatic Agreement.</p>			

Commenter	Comment #	Comment Type	Name
P17	P17.7	Private Citizen	Martha Catlin
Section	Page Number	Organization	
4.5 Noise			
Comment			
<p>A significant threat to the Meetinghouse historic property is the possibility of an increase in noise levels. The DEIS notably lacks adequate methodologies for noise assessment and abatement and it does not adequately acknowledge the central importance of silent worship to the continued use and viability of the Meetinghouse as a place of worship by its Quaker congregation. It is unacceptable for the DEIS to state that "currently no existing information is available" for the Meetinghouse and Burial Ground, and to merely identify the property as a "noise sensitive receptor" without providing any data, much less analysis of data. "Baseline estimates" and "projected" changes in future noise levels are inadequately explained and, as presented, do not qualify as analysis. To accomplish its purpose, the DEIS should incorporate a noise analysis methodology that would accurately measure existing and future noise levels so that such information can be utilized in decision-making concerning all potentially affected areas. In the case of the Meetinghouse, the issue of noise level assessment is critical: if the Meetinghouse is to continue to be viable in its historic use as a place of silent worship, accurate information is needed to ensure that steps can be taken and decisions made that would keep increases in noise levels to a minimum in the vicinity of the Meetinghouse and grounds.</p>			
Response			
<p>Information on matters outlined in the comment appear in several tables in Section 4.5. The Army has verified that its information is correct. Noise monitoring represents a level of detail unnecessary to adequately understand relevant issues.</p>			

Commenter	Comment #	Comment Type	Name
P17	P17.8	Private Citizen	Martha Catlin
Section	Page Number	Organization	
4.9 Cultural Resources			
Comment			
<p>Another extremely important issue for the continued use and viability of the Woodlawn Meetinghouse and Burial Ground is that of adequate and safe access for individuals and families of members, attenders, and visitors. The DEIS does not identify or address this issue; however, the implications for continued access to the Meetinghouse are evident throughout the alternatives described in the DEIS. The Meetinghouse, in addition to Woodlawn Plantation, the Jacob Troth House, and other components of the Woodlawn Historic District, is situated within a zone that is treated as a major gateway to the post. Approaching from Route One north of Fort Belvoir, vehicles pass through the heart of the Woodlawn Historic District. All proposal for increased use of this corridor, including modifications to the post's entrance points, would impact the Historic District and its component historic properties. The Meetinghouse is currently accessible only by virtue of temporary measures arranged with Fort Belvoir to accommodate changes that resulted from the closure of Woodlawn Road. Its future accessibility is not assured and is not addressed in the DEIS. To minimize impacts to the Historic District, BRAC development should be planned to ensure that expected traffic increases, as well as the measures needed to accommodate such increases, occur in less sensitive areas, such as the Engineering Proving Ground and the GSA parcel.</p>			
Response			
<p>The Army is working with Friends Meetinghouse to continue to support access to their property through the Section 106 process and other means.</p>			

Commenter	Comment #	Comment Type	Name
P18	P18.1	Private Citizen	Joseph Chudzik
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>Selecting the former site of the Engineer Proving Ground (EPG) as the "preferred" alternative for the BRAC relocation is a serious mistake. On its west side, the EPG is located off I-95, the major U.S. East Coast arterial, a regional highway, and local commuter route. Approximately 21,000 people, about the same number of employees at the Pentagon, will arrive to work at Ft. Belvoir - doubling the current number. The EPG has no public transportation services available. Traffic congestion around present Ft. Belvoir and the entire Mt. Vernon District, severely impacted by the closure of Woodlawn Road to the public, has become "unbearable.": The National Capital region has the fourth highest congested traffic in the nation. The current transportation infrastructure cannot serve the BRAC proposals. Ten or more major road improvement projects are proposed to accommodate the increased workforce. Only one of these projects has an identified funding source. Since DOD "does not build roads," there is an unfunded mandate of half-a-billion dollars imposed on state and local governments. It is highly unlikely that the required transportation infrastructure could be in place by the BRAC 2011 deadline. The planned establishment of the Army Museum at Ft. Belvoir is expected to attract one million visitors each year. The DEIS does not adequately address the impact of this development on the transportation infrastructure related to BRAC.</p>			
Response			
<p>The analysis of transportation impacts and costs of proposed improvements indicate development closer to I-95 is more cost-effective. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD. The Museum is not part of the BRAC action and will have its own NEPA process, therefore is not part of the analysis. The EIS recognizes impacts from the Museum as cumulative impacts (Section 5 of the EIS).</p>			

Commenter	Comment #	Comment Type	Name
P18	P18.2	Private Citizen	Joseph Chudzik
Section	Page Number	Organization	
Other			
Comment			
<p>Serious consideration should be given to relocating the National Geospatial Intelligence Agency (NGA) at the GSA warehouse complex near the Springfield Metro (Blue Line) station. Northern Virginia's elected officials have requested Ft. Belvoir BRAC to utilize the GSA warehouse facility. Use of the EPG however, should be limited to an agency relocation site only.</p>			
Response			
<p>At the outset of developing various scenarios for locating units, agencies, and activities, Belvoir New Vision Planners allowed all options to be on the table. On the basis of BNVP's recommendations, the Army's proposal to locate NGA at EPG takes into consideration several factors that might render this option unobtainable, such as size of the workforce and operational security. Taken together, the four alternatives for BRAC implementation provide the Army an adequate, representative array of options from which a sound result can be obtained.</p>			

Commenter	Comment #	Comment Type	Name
P18	P18.3	Private Citizen	Joseph Chudzik
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>The EIS estimates increased traffic of 10-30% on area roads with a corresponding increase in pollution and decrease in air quality. The National Capital Region does not meet the current Ambient Air Quality standards for ozone and fine particulates. While the EIS identifies some emissions, it ignores other significant emissions that can be expected and concludes that only minor impacts will occur.</p>			
Response			
<p>Thank you for the comment. Information on matters outlined in the comment appear in Section 4.4.</p>			

Commenter	Comment #	Comment Type	Name
P18	P18.4	Private Citizen	Joseph Chudzik
Section	Page Number	Organization	
Other			
Comment			
<p>The DEIS indicates, Figures 2-3 and 2-4, over 3,000 acres of land that has natural constraints, that are no longer labeled as environmentally sensitive and labels over a hundred acres of Accotink watershed land as "Professional/Institutional." The streams and watersheds within Ft. Belvoir should be accurately labeled and consistent with the protections under the Chesapeake Bay Preservation Act and other Federal law protecting existing streams from the effects of development. Land use classifications should retain the environmentally sensitive classification established to protect wetlands, provide wildlife habitat, and protection for endangered and threatened species. DOD should be required to comply with all existing federal, state, and local regulations related to the Chesapeake Bay Preservation Act and other relevant ordinances. Ft. Belvoir's Integrated Natural Resources Management Plan (INRMP) should include a provision requiring coordination with the Virginia Department of Conservation and Recreation, Game and Inland Fisheries, and the U.S. Fish and Wildlife Service. The Ft. Belvoir Master Plan is not being updated to provide a reasonably comprehensive picture of actions to be taken as a result of the DEIS that proposes to eliminate environmentally sensitive lands and destroy critical wildlife habitat on the Ft. Belvoir post.</p>			
Response			
<p>Fort Belvoir complies with all relevant and applicable laws protective of the environment. Elimination of the environmentally sensitive land use classification does not affect the way in which Fort Belvoir views these environmentally sensitive areas or the degree of careful consideration applied to all development projects, whether they are minor or major. No part of Fort Belvoir has been designated as critical habitat, as that term is used with respect to the Endangered Species Act. Fort Belvoir is coordinating with USFWS and state natural resources agencies regarding BRAC and endangered species. Revision of the post's Real Property Master Plan is underway, and follow-on NEPA documentation would analyze the environmental impacts of that plan.</p>			

Commenter	Comment #	Comment Type	Name
P18	P18.5	Private Citizen	Joseph Chudzik
Section	Page Number	Organization	
Other			
Comment			
<p>The BRAC DEIS lacks the procedural processes that are required under the Administrative Procedures Act and other federal guidelines that require the establishment of a public docket for the review of materials in the Administrative Record.</p>			
Response			
<p>Neither the Council on Environmental Quality regulations nor Army policy requires the establishment of a public docket for environmental analysis documentation pursuant to the National Environmental Policy Act.</p>			

Commenter	Comment #	Comment Type	Name
P19	P19.1	Private Citizen	John Sperling
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>As a resident of the Springfield area where I live and work, the quality of life within the area surrounding the Ft Belvoir complex to include the Engineering Proving Ground (EPG) will be greatly impacted by the BRAC. The nearly 22,000 new workers that are slated to be relocated to Ft Belvoir will face a 12 hour per day traffic jam with peak commuter traffic seeing a three-hour delay entering and exiting the post. The personnel addition at Ft Belvoir is the equivalent of re-sighting the Pentagon at Ft Belvoir! The key difference is the Pentagon was built more than 60 years ago with the focus on moving ~ 25,000 into the area each day.</p>			
Response			
<p>The statement is correct if mitigating actions are not considered.</p>			

Commenter	Comment #	Comment Type	Name
P19	P19.2	Private Citizen	John Sperling
Section	Page Number	Organization	
4.10 Socioeconomics			
Comment			
<p>Being a resident of Springfield and actively involved with the revitalization of the area, one must be concerned with the drain and negative impact BRAC will have on the growth of commercial business development within the central part of Springfield. With three major redevelopment programs on the horizon, the full implementation of BRAC could delay or halt any or all of these projects. With the announcement and beginning of the Springfield Mixing Bowl project, the second largest public works project outside of the Boston Tunnel Project, property values for commuters within a few miles of the Mixing Bowl were impacted by a seven to ten or greater percent reduction in property values that took many years to recover. We in the Springfield area want our community to be a place to go to rather than a place to go through. With the imposed traffic congestion at Ft Belvoir, business and residential opportunities will avoid Springfield for it will be far too hard for these businesses to compete with the facilities on the base. Like the Pentagon and other encapsulated military 'communities' the people who work on-site will eat and stay on site for it will be too hard to travel off base and return in a reasonable time.</p>			
Response			
Comment noted. Thank you for your interest and support. Your comment will be made part of the administration record of the action.			

Commenter	Comment #	Comment Type	Name
P19	P19.3	Private Citizen	John Sperling
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>One reason for the move from current secure locations to Ft Belvoir was the issue of terrorist attacks. Under consideration for development at Ft Belvoir is the building of two bases split by one of the busiest interstate highways in the nation. Interstate 95 becomes a traffic jam and comes to a halt in the morning as well as in the evening. During peak weekend and holiday travel times, it often takes hours to travel less than 30 miles. Splitting the development between Ft Belvoir and the EPG will require duplicate security forces, duplicate fire protection, duplicate fitness and day-care centers as travel between the two facilities would be stalled by either I-95 or the Springfield-Franconia Parkway. The division of forces (and facilities) is contrary to military teaching that goes back thousands of years to the great military philosopher Sun Tzu.</p>			
Response			
Comment noted.			

Commenter	Comment #	Comment Type	Name
P19	P19.4	Private Citizen	John Sperling
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>If the real concern for the environment is evaluated, then the addition of a southern platform at the Springfield-Franconia METRO and VRE terminal would be an ideal solution. Building a south terminal platform and staying with the Town Center Alternative would allow for the maximum utilization of mass transportation. Traveling south from the new south platform, shuttle buses could travel a newly built and improved road directly from the METRO/VRE into Ft Belvoir without getting onto the Springfield-Franconia Parkway or crossing over I-95. All the current plans for siting the additions to Ft Belvoir, except the Town Center Concept and not building of a south platform or terminal, forces all mass transit travelers to come onto the Parkway and greatly impacting the current heavy traffic on the roadway. Of each dollar Northern Virginia residents send to Richmond less than 19 cents comes back to area where road improvements are desperately needed as the current transportation networks are choked to the breaking point.</p>			
Response			
<p>The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. Funding of transportation projects will also be addressed in the ROD.</p>			

Commenter	Comment #	Comment Type	Name
P19	P19.5	Private Citizen	John Sperling
Section	Page Number	Organization	
4.3 Transportation			
Comment			
The road improvements maps have cut short many of the surrounding areas where road construction is planned or recommended. Several maps that are shown or used at briefings cut short many areas on the northern edge of the EPG grounds where new road improvements or construction is seen. Recommend that the maps more correctly show areas outside the immediate areas of potential use by the BRAC relocations.			
Response			
Comment noted. Graphics will be revised for future presentations.			

Commenter	Comment #	Comment Type	Name
P19	P19.6	Private Citizen	John Sperling
Section	Page Number	Organization	
4.3 Transportation			
Comment			
Keeping all the construction on the east side of I-95 greatly impacts the ability to provide inter as well as intra base transportation. Transportation links could easily be built to handle this type of inter as well as intra base needs. Links to the METRO and other commuter lots or nodes would be greatly improved by using the single base concept. Splitting bases only adds to the mix and doubles the inter and intra base transportation problem. Larger entry and inspection access points could be built verses the need to build more in number for a two base concept.			
Response			
See the Town Center or Satellite Campuses Alternatives. These two alternatives keep all development to the east of I-95.			

Commenter	Comment #	Comment Type	Name
P19	P19.7	Private Citizen	John Sperling
Section	Page Number	Organization	
Other			
Comment			
To better support the Town Center concept of development, Davison Army Airfield needs to be part of the new Ft Belvoir build-up. Davison Airfield is a very limited use facility. The Ft Belvoir installation commander has repeatedly referred to the air strip as a VIP or executive use facility. Less than 150 cars can be found on the airfield on any particular day and should it rain that day, the number is cut in half. It is termed a limited use facility by the FAA for it has few navigational aids. The least amount of weather causes the airfield to close to all traffic. As for the field tenants, all could be easily moved to other nearby locations. The DC Army Guard should be moved to Reagan National Airport after all general aviation users were moved from the airport. The Guard's few assets would be closer to the DC National Guard headquarters if relocated to National IAP. The 12th Aviation Battalion could be moved to better serve the Army as their website talks of building clearing after natural or man-made disasters or crowd control at the Nation's Capitol Air Show at Andrews AFB, MD and lists few Army related Aviation activities. The VIP and executive traffic could and should be moved to Andrews where a whole VIP and protocol activity is currently in place. All the other activities at Davison could be moved to other parts of the base, Quantico, Andrews, National, or other bases. At a Congressional Oversight Hearing last year, the Assistant Secretary of the Army for Installation, when questioned about the use or potential use of Davison Airfield by Congressmen Davis, testified that 'Davison could be used as part of the BRAC relocation to Ft Belvoir if the Army found new locations for the current tenants at the airfield.' The Army installation commander, the folks working the BRAC and others have not fully considered the use of Davison airfield in the BRAC process and should be encouraged to modify the Town Center Alternative for including the airfield. The inter and intra transportation modes to best support the single base concept would be better suited by the construction of a few bridges or tunnels to avoid impacting the civilian traffic on the four-lane section of the Parkway extension currently dividing Ft Belvoir/DLA and Davison Airfield.			
Response			
The Satellite Campuses Alternative considers use of Davison Army Airfield to support BRAC implementation. If that alternative is selected, units, agencies, and activities at DAAF would either cease operations or have to be relocated. Such future locations, whether in the National Capital Region or elsewhere, have not been determined.			

Commenter	Comment #	Comment Type	Name
P19	P19.8	Private Citizen	John Sperling
Section	Page Number	Organization	
Other			
Comment			
<p>The reuse of Davison makes for a unified protection plan for Ft Belvoir and avoids the base split by I-95 and the protection of two large operation locations. The reuse of Davison Airfield leaves the EPG section for the Army Museum, a Fairfax County Park, and other Army culturally-correct attractions. Like the Marine Corps Museum at Quantico --- easily seen from I-95, an easily acceptable Museum would greatly improve the number of people who would consider attending the Army Museum. To say that the Army Museum attracts the same type of folks who might be visiting George Washington's Mt Vernon is using some very fallacious logic. The type of visitors to the Army Museum are the veteran, retired and service-associated folks who visit the Marine Corps Museum or the Air Force Museum at Wright-Patterson AFB, OH.</p>			
Response			
<p>The Army agrees with the commentor's observations. The four alternatives for BRAC implementation, each of which has positive and negative characteristics, provide the Army a representative array of options from which a sound result can be obtained. The Army museum is not part of the BRAC action; therefore, it is addressed as part of the cumulative impacts and will follow its own NEPA process.</p>			

Commenter	Comment #	Comment Type	Name
P19	P19.9	Private Citizen	John Sperling
Section	Page Number	Organization	
Other			
Comment			
<p>In addition to the above-mentioned issues, the BRAC Ft Belvoir have yet to address the GSA Warehouse, Springfield, VA, as a possible location for the new hospital at Ft Belvoir. At the BRAC April 17th Public Meeting, many federal and state elected officials mentioned the relocation of Walter Reed Medical Center not to Ft Belvoir as seen in the BRAC proposal, but to the GSA Warehouse site. Closer to METRO and other transportation nodes as well as the NOVA Medical training site, no one has looked at the hospital relocation options.</p>			
Response			
<p>Belvoir New Vision Planners formulated the Army's alternatives for BRAC implementation. The many variables -NGA, WHS, the hospital, and so forth- allow a large number of possible combinations for siting of units, activities, and agencies on Main Post, EPG, or the GSA site. The Army has a suitable, representative array of options from which a sound result can be obtained. Because the BRAC recommendations direct realignment to Fort Belvoir, and GSA is not part of Fort Belvoir, additional legislation would be needed to allow use of the GSA parcel.</p>			

Commenter	Comment #	Comment Type	Name
P20	P20.1	Private Citizen	Nancy James
Section	Page Number	Organization	
4.5 Noise		Religious Society of Friends (Quakers)	
Comment			
<p>3. Our meeting house is a cultural and religious resource as well as an historic property. As our worship is primarily silent, increased noise is of great concern to me.</p> <p>I am most grateful that the preferred site for the Army Museum was first changed from adjacent to our property to the east side of Route 1, and is now at the corner of Kingman Road and the Fairfax County Parkway. The sounds of helicopters overhead and of guns firing would make our form of worship impossible. Ideally, the Museum would be located as far away as possible from our meeting house. Placing the Army Museum on the Engineering Proving Grounds , the City Center alternative, would best meet our needs.</p>			
Response			
<p>Information on matters outlined in the comment appear in Section 4.5. The Army museum is not part of the BRAC action; therefore, it is addressed as part of the cumulative impacts (Section 5 of the EIS) and will follow its own NEPA process.</p>			

Commenter	Comment #	Comment Type	Name
P20	P20.2	Private Citizen	Nancy James
Section	Page Number	Organization	
4.11 Aesthetics		Religious Society of Friends (Quakers)	
Comment			
I note that project #15, "Access Control Point" proposes the placement of a new security gate in what is now a soccer field directly behind our property. Our meeting needs to be protected from any adverse visual and/or auditory effects that may result from this placement.			
Response			
Information on matters outlined in the comment appear in several tables in Section 4.5. The Army has verified that its information is correct. Additional noise monitoring represents a level of detail unnecessary to adequately understand relevant issues. Visual impacts from the Access Control Point project are discussed in Sections 4.9 and 4.11.			

Commenter	Comment #	Comment Type	Name
P20	P20.3	Private Citizen	Nancy James
Section	Page Number	Organization	
4.2 Land Use		Religious Society of Friends (Quakers)	
Comment			
I also have several environmental concerns. Please retain the designation "environmentally sensitive" in your current land use proposal, in order to designate areas needing protection from the effects of development. And include plans for bike paths and facilities in your designations.			
Response			
The updated land use plan in the FEIS reclassified land use categories from the 1993 Master Plan in accordance with Army Regulation 210-20 and the Army's Master Planning Technical Manual (MPTM). In addition to regulatory protection requirements, environmentally sensitive areas remain protected by mitigations identified in environmental assessments and in the 1991 BRAC ROD. In addition, the project-siting process on Fort Belvoir evaluates both compliance with land use designations and potential other issues with sites. Areas identified as sensitive (i.e., RPAs, wetlands) still retain their regulatory protections. See the response to Comment L1.4. Plans for bike trails not associated with BRAC actions are outside the scope of this EIS.			

Commenter	Comment #	Comment Type	Name
P21	P21.1	Other Organization	Philip Latasa
Section	Page Number	Organization	
Other		Friends of Accotink Creek	
Comment			
We are the Friends of Accotink Creek (www.accotink.org), a group of neighbors concerned about the well being of our local watershed. We have initiated projects to achieve that end, including stream monitoring, community cleanups, anti-dumping watch, and storm drain marking.			
Accotink Creek flows through the center of Fairfax County. It begins its journey in the City of Fairfax and flows southward to join the Potomac River at Fort Belvoir, passing through the Engineer Proving Grounds on the way. We endeavor to sustain the health of the entire length of this waterway, from origins to estuary.			
Much of the area being considered, though not pristine, is now relatively free of disturbance. Its wooded areas continue to provide refuge for native flora and fauna, forestall erosion, recharge our ground water, and perhaps nourish our spirits.			
The concerns we have are:			
<ul style="list-style-type: none"> - Reclassification of protected status lands, - Loss of tree cover, - Loss of native species habitat, - Further degradation of already stressed stream habitat and bank erosion due to siltation and permanently increased runoff, - Increased nutrient load in stream waters due to expanded fertilized lawns and landscaping, - Spread of invasive plant species both by habitat disturbance and use of non-native landscaping. 			
Response			
The Army shares these concerns. The Draft EIS appropriately evaluates these matters, as well as several others, with respect to biological and water resources, and identifies numerous best management practices that will reduce adverse effects on these resources. All actions will be compliant with the Endangered Species Act, the Clean Water Act, and other laws that protect the environment. See also the response to Comment L1.4.			

Commenter	Comment #	Comment Type	Name
P21	P21.2	Other Organization	Philip Latasa
Section	Page Number	Organization	
Other		Friends of Accotink Creek	
Comment			
<p>The Town Center is the best of the action alternatives in terms of acres impacted, but an option for high-density development of the GSA warehouse, an already paved-over location (also in the Accotink Creek watershed), would best address our concerns.</p> <p>Other concerns may be partly balanced by:</p> <ul style="list-style-type: none"> - Maximizing use of Low Impact Development (LID), - Designing to the U.S. Green Building Council's highest LEED rating, - Stream bank restoration/ sloping, - Stormwater detention and infiltration, - Storm drain screening/filtration, - Anti-litter screening on bridges, - Use of permeable paving in parking lots, trails, and sidewalks, - Maintaining and creating natural habitat corridors, - Preserving maximum existing tree cover during construction, - All-native replanting, - Increased funding of invasive species removal, - Acre for acre replacement of impacted natural resource areas, - Maintaining or reducing present stormwater runoff totals. 			
Response			
<p>Potential use of the GSA site is evaluated in the City Center Alternative. Regardless of the alternative for BRAC implementation the Army will select the best management practice such as those concerns in the comment will be considered to reduce adverse effects.</p>			

Commenter	Comment #	Comment Type	Name
P21	P21.3	Other Organization	Philip Latasa
Section	Page Number	Organization	
4.7 Water Resources		Friends of Accotink Creek	
Comment			
<p>This essay from our website expresses many of our concerns: Our streams are drowning. We are drowning them with inadequate water management. One of the major problems impairing the health of our streams is, ironically, water itself - a case of too much of a good thing.</p> <p>Flooding has become only partly an act of nature. Development has multiplied many times over the amount of impervious surfaces in our landscape. Even during routine rainstorms, runoff from roads, driveways, roofs, and parking lots rushes directly down storm drains into local streams, forcing them over their banks, carrying trash, fertilizer, and oil washed off streets and lawns. Natural surfaces with tree cover and sponge-like layers of leaf litter and humus used to allow much of this rainwater to evaporate or seep into groundwater. Now overwhelmed streams, forced to act as extensions of storm drains, result in destructive erosion of streambeds, silt washed downstream to the bay, creeping habitat degradation, and unnecessary flooding of man-made structures.</p> <p>And what happens after the rain? The water that once would have seeped slowly into the stream has already washed out to the bay. Many streams shrink to a trickle, a fraction of their historic steady flows.</p> <p>If building must take place, let it be an example of the best kind.</p>			
Response			
<p>BMPs would be incorporated as discussed in Section 4.7.2.4. Proposed mitigation plans are appropriate within the scope of the EIS. Identification of funding sources has not yet been made. The Army would comply with all relevant and applicable federal, state, and local requirements to help ensure the Army's proper stewardship of its resources.</p>			

Commenter	Comment #	Comment Type	Name
P22	P22.1	Private Citizen	Tracey Paddock
Section	Page Number	Organization	
Other			
Comment			
Please strongly consider implementing bike lanes and other bike commuter-friendly options on/around Fort Belvoir. If we are able to safely bike instead of drive to work, many of us will take that option helping to save the planet and lighten the gridlock.			
Response			
In determining the scope of the EIS, the Army did not include proposals for nonmotorized transportation measures. As circumstances warrant, the Army can in the future put forth proposals for alternatives to vehicular travel.			

Commenter	Comment #	Comment Type	Name
P23	P23.1	Private Citizen	Lee Schroeder
Section	Page Number	Organization	
4.8 Biological Resources			
Comment			
I have noticed that the Wood Turtle, a state endangered species, resides in the planned area to be disturbed. What is being doing to protect this animal ?			
Response			
According to the INRMP and Fort Belvoir staff, the wood turtle is established on the post along Accotink and Dogue Creeks. No projects, other than road and utility crossings, are planned to be located in creeks. All road and utility crossings would allow wildlife to pass through. Section 4.8.2.3.2 of the EIS discusses impacts to the wood turtle.			

Commenter	Comment #	Comment Type	Name
P23	P23.2	Private Citizen	Lee Schroeder
Section	Page Number	Organization	
4.8 Biological Resources			
Comment			
I have also noticed that the American Bald Eagle resides in the planned area to be disturbed. What is being done to protect this national symbol ?			
Response			
USFWS was consulted regarding the proposed action in January 2007. No response has been received. Nevertheless, Fort Belvoir and USFWS coordinate closely for all matters concerning listed species. Fort Belvoir has a bald eagle management plan, and the plan and federal limitations on activities near bald eagle nests, current and former, and activity areas are used to determine where projects that could potentially "harm" the species can be located, the types of projects that can be in bald eagle areas, and when the activities can take place. This same level of attention is being given to all BRAC projects that could potentially affect the bald eagle.			

Commenter	Comment #	Comment Type	Name
P23	P23.3	Private Citizen	Lee Schroeder
Section	Page Number	Organization	
4.9 Cultural Resources			
Comment			
There is a great danger of massive sprawl that the federal government will be encouraging. This sprawl will add much more undue pressures on our National Battlefields. What is being done to protect this? (Just 1 example that has been thwarted by citizen unrest was when Dominion Power announced that their power lines were going to slice through 2 Civil War Battlefields in Manassas. Could there be more citizen unrest to come ?) Our National Battlefields should not be compromised.			
Response			
Comment noted. Thank you for your interest. The Army's proposed action does not affect National Battlefields. Your comment will be made part of the administrative record of the action.			

Commenter	Comment #	Comment Type	Name
P23	P23.4	Private Citizen	Lee Schroeder
Section	Page Number	Organization	
Other			
Comment			
NGA has not come up with a telework plan for its worker bees or has not rearranged the workforce so MD people could use the telework plan. Shouldn't this be a priority?			
Response			
NGA officials are authorized to determine appropriate telework plans. Such planning, with respect to being located at Fort Belvoir, is within the decisionmaking authority of the NGA.			

Commenter	Comment #	Comment Type	Name
P23	P23.5	Private Citizen	Lee Schroeder
Section	Page Number	Organization	
Other			
Comment			
Is this mass move in the interest of "We The People ?" The phrase is printed on many of our \$10 to remind people.			
Response			
Force protection ensuring the safety of military and civilian employees is a high priority of the DoD. Members of the BRAC Commission, appointed by the President, gave due concern to force protection in recommending relocation of personnel to Fort Belvoir.			

Commenter	Comment #	Comment Type	Name
P23	P23.6	Private Citizen	Lee Schroeder
Section	Page Number	Organization	
Other			
Comment			
Wouldn't this money be better spent to care for the wounded soldiers, protect our borders, or secure our ports ?			
Response			
In its discretion, Congress allocates federal funding for many purposes, including BRAC, as well as those cited in the comment.			

Commenter	Comment #	Comment Type	Name
P24	P24.1	Private Citizen	Gail Gillespie
Section	Page Number	Organization	
4.3 Transportation		USMC	
Comment			
While I live in Springfield, as an Active Duty Marine, I frequently visit Ft. Belvoir for shopping needs, as well as for recreation (I love the nearby Nature Preserve, and just biking around post). Usually, I come by car, but sometimes I come on my bike.			
As you plan for the expansion of roads on and around Ft. Belvoir, I hope that you incorporate plans for bike use, both for commuting and recreation. Some plans I hope you will include are bike lanes on the entire length of Gunston Rd, to allow for safe crossing over Rt 1, and along Belvoir Rd, as well as having ample bike parking at main locations, such as the commissary, PX, fitness center, and office buildings. The roads approaching Ft. Belvoir could reduce some of the expected delays by having adequate bike lanes to encourage bike commuting. For folks living on or near post, cycling is an activity that can contribute to an individual's improved health, while helping to keep down pollution. If we make it safe and easy, the whole community can benefit. Thank you for your thoughtful consideration of these issues as you plan the upcoming changes in and around Ft. Belvoir.			
Response			
In determining the scope of the EIS, the Army did not include proposals for nonmotorized transportation measures. Fort Belvoir's upcoming Master Plan Update and associated NEPA documentation will provide information about the installation's trails and possible incorporation into regional trail systems.			

Commenter	Comment #	Comment Type	Name
P25	P25.1	Other Organization	Roger Diedrich
Section	Page Number	Organization	
Other		Great Falls Group, Sierra Club	
Comment			
There is no evidence that the DEIS considers effects from the contractors, family members and service sector that will necessarily accompany the 22,000 employees that will be added at Belvoir.			
Response			
Relocations to the Fort Belvoir area of contracting firms that support incoming units, agencies, and activities is both speculative and very difficult to estimate. The Army recognizes that some relocations might occur, but when such would occur or where the firms would take space cannot be estimated with enough certainty to enable traffic modeling or other types of analyses. As a general observation, it is noted that most such firms have multiple clients throughout the region and nationally; relocation by a firm to be close to only one of several clients may not be economically feasible or desirable from a firm's perspective.			

Commenter	Comment #	Comment Type	Name
P25	P25.2	Other Organization	Roger Diedrich
Section	Page Number	Organization	
Other		Great Falls Group, Sierra Club	
Comment			
The DEIS seriously understates and minimizes impacts. There are many natural features that are under stress in Fairfax County and the region, including: streams, the Potomac River, the Chesapeake Bay, air quality, tree cover, wetlands and open space. This means that even a small impact on a stressed system can cause major harm and there is little room for absorption. Not admitting the severity of the impacts seems to justify the lack of mitigation, in either action or financing.			
Response			
The Army does not agree that impacts have been understated or minimized. Impacts are characterized according to their context and intensity. Applying these criteria, analysts have used best professional judgment, which has been thoroughly vetted by Army reviews.			

Commenter	Comment #	Comment Type	Name
P25	P25.3	Other Organization	Roger Diedrich
Section	Page Number	Organization	
4.4 Air Quality		Great Falls Group, Sierra Club	
Comment			
The complete omission of a discussion of energy consumption and the consequent impact on global warming. The Army should recognize that not only are there broad environmental impacts from global warming, but that it has significant national security implications and finally, given its location, the prospect of rising oceans, the Bay and the Potomac would directly impact Belvoir.			
Response			
Many other sources of air emissions could change in response to the Proposed Action or alternatives. These can include the emissions from associated power generation. However, because the Army does not know the location of these other sources of emissions, they do not meet the definition of reasonably foreseeable or indirect emissions (40 CFR 93.152). Therefore, they were not included in the FEIS (40 CFR 93.153(c)(3)). In addition, addressing the effects of global warming on national security represents a level of detail unnecessary to adequately understand the relevant issues.			

Commenter	Comment #	Comment Type	Name
P25	P25.4	Other Organization	Roger Diedrich
Section	Page Number	Organization	
4.10 Socioeconomics		Great Falls Group, Sierra Club	
Comment			
<p>It is especially important that the impacts be properly evaluated, acknowledged and mitigated by the Army because as a federal facility, this major development is not subject to local ordinances and citizens are restricted from normal channels of grievance and protection. The other major development occurring in Fairfax County, the expansion of Tysons, is undergoing a full year of planning with citizen participation and a million dollars of consulting support. In contrast, the Army is doing little planning for Belvoir. Expanding on each of the numbered points above: The massive influx of employees into Belvoir will bring a large multiple of others, such as family members, contractors and many kinds of support personnel. For example, no mention is made of the additional schools and their employees or the buses that will be traversing the local roads to serve the families that will be part of the move. The claim that many of the people already live in the area is not well analyzed or presented. It is difficult to be more specific because not enough information is provided on the numbers of people making a move.</p>			
Response			
<p>The number of personnel affected by the proposed BRAC action are listed in Table 2-2 and are included in the analysis in the EIS. Distribution of current Fort Belvoir, WHS, NGA, and other DoD employees affected by the BRAC action are depicted in Figures 4.3-6, 4.3-17, and 4.3-18, analyzed in Section 4.10.2.1.2, and in Appendix G.2. The BRAC action is relocating offices that are in the metropolitan area, so it should be noted that people currently reside in the DC Metro area. It was assumed that the 50 percent of BRAC employees will follow Fort Belvoir distribution. This BRAC action has been and continues to be the subject of an extensive and long planning process.</p>			

Commenter	Comment #	Comment Type	Name
P25	P25.5	Other Organization	Roger Diedrich
Section	Page Number	Organization	
4.4 Air Quality		Great Falls Group, Sierra Club	
Comment			
<p>An example of a dismissal of an impact is the treatment of air quality. The DEIS makes no acknowledgement of the fact that the Council of Governments must make a determination via a conformity analysis of this activity. The emissions of all criteria pollutants (CO, NO₂, SO₂, PM₁₀, PM_{2.5}, Lead and, possibly, O₃) must be modeled to prove that the project will not “cause or contribute to any new violation of any standard” or “increase the frequency or severity of any existing violation of any standard in any area. The DEIS makes the simplistic claim that because there will be a decrease of people in the region, the impact is minimal, but that assertion is not established. In order for there to be a net reduction of people in the region following the movement of 22,000 people to Ft. Belvoir, one would have to believe that the space the people left would remain vacant indefinitely, an absurd notion. In addition, localized impacts of emissions which are independent of the regional effects, such as air toxics and particulates, need to be analyzed.</p>			
Response			
<p>It is the Army's, not MWCOG's, responsibility to demonstrate conformity for the BRAC action at Fort Belvoir. The draft general conformity determination was prepared and included in the draft EIS and is included in Appendix E of this Final EIS for reference purposes. The Army is continuing to work with the Commonwealth of Virginia to identify mitigation measures required to conform. The concepts being agreed to include using a developable land calculation in apportioning the SIP inventory data, specifying the enforcement inspection and penalty clauses to be used to monitor mitigation measures during construction, including mitigation measures such as limiting construction on ozone action days, meeting new engine standards for non-road equipment, equipment substitutions, diesel retrofitting, anti-idling restrictions, and the use of alternative fuels. Potential mitigation measures are included in the EIS in Section 4.4.2.3. The Army must make available its final conformity determination, and will do so once it is completed. Information on these mitigations will be included in the ROD.</p> <p>In addition, the Army has confirmed with MWCOG that the latest planning assumptions associated with the Belvoir BRAC action will be included in the Round 7.1 cooperative forecast for the region. The Army will continue to coordinate with VDEQ and MWCOG to ensure the latest planning assumptions associated with the BRAC within the region are available.</p> <p>Many other sources of air emissions may change in response to the action. These may include the emissions for the previously occupied leased facilities. However, because the Army does not maintain an ongoing program of control over these emissions they do not meet the definition of indirect emissions (40 CFR 93.152). Therefore, they were not included in the FEIS (40 CFR 93.153(c)(3)).</p> <p>Information on mobile sources of air emissions appear in Section 4.4.2.2.2 and Appendix E.1, Section 3.1.3.2 and 3.1.1.2. Issues relating to ozone, PM_{2.5} and air toxics were addressed.</p>			

Commenter	Comment #	Comment Type	Name
P25	P25.6	Other Organization	Roger Diedrich
Section	Page Number	Organization	
4.7 Water Resources		Great Falls Group, Sierra Club	
Comment			
<p>Another example of this dismissive posture appears with water quality. The DEIS finds on page 4-217 that seven sub-watersheds already exceed the 25 percent impervious threshold for clean streams. In spite of this, the DEIS offers no mitigation for all the additional impact the expansion will cause, other than a possible study of a stormwater drainage system. There is little indication of coordination with Fairfax County stormwater managers. Finally, we are concerned about the decision to eliminate “Environmentally Sensitive” as a land use designation. Clearly there is significant acreage on Belvoir that would warrant such a classification.</p>			
Response			
<p>As stated in the response to Comment L15.3, BMPs would be incorporated as discussed in Section 4.7. Proposed mitigation plans are appropriate within the scope of the EIS. Identification of funding sources is not available. The Army would comply with all relevant and applicable federal, state, and local requirements to help ensure the Army’s proper stewardship of its resources. Fort Belvoir complies with all relevant and applicable laws protective of the environment. As stated in the response to Comment P18.4, eliminating the environmentally sensitive land use classification does not affect the degree of careful consideration that applies to all development projects, whether they are minor or major.</p>			

Commenter	Comment #	Comment Type	Name
P25	P25.7	Other Organization	Roger Diedrich
Section	Page Number	Organization	
Other		Great Falls Group, Sierra Club	
Comment			
<p>To ignore global warming impacts is a major oversight and weakness of the DEIS. Planners for the BRAC expansion should review all aspects of their plan through the lens of the impact on global warming. A recent study, "National Security and the Threat of Climate Change." By CNA Corp, (http://securityandclimate.cna.org/), with a military advisory board of 11 Admirals and Generals, should not have missed the notice of the US Army. The first recommendation on page 9 of the report states that the "national security consequences of climate change should be fully integrated into national security and national defense strategies". Because there is nothing on this topic in the DEIS to respond to, here are some considerations that a responsible plan for Belvoir could incorporate to begin to address this issue.</p> <p>a) Arrange the pattern of structures compactly to reduce construction and to facilitate the use of transit rather than cars. This will nicely complement the need to maintain security buffers because a cluster of buildings will require less buffer area than the same capacity dispersed.</p> <p>b) Add more employee housing on the base so as to lower the jobs/housing balance and raise the internal capture rate of trips. The J/H ratio on base of the DEIS preferred option is about 3 and a good goal would be below 2.</p> <p>c) Maximize the use of transit through an aggressive TDM program. The goal of a transit share of 5-10 % may be realistic for 2011, but there needs to be a plan to raise the share to 20, even 30 % over the next 10-15 years. There are many steps that can help implement that, including a more sincere effort to work with local government toward solutions. The DEIS says a transportation demand manager is a possibility, but it is a necessity for one or more. The Army needs to provide support to extend the Metro Blue line to the EPG and eventually, the Yellow line to the Base. Placing the WHS facility at the GSA site will make the Blue line extension more meaningful and reduce auto trips. Include a good feeder bus system on base. Reduce the amount of parking to save space, money and discourage drivers.</p> <p>d) Build a complete bike system network, with trails throughout the base, and covered bike stations at all major destinations. Consider providing free bicycles for employees on base, possibly with an electronic check-out system. Hire a bike coordinator.</p> <p>e) Make all buildings LEED Silver certified or equivalent.</p> <p>f) Purchase fuel efficient vehicles, even some electric vehicles, at every possibility. Discourage idling of vehicles and heavy equipment.</p> <p>g) Base facilities undoubtedly will consume substantial amounts of electrical power and other fuels, perhaps natural gas as well as motor fuels. That will result in additional strains on the regions' energy systems, especially the electrical grid, and probably require additional electrical and natural gas transmission/distribution lines with their associated environmental and aesthetic impacts on the region. The consumption of power and fossil fuels will add to regional air pollution, greenhouse gases and pressure for offshore drilling.</p> <p>Those impacts could be greatly mitigated if the new facilities were to include their own on-site power generation, heating and cooling facilities, especially if those facilities utilized clean renewable energy. Solar energy could provide electrical power, heating, and cooling services. Solar and wind energy could be combined with other sources such as microturbines into a local "microgrid" that would provide 24/7 electrical power as well as heating and cooling ("combined heat and power" or CHP) at each base or even in individual buildings. CHP is inherently more energy efficient even when based in part on fossil fuels, decreasing net greenhouse gas and pollutant emissions and fossil fuel resource consumption. Microgrid configurations would make the base and facilities more independent and resilient in the event of an interruption of fuel or electricity thus increasing security. Modern microgrid controls also contribute to the overall stability and reliability of the regional electrical grid. When combined with renewable sources such as solar and wind, the microgrid greatly reduces air pollution and greenhouse gas emissions. The DEIS should identify microgrid on-site power generation as an alternative that would mitigate adverse impacts on the region.</p>			
Response			
<p>The Army and its planning agent, Belvoir New Vision Planners, appreciates the recommendations contained in the comment. These matters, and many more like them, will be incorporated into BRAC implementation to the extent feasible. The Army will incorporate the recent Executive Order 13423 (Strengthening Federal Environmental, Energy, and Transportation Management) into planning for and implementation of BRAC.</p>			

Commenter	Comment #	Comment Type	Name
P26	P26.1	Private Citizen	C. Flint Webb
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
<p>My comments can be summed up that this project should not be allowed to go forward due to serious deficiencies in the General Conformity Determination. The applicable General Conformity Regulation (40 CFR 93 Subpart B) (the wrong regulation was stated in the subject document) states:</p> <p>No department, agency or instrumentality of the Federal Government shall engage in, support in any way or provide financial assistance for licenses or permit, or approve any activity which does not conform to an applicable implementation plan.</p> <p>Since the Washington Metropolitan Area has been designated as nonattainment of the 8-hour ozone and annual PM2.5 National Ambient Air Quality Standards, no SIPs have been approved by EPA for these pollutants, and the estimated emissions are above the precursors de minimis emission thresholds for both these standards. Therefore, the project can not go forward without the provisions of 40 CFR 93 Subpart B being strictly adhered to. Specific deficiencies are explained in more detail in the accompanying detailed comments but the deficiencies amount to:</p> <ol style="list-style-type: none"> 1. The emissions of all criteria emissions (CO, NO2, SO2, PM10, PM2.5, Lead and, in my opinion, O3) must be modeled to prove that the project will not "cause or contribute to any new violation of any standard" or "increase the frequency or severity of any existing violation of any standard in any area". 2. The emissions did not include many indirect emissions from, for instance to name just a couple, contractors or added electrical usage. 3. The emissions have not been offset by contemporaneous reductions in emissions at other sources in the nonattainment area. 4. The required certifications that must be made by COG and the Governor of Virginia were not included. <p>These deficiencies could have been addressed if the emissions budgets had been included in the 8-hour ozone SIP currently going through public comment but the Army did not participate in the process. The only way do resolve the issue now and continue with the project would be to fully offset the anticipated emission increases by purchasing emission reduction credits (which I do not think exist in the Washington Metropolitan Area) and model the resulting emissions to ensure that no NAAQS will be exceeded in the surrounding community. Even though there are no readily available emission reduction credits in the nonattainment area, the Army may be able to satisfy this requirement by reducing mobile source emissions - possibly by subsidizing mass transit (i.e., providing funds to WMATA or VRE to encourage the use of mass transit).</p>			
Response			
<p>The draft general conformity determination was prepared and included in the draft EIS and is included in Appendix E of this Final EIS for reference purposes. The Army is continuing to work with the Commonwealth of Virginia to identify mitigation measures required to conform. The concepts being agreed to include using a developable land calculation in apportioning the SIP inventory data, specifying the enforcement inspection and penalty clauses to be used to monitor mitigation measures during construction, including mitigation measures such as limiting construction on ozone action days, meeting new engine standards for non-road equipment, equipment substitutions, diesel retrofitting, anti-idling restrictions, and the use of alternative fuels. Potential mitigation measures are included in the EIS in Section 4.4.2.3. The Army must make public its Clean Air Act conformity determination by placing a notice by prominent advertisement in a daily newspaper of general circulation in the area affected by the action, and will do so once it is completed. Information on these mitigations will be included in the ROD.</p>			

Commenter	Comment #	Comment Type	Name
P26	P26.2	Private Citizen	C. Flint Webb
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
<p>Section 1.0, 1st Paragraph, last sentence: The wrong regulation is cited. Since there is no SIP in place the applicable General Conformity Regulation is 40 CFR 93. 40 CFR 51 should only be used when an approved SIP is in place. Quoting from FR 63213, Determining Conformity of General Federal Actions to State and Federal Implementation Plans; Final Rule:</p> <p>In addition, the rule adds a new subpart B to part 93 of title 40 of the Code of Federal Regulations. This is necessary to make the conformity requirements apply to Federal agencies as soon as the rule is effective and in the interim period before the States revise their implementation plans.</p> <p>Since neither the PM2.5 or the 8-hour O3 SIPs have been approved by EPA this 40 CFR 93 is the applicable regulation not 40 CFR 51. It is worthwhile to compare the O3 precursor emissions with the emissions budgets from the approved 1-hour O3 for determining whether the Action is Regionally Significant and it would be informative to the public to compare project emissions to the emission budgets in the proposed 8-hour O3 SIP, but the 8-hour O3 National Ambient Air Quality Standard.</p> <p>The main difference with these two regulations is that for 40 CFR 93 there is that if the emissions are over the de minimis thresholds the only options would be:</p> <ol style="list-style-type: none"> 1. The emissions for the Action are "... specifically identified and accounted for in the applicable SIP's attainment or maintenance demonstration" (40 CFR 93.158(a)(1)). The direct and indirect emissions are not identified in the Draft 8-hour O3 SIP, and the PM2.5 has not been developed yet. 2. Fully offset the emissions. There has been no attempt to offset the emission increases of this project. Since the project is a General Conformity project it would be possible to offset mobile source emissions by, for instance, contributing to the Washington Metropolitan Area Transit Authority (WMATA) to reduce fares and encourage increased ridership. 3. Demonstrate that: <ol style="list-style-type: none"> i. The non-ozone precursor emissions do not "cause or contribute to any new violation of any standard" and will not "increase the frequency or severity of any existing violation of any standard in any area" (40 CFR 93.158(b)(2) referred to in 40 CFR 93.158(a)(3)(i)) [emphasis added]. This would require the Army to demonstrate that the direct and indirect emissions from the BRAC action will not cause a violation of the CO, SO2, NO2, Lead, and PM10 standard as well as the PM2.5 standard to demonstrate that the BRAC action will not cause a violation of, or increase the frequency or severity of existing violations of these standards. When the regulations were originally promulgated in 1993 the state of ozone modeling was not as advanced as it is today and it would be of public benefit to not only model for the other pollutants but also for ozone. Since the Virginia DEQ has been performing extensive ozone modeling of the area it should be possible to use the model inputs from DEQ and add in new emissions from the proposed BRAC action demonstrate that the proposed action will not "increase the frequency or severity" of violations of the 8-hour O3 NAAQS. <p>And</p> <ol style="list-style-type: none"> ii. Virginia direct and indirect emissions will "result in a level of emissions which, together with all other emissions in the nonattainment ... area, would not exceed the emissions budgets specified in the applicable SIP" (40 CFR 93.158(a)(5)(A)) and "... [are] determined by the [Virginia Department of Environmental Quality], would exceed an emissions budget specified in the applicable SIP and the [Virginia] Governor or the Governor's designee for SIP actions makes a written commitment to EPA which includes ... (1) A specific schedule for adoption and submittal of a revision to the SIP which would achieve the needed emission reductions prior to the time emissions from the [proposed BRAC action] would occur; (2) Identification of specific measures for incorporation into the SIP which would result in a level of emissions which, ... would not exceed any emissions; (3) A determination that all existing applicable SIP requirements are being implemented in the area for the pollutants affected by the [proposed BRAC action], and that local authority to implement additional requirements has been fully pursued; (4) A determination that the [Army] have required all reasonable mitigation measures associated with their action; and (5) Written documentation including all air quality analysis supporting the conformity determination" (40 CFR 93.158(a)(5)(B)) such a letter would require the revision of the SIP within the next 18 months. Since Virginia has just completed the preparation of a SIP that did not include these determinations it is unlikely that Virginia will be willing to make such a determination. iii. The COG determines that the BRAC action "is specifically included in a current transportation plan and transportation improvement program which have been found to conform to the applicable SIP under 40 CFR 51 subpart T or 40 CFR 93 subpart A" (40 CFR 93.158(a)(5)(ii) referred to from 93.158(a)(3)(ii)). This would mean that COG would have had to include the emissions from the proposed BRAC action in the most recent transportation conformity determination - which they have not. However, the next transportation conformity analysis is expected to include the BRAC action. The project therefore can not be approved until the next transportation conformity determination has been made. 			
Response			
<p>The draft general conformity determination was prepared and included in the draft EIS and is included in Appendix E of this Final EIS for reference purposes. The Army is continuing to work with the Commonwealth of Virginia to identify mitigation measures required to conform. The concepts being agreed to include using a developable land calculation in apportioning the SIP inventory data, specifying the enforcement inspection and penalty clauses to be used to monitor mitigation measures during construction, including mitigation measures such as limiting construction on ozone action days, meeting new engine standards for non-road equipment, equipment substitutions, diesel retrofitting, anti-idling restrictions, and the use of alternative fuels. Potential mitigation measures are included in the EIS in Section 4.4.2.3. The Army must make available its final conformity determination, and will do so once it is completed. Information on these mitigations will be included in the ROD.</p>			

Commenter	Comment #	Comment Type	Name
P26	P26.3	Private Citizen	C. Flint Webb
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
Section 3.0, 2nd paragraph after Table 3-1, 2nd sentence: Reference is made to "guidance issued by EPA." You need to include the reference.			
Response			
Thank you for the comment. The EPA reference is included after the following sentence referred to in the comment.			

Commenter	Comment #	Comment Type	Name
P26	P26.4	Private Citizen	C. Flint Webb
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
Section 3.1, 2nd paragraph, 3rd sentence: The emission estimates must be for the proposed alternative. It is not appropriate to simply state that there would be "Slight variation in the siting of the new facilities on Fort Belvoir would not change the emissions". The proposed action includes construction activities at EPG as well as Fort Belvoir. The statement does not address options that would include EPG.			
Section 3.1, 3rd paragraph and Section 3.1.3 1st paragraph: It is correct that Major Source New Source Review (NSR) (i.e. Prevention of Significant Deterioration (PSD) or projects that would require Lowest Achievable Emission Rate (LAER)) are exempt from General Conformity, but minor source emissions such as emergency generators and space heaters are not exempt from General Conformity.			
Response			
The information provided in your comment will be added to the final GCD. A state-issued permit will demonstrate that emissions from minor point sources are included in the SIP.			

Commenter	Comment #	Comment Type	Name
P26	P26.5	Private Citizen	C. Flint Webb
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
Section 3.1.1.1: No reference to how the list of equipment was developed or how long it will be used is given. Please expand in the text and provide a complete list of equipment for each project in the appendix.			
Response			
Assumptions on equipment use were based on R.S. Means construction data and experience with similar projects.			

Commenter	Comment #	Comment Type	Name
P26	P26.6	Private Citizen	C. Flint Webb
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
Section 3.1.1.2, 1st paragraph: The EIS states that some parameters were provided by COG. Please be specific - which parameters were provided by COG.			
Section 3.1.1.2, 1st paragraph: The emission estimates only accounted for worker commuting on base. Unless you are planning to provide housing for the workers at the base gate, the direct and indirect emissions would include workers commuting from home to the front gate. They also need to be included in the traffic studies.			
Response			
Section 3.1.1.2 of the final GCD will be updated based on the comment. Construction workers' commuting activities off the installation are not under the control of the Army. Therefore, they were not considered. However, DoD employees and associated embedded contractors were accounted for in their entire commutes both on- and off-post.			

Commenter	Comment #	Comment Type	Name
P26	P26.7	Private Citizen	C. Flint Webb
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
Section 3.1.1.3: The assumption is made that the painted area would equal the twice the floor area. This would appear to be reasonable for large rooms approximately 32 ft on a side but would appear to under predict the surface area for smaller more intimate rooms. What is the basis of this assumption?			
Section 3.1.1.3, Table 3-5: Please provide the heated area used in making the assumption for each year. This will allow for better review of the document to ensure consistency with other analyses. The information is provided in the appendix, but it should be included in the text.			
Response			
This assumption is constant with procedures outlined in the South Coast Air Quality Management District - CEQ Air Quality Handbook. Information on matters outlined in the comment appear in Appendix E.1 Table A1-3.			

Commenter	Comment #	Comment Type	Name
P26	P26.8	Private Citizen	C. Flint Webb
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
Section 3.1.1.4, Table 3-6: The table should include the paved area for each year.			
Response			
Information on matters outlined in the comment appear in Appendix E-1 Table A1-4.			

Commenter	Comment #	Comment Type	Name
P26	P26.9	Private Citizen	C. Flint Webb
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
Section 3.1.1.5, 1st paragraph: What is the basis of the 50% capture factor? Is this based on Best Management Practices? The practices that the Army will be utilizing need to be stated here and in the ROD.			
Section 3.1.1.5: It appears that demolition emissions are not included in the analysis. Will there be no demolition? If there is any demolition the emissions need to be included in the analysis.			
Response			
The capture fraction was determine using procedures outlined in Methodology to Estimate the Transportable Fraction (TF) of Fugitive Dust Emissions for Regional and Urban Scale Air Quality Analyses (USEPA 2005c). Demolition emissions were included in the analysis and are outlined in Appendix 1 of the General Conformity Determination in Appendix E of the EIS.			

Commenter	Comment #	Comment Type	Name
P26	P26.10	Private Citizen	C. Flint Webb
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
Section 3.1.1.5, Table 3-7: Please include the disturbed area for each year in the table.			
Response			
Information on matters outlined in the comment appear in Appendix E.1 Table A1-5.			

Commenter	Comment #	Comment Type	Name
P26	P26.11	Private Citizen	C. Flint Webb
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
Section 3.1.3: Indirect emissions should also include the emissions associated with the increased electrical power generation needs. The appendix of the draft SIP includes an analysis of the power generating emissions that would be affect the Washington DC Nonattainment Area.			
Response			
Many other sources of air emissions can change in response to the proposed action or alternatives. These could include the emissions cited in the comment. However, because the Army does not know the location of these other emissions, they do not meet the definition of reasonably foreseeable or indirect emissions (40 CFR 93.152). Therefore, they were not included in the conformity determination or EIS (40 CFR 93.153(c)(3)).			

Commenter	Comment #	Comment Type	Name
P26	P26.12	Private Citizen	C. Flint Webb
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
Section 3.1.3.1, 2nd paragraph: The heating equipment for the larger projects may be subject to permitting requirements, but I doubt that they will be subject to Major Source NSR or PSD therefore they need to be considered in the General Conformity Analysis. All combustion sources will need to be considered in the general conformity analysis unless the emissions will be over the Major Source NSR or PSD requirements. In both cases sources that are subject to Major Source NSR and PSD will go through notice and comment and therefore need not be considered in this notice and comment period except to mention that they will be subject to future notice and comment. Major Source NSR sources will also be required to employ Lowest Achievable Emission Rate (LAER) controls.			
Section 3.1.3.1, 3rd paragraph: Will the only fuel used on the facility be natural gas? Does that include emergency generators?			
Section 3.1.3.1, 4th paragraph: The units are confusing (ft2 heated area, ft3 of natural gas, lb of what pollutant ...). Like units should clearly cancel.			
Response			
The information provided in the comment will be added to the final GCD when it is made available. A state-issued permit demonstrates that emissions from minor point sources are included in the SIP. Additional text will be added to Section 3.1.3.1 of the final GCD to clarify the emissions calculation example.			

Commenter	Comment #	Comment Type	Name
P26	P26.13	Private Citizen	C. Flint Webb
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
Section 3.1.3.1, Table 3-9: Please include square feet of heated space for each year in the table.			
Response			
Information on matters outlined in the comment appear in Appendix E.1 Table A1-3.			

Commenter	Comment #	Comment Type	Name
P26	P26.14	Private Citizen	C. Flint Webb
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
Section 3.1.3.2, 1st paragraph: It is not clear which parameters are from COG and which parameters are assumed in the Mobile6.2 model.			
Response			
Thank you for the comment. Section 3.1.3.2 of the final GCD will be updated based on the comment.			

Commenter	Comment #	Comment Type	Name
P26	P26.15	Private Citizen	C. Flint Webb
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
<p>Section 3.1.3.1, 1st paragraph: It is assumed that the average commuting distance is 20 miles. This seems incredibly low especially since the average on-base commuting distance given in section 3.1.1.2 was 35 miles. At a minimum the distance should be 35 miles and that would require that all 22,000 new workers would be housed on base (not likely).</p> <p>Section 3.1.3.1: In addition to the direct employees since indirect emissions must be included in the General Conformity you need to include both embedded and transient contractors and concession workers. I suggest you use the number of entries per year per direct employee as an indication of the number of commuters times the ratio of new direct employees and current direct employees.</p>			
Response			
<p>Appendix E.1 Section 3.1.3.1 outlines a sample calculation to better reflect the actual net changes in commuting distance. The results are presented in Appendix E.1 Table A1-7. DoD employees and associated embedded contractors were accounted for in their entire commutes both on and off-post. Many other sources of air emissions may change in response to the proposed action or alternatives. These may include the emissions cited in the comment. However, because the Army does not know the location of these other emissions they do not meet the definition of reasonably foreseeable or indirect emissions (40 CFR 93.152). Therefore, they were not included in the conformity determination or EIS (40 CFR 93.153(c)(3)). Since the BRAC action at Fort Belvoir does constitute a net decrease in personnel in the region, it is anticipated that these sources of air emissions- including concession workers activities-would decrease as well.</p>			

Commenter	Comment #	Comment Type	Name
P26	P26.16	Private Citizen	C. Flint Webb
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
<p>Section 3.1.3.2, Table 3-10: It is not credible that an increase of 22,000 employees would lead to a decrease in emissions. You should include the expected emissions from all new direct employees and indirect employees and the current emissions for all direct and indirect employees where the workers are currently stationed. Once both current and future emissions are quantified it would be appropriate to subtract the current emissions from the projected future emissions but the analysis must take into consideration any mass transit commuting that the workers and contractors are currently utilizing. This analysis did not include enough information in either the text or the appendix to check for adequacy.</p>			
Response			
<p>Information available to the Army has been verified as accurate. Table 4.3-17 in Section 4.3.4.2.1 of the EIS has been added to demonstrate a reduction in vehicle miles traveled. Information on mobile sources of air emissions appear in Section 4.4.2.2.2 and Appendix E.1 Section 3.1.1.2 and 3.1.3.2. DoD employees and associated embedded contractors and their entire commutes both on and off-post were accounted for in the EIS.</p>			

Commenter	Comment #	Comment Type	Name
P26	P26.17	Private Citizen	C. Flint Webb
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
<p>Section 3.2, Table 3-12: In addition to NOx, and SO2 emissions VOC and ammonia emissions should be addressed with respect to the PM2.5 Conformity Applicability Analysis since they too could be PM2.5 precursors.</p> <p>Section 3.2: Since the proposed BRAC action is over the de minimis threshold for in the PM2.5 General Conformity Applicability Analysis the emissions will need to be offset since there is no SIP.</p>			
Response			
<p>Neither VOCs nor ammonia have been identified as precursors of concern for PM2.5 in the region. Therefore, they were not included for detailed analysis.</p> <p>The draft general conformity determination was prepared and included in the draft EIS and is included in Appendix E of this Final EIS for reference purposes. The Army is continuing to work with the Commonwealth of Virginia to identify mitigation measures required to conform. The concepts being agreed to include using a developable land calculation in apportioning the SIP inventory data, specifying the enforcement inspection and penalty clauses to be used to monitor mitigation measures during construction, including mitigation measures such as limiting construction on ozone action days, meeting new engine standards for non-road equipment, equipment substitutions, diesel retrofitting, anti-idling restrictions, and the use of alternative fuels. Potential mitigation measures are included in the EIS in Section 4.4.2.3. The Army must make available its final conformity determination, and will do so once it is completed. Information on these mitigations will be included in the ROD.</p>			

Commenter	Comment #	Comment Type	Name
P26	P26.18	Private Citizen	C. Flint Webb
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
<p>Section 3.3.1, 3rd paragraph: The 8-hour O3 SIP has been approved by the MWAQC so the emissions in the proposed 8-hour O3 SIP needs to be used for determining regional significance.</p> <p>Section 3.3.1, Table 3-14: It is not clear how many days were assumed for converting from annual emissions to daily emissions. Since much of the emissions are construction related, and construction can not take place year-round it is not proper to simply divide by the number of days per year to determine the ozone season daily emissions and in fact it is reasonable to expect that most if not all the construction activity will take place during the ozone season.</p>			
Response			
<p>Information on matters raised in the comment appears in Section 3.2. Information available to the Army has been verified as accurate. For consistency, daily construction emissions were estimated first and then converted to annual estimates.</p>			

Commenter	Comment #	Comment Type	Name
P26	P26.19	Private Citizen	C. Flint Webb
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
<p>Section 3.3.2.1, 1st paragraph: The emissions should at least be compared to the MWAQC approved 8-hour ozone SIP.</p> <p>Section 3.3.2.1, 2nd paragraph, last sentence: This sentence needs to be revised to reflect that the 8-hour SIP has been approved by MWAQC.</p> <p>Section 3.3.2.1, 3rd paragraph: Emissions should be compared to the 2002 base year emissions. The 2002 8-hour ozone precursor emissions budget have been submitted to the EPA (and amended in the draft 8-hour ozone SIP) and should be used rather than the referenced 1990 emission budget.</p>			
Response			
<p>Information on matters raised in the comment appears in Section 3.3.2.2. Information available to the Army has been verified as accurate. The 8-hour SIP has not yet received final approval at either the regional or EPA level. The matter raised in the comment represents a level of detail unnecessary to adequately understand relevant issues. Information available to the Army has been verified as accurate. The U.S. Army has no control over which baseline budget is used in the development of the either the 1-hour or 8-hour ozone SIP.</p>			

Commenter	Comment #	Comment Type	Name
P26	P26.20	Private Citizen	C. Flint Webb
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
Section 3.3.2.3, 1st paragraph after Table 3-18: Just because the emissions are considered small doesn't preclude the BRAC action proponent from offsetting the emission increases 100%.			
Section 3.3.2.3, 2nd paragraph after Table 3-18: The analysis needs to be based on the Fort Belvoir BRAC action on-road emissions not the regional emissions for BRAC as a whole; each facility affected by BRAC must be considered separately - especially in a situation like this where the BRAC actions cover more than one state.			
Response			
The final GCD analysis will be based on the proposed action of implementation of BRAC at Fort Belvoir. The draft GCD was prepared and included in the draft EIS and is included in Appendix E of this Final EIS for reference purposes. The Army is continuing to work with the Commonwealth of Virginia to identify mitigation measures required to conform. The concepts being agreed to include using a developable land calculation in apportioning the SIP inventory data, specifying the enforcement inspection and penalty clauses to be used to monitor mitigation measures during construction, including mitigation measures such as limiting construction on ozone action days, meeting new engine standards for non-road equipment, equipment substitutions, diesel retrofitting, anti-idling restrictions, and the use of alternative fuels. Potential mitigation measures are included in the EIS in Section 4.4.2.3. The Army must make available its final conformity determination, and will do so once it is completed. Information on these mitigations will be included in the ROD.			

Commenter	Comment #	Comment Type	Name
P26	P26.21	Private Citizen	C. Flint Webb
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
Section 3.3.3, 3rd paragraph: In addition to direct employees the analysis is required to include indirect emissions, and this means that it needs to include the emissions associated with contractors.			
Response			
DoD employees and associated embedded contractors and their entire commutes both on and off-post were accounted for in the section identified in the comment.			

Commenter	Comment #	Comment Type	Name
P26	P26.22	Private Citizen	C. Flint Webb
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
Section 3.4, 1st paragraph: As mentioned earlier the applicable regulation is not 40 CFR 51 but 40 CFR 93.			
Response			
The Army will adopt the information provided in the comment regarding the mis-cited regulation in the final GCD.			

Commenter	Comment #	Comment Type	Name
P26	P26.23	Private Citizen	C. Flint Webb
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
Section 3.4, 4th paragraph: 1st bullet: The statement is not correct since the NOx emissions are above the de minimis threshold for both the ozone and PM2.5 NAAQS. 2nd bullet: The statement is meaningless since the 1-hour ozone NAAQS has been replaced. 3rd bullet: The statement is meaningless since it is not a General Conformity test.			
Response			
The draft general conformity determination was prepared and included in the draft EIS and is included in Appendix E of this Final EIS for reference purposes. The Army is continuing to work with the Commonwealth of Virginia to identify mitigation measures required to conform. The concepts being agreed to include using a developable land calculation in apportioning the SIP inventory data, specifying the enforcement inspection and penalty clauses to be used to monitor mitigation measures during construction, including mitigation measures such as limiting construction on ozone action days, meeting new engine standards for non-road equipment, equipment substitutions, diesel retrofitting, anti-idling restrictions, and the use of alternative fuels. Potential mitigation measures are included in the EIS in Section 4.4.2.3. The Army must make available its final conformity determination, and will do so once it is completed. Information on these mitigations will be included in the ROD.			

Commenter	Comment #	Comment Type	Name
P26	P26.24	Private Citizen	C. Flint Webb
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
Appendix Table A1-1: There needs to be a list of the equipment for each project, the number of days the project take, and the percentage of the time the equipment is operated during the day.			
Response			
Thank you for the comment. Assumptions on equipment use were based on R.S. Means construction data and experience with similar projects.			

Commenter	Comment #	Comment Type	Name
P26	P26.25	Private Citizen	C. Flint Webb
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
Appendix Table A1-5: The number of days of the project needs to be included and the fugitive emissions from land clearing will take place not only when the land is actively worked but also at night and on weekends when the land is not actively worked. Please include soil properties.			
Response			
The number of days for the grading phase of the project was included and fugitive emissions for the entire period was accounted for. Soil property information requested in the comment represents a level of detail unnecessary to adequately understand relevant issues.			

Commenter	Comment #	Comment Type	Name
P26	P26.26	Private Citizen	C. Flint Webb
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
Appendix E.1 Table A1-7: The number of employees do not match up with other analyses and clearly does not include contractors and vendors; these need to be included as indirect emissions.			
Response			
The number of new personnel is consistent with the description of proposed action and alternatives in the EIS. DoD employees and associated embedded contractors and their entire commutes both on and off-post were accounted for in the EIS. The Army does not maintain a continuing program of control over many emissions sources, especially those off-post. Therefore, they were not included in the draft GCD or proposed action in the EIS. However, since the BRAC action at Fort Belvoir does constitute a net decrease in personnel in the region, it is anticipated that these sources of air emissions, including vendor activities would decrease as well.			

Commenter	Comment #	Comment Type	Name
P26	P26.27	Private Citizen	C. Flint Webb
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
Appendix Preferred Alternative - Stationary Source Emissions: For reference purposes it would be informative to include the current stationary source emissions from the facility. I believe the figures are included in the 2002 baseline emissions included in the 8-hour SIP.			
Response			
The matter raised represents a level of detail unnecessary to adequately understand relevant issues.			

Commenter	Comment #	Comment Type	Name
P27	P27.1	Private Citizen	Sallie Lyons
Section	Page Number	Organization	
4.9 Cultural Resources			
Comment			
The Cultural Resources assessment is so severely deficient as to pose a threat to the resources that the process was created to protect. Archaeological and historical resources must be identified, investigated and made accessible to the site selection process before decisions and development plans are made. This information must inform the selection and design processes rather than be an afterthought when buildings are to be demolished and archaeological sites destroyed in the process of construction.			
Response			
Army planning duly takes into account potential adverse effects of cultural resources and provides for appropriate mitigation with respect to specific actions. Your comment will be made part of the administrative record of the action.			

Commenter	Comment #	Comment Type	Name
P27	P27.2	Private Citizen	Sallie Lyons
Section	Page Number	Organization	
4.9 Cultural Resources			
Comment			
Archaeological analysis and plans for mitigation are particularly weak in the draft EIS. Understanding that location of specific sites can not be made public because of their vulnerability, still greater specificity is in order for sites mentioned as being directly impacted. What is their nature, and how would they be impacted? If sites are endangered what is to be the mitigation? In the case of areas known to have high archaeological potential, what levels of survey and recovery would be planned? There is no discussion at all of how impacts would be mitigated. Preferred mitigation procedures must be included in the document.			
Response			
The matter raised represents a level of detail unnecessary to adequately understand relevant issues. The EIS provides adequate information on the status of the historic properties within and surrounding Fort Belvoir needed to present a preliminary analysis of potential effects to these properties. Detailed assessment of effect would be conducted during the Section 106 consultation process for the proposed undertakings.			

Commenter	Comment #	Comment Type	Name
P27	P27.3	Private Citizen	Sallie Lyons
Section	Page Number	Organization	
4.9 Cultural Resources			
Comment			
<p>I find it totally unbelievable that any sort of credible archaeological survey could have been done at the EPG and produce only one artifact. In the rich riverine environment of southern Fairfax County there is not a square foot of land that has not been impacted by man in some way for 10,000 years. There is lithic scatter everywhere. This is not to say that every foot contains a significant archaeological site, but the EPG contains several features that should yield significant archaeological data. Accotink Creek, a good sized stream, traverses the entirety of the parcel, with loops and bends suggesting the likelihood of terraces and pebble beaches. Wetlands would attract hunting, fishing and plant collection. Native Americans preferred these sorts of locations for long term encampments, and streams like the Accotink are generally lined with prehistoric sites for their entire length. Furthermore, since European settlement, this land has been lived on and farmed for from 250 to 350 years. It is very difficult to imagine that a parcel of this size would not include at least one house or barn site, and there is a potential for very early settlement sites.</p>			
Response			
<p>Numerous previous surveys have been conducted on the EPG. Extensive portions of the EPG have been disturbed through use and development, resulting in little of the EPG remaining that could retain intact archaeological resources.</p>			

Commenter	Comment #	Comment Type	Name
P27	P27.4	Private Citizen	Sallie Lyons
Section	Page Number	Organization	
4.9 Cultural Resources			
Comment			
<p>National Archives houses an inventory from Fort Belvoir of photographs and data compiled of structures, mostly houses, that were recorded by the Army after their acquisition and before demolition. They number almost 100. Army maps exist that locate landholdings by former owner. Presence and age of former structures can be determined by title searches in the Fairfax County archives. This kind of research should be done as part of an EIS and inform the selection and design process, rather than after selection and design of development sites. A new on-site archaeological survey combined with documentary research is necessary to identify and map significant cultural resources at the EPG.</p> <p>Similarly, the GSA parcel is written off as fully developed and therefore archaeologically barren, without any assessment. I spent half a year doing archaeological excavation of cleared areas that had been fully developed urban sites in south England which yielded a warehouse full of earlier artifacts. Slab construction, shallow footings, parking lots, and filled areas can conceal a wealth of untouched subsurface data. Any development that occurs at the GSA parcel must be paired with archaeological oversight.. At the very least, a documentary review and an assessment of potential by a qualified archaeologist should be included in the EIS.</p>			
Response			
<p>The matter raised represents a level of detail unnecessary to adequately understand relevant issues. The EIS provides adequate information on the status of the historic properties within and surrounding Fort Belvoir needed to present a preliminary analysis of potential effects to these properties. A detailed assessment of effects would be conducted during the Section 106 consultation process for the proposed undertakings. Records searches conducted for the EIS included searches of the National Register of Historic Places, Virginia Landmarks Register, Fairfax County Inventory of Historic Sites, and Fairfax County Historic Overlay Districts to identify historic properties. More intensive searches of background material and historic records would be conducted for detailed Section 106 analysis of potential impacts from specific projects.</p>			

Commenter	Comment #	Comment Type	Name
P27	P27.5	Private Citizen	Sallie Lyons
Section	Page Number	Organization	
4.9 Cultural Resources			
Comment			
<p>The list of impacted properties adjoining or encapsulated within Fort Belvoir has many gaps. While most existing National Register properties and National Historic Landmarks are recognized, there are many historic sites that are passed over and not addressed.</p>			
Response			
<p>Information on regional historic sites was collected from the National Register of Historic Places, Virginia Landmarks Register, Fairfax County Inventory of Historic Sites, and Fairfax County Historic Overlay Districts to identify historic properties.</p>			

Commenter	Comment #	Comment Type	Name
P27	P27.6	Private Citizen	Sallie Lyons
Section	Page Number	Organization	
4.9 Cultural Resources			
Comment			
<p>The Quaker town of Accotink, over 250 years old, but having its greatest significance for the Quaker mills, shipyards and settlements of the mid nineteenth century, is fully encapsulated by the base. The potential impacts on this unprotected treasure are enormous. The Accotink Methodist Church is recognized in passing, but not its extensive cemetery backing to the old railway site. Numerous other structures in the town, potential archaeological sites, not to mention the identity of the town itself, need to be addressed. The Quakers changed and defined southern Fairfax County. They were early anti-slavery advocates and promoters of education, social responsibility, technology and economic development and their descendents are numerous throughout south county.</p>			
Response			
<p>Comment noted. The role of Quakers in the region has been expanded in section 4.9.1.2.2. Accotink is included in the analysis as shown by its inclusion in Table 4.9-3. The matter raised represents a level of detail unnecessary to adequately understand relevant issues. The EIS provides adequate information on the status of the historic properties within and surrounding Fort Belvoir needed to present a preliminary analysis of potential effects on these properties. Detailed assessment of effects would be conducted during the Section 106 consultation process for the proposed undertakings.</p>			

Commenter	Comment #	Comment Type	Name
P27	P27.7	Private Citizen	Sallie Lyons
Section	Page Number	Organization	
4.9 Cultural Resources			
Comment			
<p>Lists of potentially impacted historic properties on Mason Neck and environs were spotty at best. Unmentioned in the Belvoir viewshed were Lebanon, a late eighteenth century house in the Pohick Bay Regional Park, and Overlook Farm or Bienvenue, within the Gunston Hall holdings. Both have views of Belvoir across Pohick Bay., both are listed in the Fairfax County Inventory of Historic Sites. The site of La Grange plantation/inn on Old Colchester Road is surrounded on three sides by Fort Belvoir. At the western end of Old Colchester Road is the historic chartered eighteenth century port town of Colchester, currently in process of historic district nomination., Any impact to traffic and changes to register-eligible Old Colchester Road would profoundly impact the old town, which also includes the National Register listed Fairfax Arm Tavern.</p>			
Response			
<p>Lebanon House and Overlook Farm have been added to the analysis. Archaeological sites such as the La Grange site are not included in the APE outside Fort Belvoir. Old Cochester town site is outside the APE for the EIS and no changes are proposed for Old Cochester Road in this area.</p>			

Commenter	Comment #	Comment Type	Name
P27	P27.8	Private Citizen	Sallie Lyons
Section	Page Number	Organization	
4.9 Cultural Resources			
Comment			
<p>The great nationally recognized historic properties that would be impacted by the proposed actions are Mount Vernon, Woodlawn Plantation and Gunston Hall. Little is made of the potential impact to these revered properties, and to their viewsheds. Woodlawn had already suffered major damage to its ambience through construction on adjoining Army property. The administrators of these properties should be allowed to weigh in on what they consider would be negative impacts to them in the Army alternatives and propose acceptable mitigations, rather than having an EIS that deals in vague guess work.</p>			
Response			
<p>The EIS provides adequate information on the status of the historic properties within and surrounding Fort Belvoir needed to present a preliminary analysis of potential effects on these properties. Detailed assessment of effect would be conducted during the Section 106 consultation process for the proposed undertakings, which would include an extensive process to involve consulting parties such as the administrators of the historic properties.</p>			

Commenter	Comment #	Comment Type	Name
P27	P27.9	Private Citizen	Sallie Lyons
Section	Page Number	Organization	
4.9 Cultural Resources			
Comment			
<p>On the mega scale, the renaming of “environmentally sensitive” blocks of land as “community” verges on the totally irresponsible. “Environmentally sensitive” has legal and enforceable ramifications. “Community” is a term that is meaningless. No white wash will alter the nature of these sensitive areas. On page 4-300, Section 4.9.2.1.5, the document states that “an area currently designated as Outdoor Recreation and Environmentally Sensitive would be changed to Community, opening this area to development.” The intent of the renaming is clear. This attempt at obfuscation has great impact on cultural resources as well as environmental resources, because prehistoric cultural sites tend to increase in density near streams and wetlands. Such a re-designation is totally inappropriate and unacceptable.</p>			
Response			
<p>There was no attempt at obfuscation, as shown by the EIS text stating that a Community designation would open the area to development. Your concerns for potential impacts from this proposed re-zoning are now a part of the administrative record and will be taken into account.</p>			

Commenter	Comment #	Comment Type	Name
P27	P27.10	Private Citizen	Sallie Lyons
Section	Page Number	Organization	
4.9 Cultural Resources			
Comment			
<p>In summation, the cultural resources unit of the draft EIS needs to be researched in greater depth and the findings made accessible to the selection process in order to carry weight in the process itself. There must be greater documentary research and a new archeological survey of the EPG and the GSA site. Mitigation for impacts on historical and archaeological sites must be defined. Environmentally Sensitive areas must retain their designation for protection of both environmental and cultural resources.</p> <p>A more informed process will reduce impacts on irreplaceable cultural resources that are national assets and part of our past and future heritage.</p>			
Response			
<p>Research was conducted of the National Register of Historic Places, Virginia Landmarks Register, Fairfax County Historic Sites Inventory, and Fairfax County Historic Overlay Districts. Your comment will be made part of the administrative record of the action. The Section 106 process would provide the opportunity for interested parties to become informed about detailed proposed undertakings and potential effects of those undertakings. The Army invites you to be included in the consultation process.</p>			

Commenter	Comment #	Comment Type	Name
P28	P28.1	Other Organization	David Hilde
Section	Page Number	Organization	
4.3 Transportation		Clark Realty Capital, L.L.C.	
Comment			
<p>We own the property located at 7200 Fullerton Road, which is immediately adjacent to where the Fairfax County Parkway is planned to be constructed. This letter is a response to the Draft Environmental Impact Statement for the realignment of Fort Belvoir.</p> <p>It is our understanding that there are two options being considered for how Fullerton Road and the Fairfax County Parkway will interact. The first option would have Fullerton Road stay at grade with the Fairfax County Parkway being elevated over Fullerton Road. The second option would have Fullerton Road being elevated over the Fairfax County Parkway, which would be built at grade.</p> <p>Elevating Fullerton Road would have a material adverse impact to the ability to access our property, as well as access to the other property immediately adjacent to the opposite side of the Fairfax County Parkway. Under the option in which Fullerton Road would be elevated, it is estimated that Fullerton Road would be above grade almost the entire length of the frontage of our property. As Fullerton Road is the only access to our property from a public road, we would effectively lose access to our property and the value to our property would be materially adversely affected. Therefore, we request that Fullerton Road remain at grade in order to limit impact to access of our property.</p>			
Response			
<p>The proposed roadway design through EPG does not modify the current approved VDOT plan to grade separate Fairfax County Parkway from Fullerton Road and have Fullerton Road cross over the parkway.</p>			

Commenter	Comment #	Comment Type	Name
P29	P29.1	Private Citizen	Pam Cressey
Section	Page Number	Organization	
Other			
Comment			
<p>1. Overall, I have a general concern that both the cultural resource section and the traffic section appear to minimize impacts against all odds that such massive change would have adverse effects. At issue--what are they and how can they be mitigated. It is very important for the Army to use best practices to meet the law/regulations but also to come to the public with full disclosure and recognition of what can happen and what the pledge is regarding mitigations. The public involved in reviewing the EIS are savvy and aware of many basic aspects of EIS study and writing. The citizens are also passionately involved in protecting their quality of life. This does not need to be an adversarial process with the public, but a partnership. It is ultimately the people living around Belvoir, running the businesses, as well the commuters traveling through Belvoir-affected roads and to Belvoir who will be most affected by BRAC. I strongly recommend that these consistencies be pulled together into a series of working stakeholder group on different topics: biological resources, cultural resources, traffic, air and water quality, etc. These stakeholders would receive information, offer suggestions, understand procedures for collecting data and the results, etc.monthly. They would meet jointly once a quarter. There would be a defined process for moving through the EIS and each step of developing and implementing BRAC. In this way, there will be consistency and knowledge--a working partnership thatis long-term. I have worked with several such groups in Alexandria as staff, and where it is more time-consuming for staff, I am convinced that the process produces a better result that builds expertise and trust. If BRAC is going to occur, we should grasp it as an opportunity to build a stronger community that brings Belvoir into the larger area.</p>			
Response			
<p>The Army does not agree that the EIS minimizes impacts to cultural resources or transportation. As noted in the document, implementation of BRAC would result in significant adverse effects. The Army does agree that public interest and involvement in the Army's proposals are important. As prescribed by Council on Environmental Quality regulations and Army policies, the Army has conducted its environmental analysis process and path toward decision making openly with the public and interested federal, state, and local agencies. In addition to a scoping meeting at the outset of the NEPA process, the Army has held other public meetings to enable the public to be informed of relevant issues. The Army extended the public comment period on the draft EIS to 60 days to allow thorough review by the public and agencies. The Army has also hosted a "Board of Advisors" to keep community leaders informed of the status of BRAC. At neighborhood groups' request, the Army has provided knowledgeable personnel to appear at meetings to allow residents to ask questions and better understand the Army's proposals. These measures have been beneficial ibecause they have enabled the Army to be aware of and sensitive to community concerns. As circumstances warrant, the Army can provide further opportunities for community awareness.</p>			

Commenter	Comment #	Comment Type	Name
P29	P29.2	Private Citizen	Pam Cressey
Section	Page Number	Organization	
Other			
Comment			
<p>2. In reviewing future documents, I strongly recommend that reports on are put on the web in pieces--chaper by chapter so they can be easily located and printed by the public. It is exhausting to do this from your home commuter or trek to the library and read long documents or spend time and money copying. I really encourage methods that encourage public review and participation.</p>			
Response			
<p>The Army has sought to make the EIS for proposals at Fort Belvoir widely available to the public and agencies and regrets any difficulties that anyone might have encountered while downloading the document from the Web. The EIS now appears both ways on the Web – as a whole document, and in segments. Thank you for your patience and letting us know about this so that similar problems in the future might be avoided.</p>			

Commenter	Comment #	Comment Type	Name
P29	P29.3	Private Citizen	Pam Cressey
Section	Page Number	Organization	
4.9 Cultural Resources			
Comment			
<p>3. Lastly, as an archaeologist I want to comment on the minimal nature of the archaeological section of the EIS. It truly does not meet best practices and does not provide any data from which to draw a conclusion that there will be minimal adverse effect. Even if the specific footprints of buildings or impact areas have not been delineated, general impact areas have. It is necessary to provide lists of all the sites registered on Belvoir as well as surrounding areas of similar topography and history. From this information, historic maps and predictive models it is possible to assess the potential that significant resources may be extant and threatened by the proposed impacts. This is minimal and basic to archaeological Section 106 process. But in this case, when footprints have not been established, it is possible to use best practices--to identify areas of high, medium and low potential, and then propose to survey them. In this way, the goal is to determine where the least adverse effects are and recommend project impact in these locations. Most importantly, this information must be integrated with biological and other EIS results to determine the best ways to build so the most resources are preserved with the least adverse effect to the total environment.</p>			
Response			
<p>The matter raised represents a level of detail unnecessary to adequately understand relevant issues. The EIS provides adequate information on the status of the historic properties within and surrounding Fort Belvoir needed to present a preliminary analysis of potential effects on these properties. Detailed assessment of effect would be conducted during the Section 106 consultation process for the proposed undertakings.</p>			

Commenter	Comment #	Comment Type	Name
P29	P29.4	Private Citizen	Pam Cressey
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>4. Lastly, as a daily commuter past Belvoir, I assure everyone that the traffic at peak times is almost at a standstill. I think it is essential that the BRAC EIS and any other reports and policy statements underline Belvoir's commitment to shuttles between the base and metro and that telecommuting be a standard practice--if working at home or from off-site locations can be organized m-f, it may be possible to really reduce traffic in an orderly fashion.</p>			
Response			
<p>The Record of Decision will indicate whether transit services as mitigation actions will be adopted by the Army, as appropriate. Funding will also be addressed in the ROD.</p>			

Commenter	Comment #	Comment Type	Name
P30	P30.1	Other Organization	Dale Zehner
Section	Page Number	Organization	
4.3 Transportation		Virginia Railway Express	
Comment			
<p>The Virginia Railway Express (VRE) is in agreement with the statement in the DEIS indicating ... the ability of transit to contribute to the mitigation is greater (for the Preferred and City Center Alternatives) than for the other alternatives because these alternatives use sites that are closer to the regional rail network.</p>			
Response			
<p>Comment noted.</p>			

Commenter	Comment #	Comment Type	Name
P30	P30.2	Other Organization	Dale Zehner
Section	Page Number	Organization	
4.3 Transportation		Virginia Railway Express	
Comment			
<p>However, we disagree with the conclusion, for each of the alternatives, that Implementation of the BRAC-related projects... would likely not adversely affect use of the rail systems because of the continued lack of direct service. This is a realistic assessment if no transportation mitigation measures are implemented. However, the DEIS proposes the establishment of shuttle service between the Franconia-Springfield VRE/Metro station and Fort Belvoir employee work locations as part of the mitigation strategy for each BRAC alternative. Provision of connecting shuttle service is a relatively low cost measure that makes existing rail transit (VRE and Metro) a more viable commuting option for Fort Belvoir employees and is likely to attract riders to VRE, particularly those employees living in Stafford County, Fredericksburg and other points south.</p>			
Response			
<p>If the ROD adopts transit services as a mitigation action, services plans for transit services and impacts to VRE will be determined at that time. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.</p>			

Commenter	Comment #	Comment Type	Name
P30	P30.3	Other Organization	Dale Zehner
Section	Page Number	Organization	
4.3 Transportation		Virginia Railway Express	
Comment			
<p>Several of the proposed bus routes included as mitigation measures operate along the I-95/Route 1 corridor and in western Fairfax County in basically the same operating area as the VRE. New transit services should be coordinated among all transit providers (i.e., VRE, Fairfax Connector, WMATA, PRTC) to maximize the benefits to riders while minimizing operating costs and service redundancies.</p>			
Response			
<p>The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.</p>			

Commenter	Comment #	Comment Type	Name
P30	P30.4	Other Organization	Dale Zehner
Section	Page Number	Organization	
4.3 Transportation		Virginia Railway Express	
Comment			
<p>Additionally, the DEIS relies on the implementation of numerous unfunded roadway and transit improvements to mitigate the significant, adverse transportation impacts of the BRAC actions. Unless all the roadway and transit mitigation measures are realized, and an aggressive travel demand management program implemented at the installation, congestion on I-95, U.S. Route 1 and other roadways in the vicinity of the Main Post and EPG can be expected to increase. That situation would also tend to make VRE, in conjunction with shuttle service to each site, more attractive as an alternative to driving.</p>			
Response			
<p>The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding will also be addressed in the ROD.</p>			

Commenter	Comment #	Comment Type	Name
P30	P30.5	Other Organization	Dale Zehner
Section	Page Number	Organization	
4.3 Transportation		Virginia Railway Express	
Comment			
Until a commitment is made to funding the proposed mitigation measures and without further information, it is not possible for VRE to determine the potential effect of the BRAC actions on the rail system. VRE's existing service has capacity to accommodate growth in ridership, but it is constrained to a large degree by the availability of parking at outlying stations. Future capacity is also constrained by the availability of parking resources and by the existing operating agreement between VRE and CSX Transportation.			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.			

Commenter	Comment #	Comment Type	Name
P30	P30.6	Other Organization	Dale Zehner
Section	Page Number	Organization	
4.3 Transportation		Virginia Railway Express	
Comment			
The following information regarding Fort Belvoir employee commuting habits is requested to enable a better assessment of potential impact of the BRAC actions on VRE service and operations. - Number of existing and relocating employees who currently ride VRE - Number of existing employees who would take VRE, based on their residence location, if connecting transit to their work location were available - Number of relocating employees who would take VRE if connecting transit to their work location were available I would also like to reiterate my previous request that any proposals to mitigate BRAC impacts that rely on increased use of VRE be heavily coordinated with our agency.			
Response			
A combined 5 percent transit and rideshare was assumed for the analysis in the EIS. Transportation mitigations for the Preferred Alternative, including transit and TDM programs, are addressed in Section 4.3.4.4. The Record of Decision will indicate whether transit services as mitigation actions will be adopted by the Army, as appropriate. Funding will also be addressed in the ROD. For these adopted actions, the Army will cooperate with the County, VDOT, and other state and federal agencies on required studies and design work.			

Commenter	Comment #	Comment Type	Name
P31	P31.1	Private Citizen	Bob McLaren
Section	Page Number	Organization	
4.3 Transportation			
Comment			
First of all, a bumper sticker my wife saw recently. It said welcome to North Virginia, expect delays. I would like to mention contractors. I am one of those embedded contractors, by the way, that's mentioned there, but what's not mentioned is the support contractors, non-embedded one, and that's a serious flaw in oversight. I would also mention that in the mitigation measures, rail is not considered at all, and that's a serious oversight. It has to be part of the total mitigation transportation package.			
Response			
Non-embedded contractors are covered by the number of visitors assumed. The number of visitors assumed is consistent with that experienced by the Pentagon today - between 900 and 1,000 daily. The WMATA study examined a possibility of rail to Fort Belvoir and found it unfeasible. Please see Section 4.3.3.3 for more information if desired.			

Commenter	Comment #	Comment Type	Name
P31	P31.2	Private Citizen	Bob McLaren
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
Moving on to air quality, the EIS really doesn't address air quality at all. It's really hand waving. To state that there's less people going to be moving around because people are moving out and all of the people are staying just relocated, you know, just moving within the area, is a gross over simplification. You've already heard from Delegate Watts that that's really not true, this is going to be an overlay of people on our existing population.			
Response			
Information on mobile sources of air emissions appear in Section 4.4.2.2.2 and Appendix E.1 Sections 3.1.1.2 and 3.1.3.2. Issues relating to ozone and PM2.5 were addressed. Additional text and analysis were included in the EIS as Table 4.3-17 to substantiate the overall reduction in vehicle miles traveled.			

Commenter	Comment #	Comment Type	Name
P31	P31.3	Private Citizen	Bob McLaren
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
However, also, what's not considered is the fact that traffic, delays, more time on the road; these are going to add to our air pollution also. So the EIS has to address both ozone and particulate matter, especially as it affects the local monitors, because that can have an indirect impact on Fairfax County and the fact that we are noncompliance.			
Response			
Information on mobile sources of air emissions appear in Section 4.4.2.2.2 and Appendix E.1 Sections 3.1.1.2 and 3.1.3.2. Issues relating to ozone and PM2.5 were addressed. Additional text was included in the FEIS in Section 4.4 to clarify the criteria used to determine need (or lack thereof) for a PM2.5 or ozone hot spot analysis or modeling.			

Commenter	Comment #	Comment Type	Name
P31	P31.4	Private Citizen	Bob McLaren
Section	Page Number	Organization	
4.2 Land Use			
Comment			
I'd also like to address the land use plan. I absolutely oppose the re-categorization of environmentally sensitive land. This is removing protection from it and is acknowledged within the EIS. Paragraph 4.6.2.1.1, the professional and industrial community and residential land uses would allow development in areas that were considered environmentally sensitive. Fort Belvoir has normally a positive attitude when it comes to environmentally sensitive areas. I quote, for example, "the formation of the Abbott Wetlands area," and the commitment to the wildlife corridor, although, that's been constrained over past years. So again, that needs to be changed.			
Response			
The updated land use plan in the FEIS reclassified land use categories from the 1993 Master Plan in accordance with Army Regulation 210-20 and the Army's Master Planning Technical Manual (MPTM). In addition to regulatory protection requirements, environmentally sensitive areas remain protected by mitigations identified in environmental assessments and in the 1991 BRAC ROD. In addition, the project siting process on Fort Belvoir evaluates both compliance with land use designations and potential other issues with sites. Areas identified as sensitive (i.e., RPAs, wetlands) still retain their regulatory protections. See the response to Comment L1.4.			

Commenter	Comment #	Comment Type	Name
P31	P31.5	Private Citizen	Bob McLaren
Section	Page Number	Organization	
4.7 Water Resources			
Comment			
I also would like to mention in passing that at the EPG there's more than just EQC, Environmental Quality Corridor, that's reflected outside. There's RPA there, which is not mapped, and furthermore, we in Fairfax County recently found our RPA is much more extensive than we thought it was when we actually went out and looked at our streams, we found many more primary streams, perennial streams, than we thought.			
Response			
RPAs have been mapped by Fort Belvoir, and RPA acreage information was updated in the FEIS. RPAs on EPG and the hospital site on the Main Post were field delineated using the county protocol in January 2007. Appendix J has been added to the EIS showing proposed project location maps as well as approximate acreages, based on best available information, of impacts on water resources and RPAs.			

Commenter	Comment #	Comment Type	Name
P31	P31.6	Private Citizen	Bob McLaren
Section	Page Number	Organization	
4.7 Water Resources			
Comment			
There are tributaries that I personally know at EPG that are not in EQC that would be RPA, and speaking about streams, BRAC is going to have significant impact. Even in the draft EIS, there is a number of water sheds that'll have over a ten percent increase in a one in ten year storm events, and they state that these increases can range up to 100 percent. However, my own personal experience, having worked in Fairfax County for many years, is that the models under predict this, and some cases grossly.			
Response			
As referenced in the introduction to Section 4.7.2, BMPs and other stormwater management practices were not included in the impact analysis because of the need to identify final siting of proposed projects before stormwater management planning. Therefore, the analysis presents peak flow and pollutant loading results that will be substantially reduced by implementing effective stormwater management practices and mitigation efforts in compliance with all applicable federal, state, and local stormwater requirements. These future stormwater planning efforts using best available planning and design information were considered during the assessment of potential effects. The Army would comply with all relevant and applicable federal, state, and local requirements to help ensure the Army's proper stewardship of its resources.			

Commenter	Comment #	Comment Type	Name
P31	P31.7	Private Citizen	Bob McLaren
Section	Page Number	Organization	
4.7 Water Resources			
Comment			
Furthermore, what's not even considered is the total volume change. Erosion, stream bank erosion, is not only caused by peak flow, but total volume, and with the increase in pervious surface, there will be a substantial increase in total volume.			
Now, the draft EIS proposes a great list of mitigation measures for this, you know, I'm really impressed. However, it's (off mike), there is no commitment. There is nothing that allows me to judge and say okay, yes, they're serious impacts, but they're being mitigated and mitigated successfully.			
Response			
Stormwater effects and potential changes in pollutant loadings are discussed throughout. Potential increases in flow volume were calculated at the watershed scale and are presented in the Cumulative Impacts section. Peak flow is the primary concern at the subwatershed scale. See the responses to Comments P13.18 and P13.19.			

Commenter	Comment #	Comment Type	Name
P31	P31.8	Private Citizen	Bob McLaren
Section	Page Number	Organization	
Other			
Comment			
Absent that, I would have to rule the EIS as a failure. They said there's going to be serious problems and has not mitigated anything. I would recommend, for example, that you'll have a commitment somewhat similar to reducing the amount of runoff to a naturally forest condition, which is something we're starting to look at here, and some of these mitigation measures that you've mentioned would help satisfy that. I would make one final mention, by the way, I'm going to be submitting written comments afterwards, so I'll be covering this in greater detail, as well as my comments on traffic.			
Response			
The Army does not agree that its EIS is a failure. The document's identification of several effects of concern helps the Army carry out its role as a good environmental steward. As part of its proper scope, the EIS identifies reasonable and feasible mitigation measures. The Record of Decision will establish those mitigations that the Army will implement.			

Commenter	Comment #	Comment Type	Name
P31	P31.9	Private Citizen	Bob McLaren
Section	Page Number	Organization	
Other			
Comment			
There are things you can do outside the areas directly impacted by BRAC to help in the mitigation measures. For example, Davison Army Air Field, stream restoration repairing and buffer, a restoration can be done there. That would help reduce the overall impact in Accotink that's going to be caused by events upstream at EPG.			
Response			
Potential effects on water resources are addressed in Section 4.7 of the EIS. For each alternative for BRAC implementation, consideration is given to various aspects of the resources and, where appropriate, best management practices and mitigation measures are identified. Army commitment to mitigation measures is reserved for the Record of Decision.			

Commenter	Comment #	Comment Type	Name
P31	P31.10	Private Citizen	Bob McLaren
Section	Page Number	Organization	
Other			
Comment			
Also, you can look for reforestation at other areas of Fort Belvoir. I mentioned, for example, the areas that are being grubbed on the EPG -- and buffer, a restoration can be done there. That would help reduce the overall impact on Accotink that's going to be caused by events upstream at EPG. Also, you can look for reforestation of other areas of Fort Belvoir. I had mentioned, for example, the areas that are being grubbed on EPG, to locate and remove any unexploded ordnates. A lot of this area does not appear to be proposed for development and this would be a great area to reforest, and I would encourage oak or mixed hardwood in this. Once again, I thank you for the opportunity to comment and good night.			
Response			
Facility design and best management practices seek to reduce impacts of construction and operations. The Army selects the types of vegetative cover for specified areas on the basis of several factors, including potential for habitat creation, soil retention, aesthetics, and maintenance of native species. The considerations will be applied to all development associated with implementation of BRAC.			

Commenter	Comment #	Comment Type	Name
P32	P32.1	Private Citizen	Larry Zaragoza
Section	Page Number	Organization	
Other			
Comment			
<p>In general, we find that the draft EIS really doesn't seem to reflect current knowledge or identify adequate mitigation to compensate for reasonably anticipated impacts.</p> <p>We found this aspect of the document to be poor. The draft EIS really doesn't get to a lot of analysis on the potential impacts and discussion for options on how to mitigate those. It's a long and complex document. We have a number of concerns with this document because it affects our roads, they're already congested, the region is not in attainment for the National Ambient Air Quality Standards for ozone and fine particles, waterways are not meeting water quality standards.</p>			
Response			
<p>The draft EIS evaluates the cited matters and, where appropriate, identifies potential mitigation measures for consideration by senior Army leadership.</p>			

Commenter	Comment #	Comment Type	Name
P32	P32.2	Private Citizen	Larry Zaragoza
Section	Page Number	Organization	
Other			
Comment			
<p>One of the problems is that you have all of these projects take place individually and they may have a small impact, but you take projects in a cumulative sense and they have a substantial impact.</p>			
Response			
<p>Section 5.0 addresses cumulative effects. Its 23 pages reflect appropriate consideration of cumulative effects of the proposed action in light of past, present, and reasonably foreseeable actions by federal and other proponents.</p>			

Commenter	Comment #	Comment Type	Name
P32	P32.3	Private Citizen	Larry Zaragoza
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
<p>This is a huge project and even though it does not, in and of itself, perhaps change the ozone standard from being attainment to non-attainment or the converse, it plays a significant role as anything that I can imagine that we have in the region, and I'll get into that in a little bit more detail. In terms of air quality, right now, vehicles already comprised the largest single source of emissions in the National Capital area. The draft EIS presumes that there is going to be a net decrease in vehicle emissions, but yet, we're going to have 2,200 personnel relocated to the facility. There are assumptions embedded in this draft EIS that we just could not understand. If people currently own houses, if they currently rent or whatever, they are going to have things that tie them to their existing residence, and so to assume that they're all going to be moving, particularly in the early stages, seems unreasonable.</p>			
Response			
<p>Information on mobile sources of air emissions appear in Section 4.4.2.2.2 and Appendix E.1 Sections 3.1.1.2 and 3.1.3.2. Issues relating to ozone and PM2.5 were addressed. Additional text and analysis were included in the EIS as Table 4.3-17 to substantiate the overall reduction in vehicle miles traveled. See also the response to Comment P26.1.</p>			

Commenter	Comment #	Comment Type	Name
P32	P32.4	Private Citizen	Larry Zaragoza
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
Secondly, these people are going to be going to already congested roads and the congested roads are going to be further aggravated by the additional traffic. It's also important to realize that additional traffic and congestion is going to have not only an impact on people's commuting time, but from my perspective, it's going to impact air quality, because as you travel at lower speeds, you're going to have more emissions per mile and you actually may have cars running for a longer period. So the assumptions that have been made, in terms of the emissions for these cars, may well be underestimated.			
Response			
The Army adopts the information provided in the comment. Table 4.3-17 in Section 4.3.4.2.1 of the FEIS demonstrates a reduction in vehicle miles traveled. Information on mobile sources of air emissions appear in Section 4.4.2.2.2 and Appendix E.1 Sections 3.1.13.2 and 3.1.3.2.			

Commenter	Comment #	Comment Type	Name
P32	P32.5	Private Citizen	Larry Zaragoza
Section	Page Number	Organization	
4.7 Water Resources			
Comment			
In terms of water resources, there are references to, in the beginning of the report, following applicable regulations. However, the report does not the draft EIS doesn't seem to be sensitive to a number of Fairfax County regulations related to Chesapeake Bay Preservation Act and other pieces, and given the water quality that we have in the area, it seems like it's important that we identify those and we follow those just as any other development project in the county would be expected to do.			
Response			
Fairfax County and Chesapeake Bay Preservation Act requirements were addressed in the DEIS in Section 4.7.			

Commenter	Comment #	Comment Type	Name
P32	P32.6	Private Citizen	Larry Zaragoza
Section	Page Number	Organization	
4.8 Biological Resources			
Comment			
Wildlife, there really does not appear to be a whole lot of sensitivity for the impacts of threatened and endangered species or wildlife in general. In order to maintain the wildlife that we have, it would be important to maintain wildlife corridors so that animals could continue to move in their environment. As you restrict the environment that they live in, we will lose diversity. This is particularly important for threatened and endangered species. Mitigation, it would be good to see more, in terms of mitigation to directly understand how impacts could be addressed. This is true for air quality particularly when you think about the impact of ozone and how the draft state implementation plan that we have that's been released by the Council of Governments is saying that we are a marginal attainment area, and this additional influx of contamination is just really going to aggravate the situation that we currently have.			
Response			
The wildlife corridor is maintained under all land use plans. The perceived 'lack of sensitivity' may be due to a relative limited discussion of this resource area (endangered and threatened species), but that is because of a determination that only minor effects would be expected.			

Commenter	Comment #	Comment Type	Name
P32	P32.7	Private Citizen	Larry Zaragoza
Section	Page Number	Organization	
Other			
Comment			
As it is right now, the Mount Vernon district is projected to be one of the areas which is really marginal in terms of making the standard in the future for the eight hour ozone standard, and also, I'd like to echo the comments many others have made, that mass transport, Metro, VRE, really should be critical to maintaining sustainability and relieving congestion that we have in the region.			
Response			
Section 4.3 identifies road and mass transit improvements that would mitigate effects of BRAC implementation. The Army concurs that sustainability and congestion relief are important objectives. Potential transportation mitigation measures have been identified in support of these objectives.			

Commenter	Comment #	Comment Type	Name
P33	P33.1	Private Citizen	Neal McBride
Section	Page Number	Organization	
4.3 Transportation			
Comment			
As a result, some people as they look at the transportation plan may say hey, there's a lot of need to be done and we've heard this from many politicians and others who've been looking at this. But there are the impacts in the secondary roads, and I'm speaking of specifically the Hose Road Quarter. We're now seeing with the Route 123 completion, that a lot of traffic coming out of Prince William comes up that quarter. Hose Road has not been fixed, it's on a long term plan and I'm probably in the many respects appealing that you and your contractors reach out to the Fairfax County Department of Transportation and VDOT to accelerate raise and ranking status, the need to fix the Hose Road Quarter, as much as anything else, because with the bottlenecks that we've heard, and are not going to be fixed apparently by this EIS projection, along I-95 and Route 1, they're going to come up Route 123, which is what they do often times now anyway, and that obviously impacts my community.			
Response			
Comment noted. The project the commenter requests is outside the realm of DoD. It is suggested that commenter request that his neighborhood association contact VDOT and the county for these improvements desired.			

Commenter	Comment #	Comment Type	Name
P33	P33.2	Private Citizen	Neal McBride
Section	Page Number	Organization	
4.10 Socioeconomics			
Comment			
Secondly, I am pleased to see that in your EIS draft, you've corrected what I thought was a negative comment made in the February 3rd one where you said the number of new students coming to the Fairfax County public school system is likely to be low, implying that there were no impacts, and I've heard some others say, including our own school department, that oh, don't worry you folks in the south county, you've got plenty of capacity, and then they forget that the BRAC is not the only thing happening in south county. It's the latest implication we have is the Springfield mall will start to see redevelopment, and you know, we can all talk about the many other opportunities for infill. So I'm pleased to see that in your page 520 you recognize that long term adverse effects would be expected to occur on off post schools, but that you also say that building new schools continues to be a challenge because of budget constraints and the rising cost of education. I was in the VA in many years ago and we did have a real federal impact program where when VA hospitals, or clinics, or a military or Indian facilities were built in an area, real money came for impact purposes from the federal government, and not just for transportation, but for schools and cultural resources as well. As we all know, that was killed about 15 years ago and now about all we can rely is possibly this half measure that the federal government is proposing and some of the transportation impacts. So I alert again, that you work with the county and state folks on trying to make sure that they look at the impact of the growth on south county schools.			
Response			
Comment noted. Thank you for your interest. The revised/updated EIS Section 4.10.2.2.2 reflects the estimated student population in the NCR.			

Commenter	Comment #	Comment Type	Name
P33	P33.3	Private Citizen	Neal McBride
Section	Page Number	Organization	
Other			
Comment			
<p>Finally, on a personal note, I used to work, as I said, in the VA and I hear from my friends, since I retired a few years ago, in the VA that there's a growing interest in working with the military facilities on getting an upstanding upgraded, not only military health care facility, but also to relocate and upgrade the veterans' facilities. We now have a very small clinic on Route 1 and the whole idea for years now has been to put a first class, probably many thousands of out patient visits a year, out patient clinic in concert with the new Army hospital that you're proposing, and again, I hear that from both internal, as well as external VA sources. And as Gerry Hyland mentioned earlier, I95 think this is an opportunity because, therefore, 10 or 20 years now has been a firm commitment on the VA to work in a joint venture arrangement with all of the military facilities. About ten years ago they passed some laws that made it also much more possible to work with private facilities.</p> <p>So I see an opportunity here, for many veterans such as my service connected son from Persian Gulf War 1, as well as many others who otherwise have to travel long distances to Martinsburg or downtown D.C. through that traffic. By having this new health care facility accelerated, and I hear there's some effort to try to accelerate the new health care facility that would also help many veterans since they would presume would be using that, in addition to what Fort Belvoir is likely to do to DeWitt. So I appreciate that opportunity. I hope that you'll work more closely with the county and state folks on these other two issues I mentioned, both the secondary roads off the base, off EPG, and making sure they're upgraded, as well as obviously impacting a better response to the school situation.</p>			
Response			
Comment noted.			

Commenter	Comment #	Comment Type	Name
P34	P34.1	Private Citizen	Gerald Musarra
Section	Page Number	Organization	
Other			
Comment			
<p>But I appreciate the opportunity to be part of this process, but I want to express my concern, and I'm saying concern of others that I've talked with, and it's talking about preserving the benefits of our military service members. I've been part of the Retiree Council, Fort Belvoir, for about 13 years now.</p> <p>We always were looking at being vigilant of protecting the benefits of military, so not just the retirees, because as I say if any soldier and their family live long enough, they will enter the retiree ranks and it's up to us to preserve those, and it can be looked at though, as well, okay it's another benefit, I get very, very concerned, I and others, about the fact that what we call upon our soldiers, sailors, airmen, marine to serve this country and their families.</p> <p>And then to hear statements like well, it's kind of luxuries we can't afford anymore, and specifically what we're referring to is the use of the south nine golf course and then the impact of the Army Museum taking up the north nine, I mean the north 36 or part of that, and I'm saying where's kind of the justice, and you know, that's not always part of the package plan when we're putting out the recruiting bulletins or the recruiting advertisement, you know what I'm saying, you know, are we protecting the benefits.</p> <p>The military service is a special way of life and in my opinion, it requires special treatment of our soldiers and their families like forever. It's not a normal situation and I get very concerned when it talks about well, we really don't need this anymore because we have a global war on terror. Well, we have a global war on terror then, you know, we fund it, you know, and you know, I don't know what the total answer is, but I'm saying as long as this is part of the process, then I think I just want some specific sensitivity that it doesn't just lop things off the table. Put it some place else.</p>			
Response			
The Army recognizes the implementation of BRAC might adversely affect some aspects of recreational opportunities available to military personnel and civilian employees. Every effort is made, however, to balance mission requirements with considerations of the needs of personnel and their dependents.			

Commenter	Comment #	Comment Type	Name
P34	P34.2	Private Citizen	Gerald Musarra
Section	Page Number	Organization	
Other			
Comment			
<p>If a BRAC has to come upon us and we know that that's a big move, it's like a meteor coming towards Earth, I'm not so sure we have to, you know, look at it because there's no dominoes as we've noted tonight and for the past year and a half that are falling into place, but that is another issue. I'm not here to talk about that. I'm just concerned that we keep the issue that the Army takes care of its own, and to -- we have to preserve every benefit, and in my opinion, even add benefits for what we're requiring soldiers to do and their families. We have infantry divisions that are on their second or fourth tour back to Iraq and Iran and that's never going to stop, and I said I don't, you know, it's quite unfair that whenever BRAC and anything else is superimposed on the military, that it requires dismantling and disassembling benefits that are for the family either now, and the soldier and their family either now, or long into the future.</p>			
Response			
<p>The Army's taking care of its own includes the responsibility to ensure force protection -- of Soldiers and their dependents and civilian employees. The task is challenging, and sometimes its performance requires trade-offs.</p>			

Commenter	Comment #	Comment Type	Name
P35	P35.1	Private Citizen	Patricia Tyson
Section	Page Number	Organization	
Other			
Comment			
<p>I wanted to endorse the comments of Supervisor Connolly. I think that was very thorough review of the inadequacies of the draft EIS in supporting the proposed land use revisions. So I won't go into all of the detail that he did, but it's important that you take note of those and his pointing to you that there are several non-BRAC projects that have been swept into this process that do not belong here and should be removed. That includes the travel RV camp, I'm not quite sure what it is, but it's not a BRAC project.</p>			
Response			
<p>The MWR Family Travel Camp project, having funds available, would occur contemporaneously with implementation of BRAC. Accordingly, it is included in the EIS to ensure that all potential impacts to environmental resources occurring in the near term are accounted for.</p>			

Commenter	Comment #	Comment Type	Name
P35	P35.2	Private Citizen	Patricia Tyson
Section	Page Number	Organization	
Other			
Comment			
<p>As a reader, I want to say I had a lot of difficulty understanding the impacts of the projects on the environment. I think people have spoken very eloquently about the transportation and infrastructure needs and I'm not going to repeat those, but on the subject of impacts to the natural resources, I had a hard time understanding where the impacts would occur, and to what resources they would occur, and from what aspects of the project.</p> <p>So I suggest that the draft EIS be completely revised to make this clear to all of the readers and to the public, exactly where those multiple impacts are done, and as you probably know, both NEPA and CEQ regulations require that the agency review all of the mitigation that is possible of the environmental effect from these projects, which is not in the document.</p>			
Response			
<p>The Army has sought to make the EIS as comprehensible as possible. Impacts to relevant resources are evaluated, and analysis is presented to the best of the Army's abilities. Best management practices will be followed and mitigation measures have been identified to provide information on where and how adverse effects can be avoided, reduced, or compensated for.</p>			

Commenter	Comment #	Comment Type	Name
P35	P35.3	Private Citizen	Patricia Tyson
Section	Page Number	Organization	
4.7 Water Resources			
Comment			
There are many assertions that there are minor or moderate impacts. Those are not defined, it is not clear why that analysis resulted in that result, I just don't understand, and I have a good example of that which is the water shed impacts in EPG water sheds 53, 54, and 55 are shown to have pretty major impacts, but in fact, that doesn't in any way coordinate with where projects are located. So it's not clear why there would be impacts to those water sheds.			
Response			
Effects on those watersheds are from infrastructure improvements. See the new Appendix J that has been added to the EIS that contains footprint maps for all the BRAC projects.			

Commenter	Comment #	Comment Type	Name
P35	P35.4	Private Citizen	Patricia Tyson
Section	Page Number	Organization	
Other			
Comment			
An example is its not clear whether those projects have impacts to -- is impact construction, utilities included, roads, grating, you know, the real meats and bones of a construction project not clear at all, and I hope the public hearing knows that being a federal installation, obviously the post is exempt from state and local Fairfax County regulations. So this raises a lot of concerns about the lack of mitigation.			
Response			
The draft EIS identifies potential effects on 12 resources areas and appropriate best management practices and mitigation. Effects caused by construction are discussed relative to BRAC implementation.			

Commenter	Comment #	Comment Type	Name
P35	P35.5	Private Citizen	Patricia Tyson
Section	Page Number	Organization	
Other			
Comment			
Essentially, the draft EIS is asking the public to endorse them not breaking any federal law in doing the project, and it does not offer anything further than that. So we'll be looking at the ROD to have specific mitigation that's enforceable, because we do expect you to do it better than the worst it could possibly be, short of breaking the federal laws. And we heard a couple of people tonight offer to be stakeholders and to participate in helping you identify good and necessary mitigation. I offer myself, I know there are a couple of other people, and I think that many kind words have been said about your coordinating with the community. You can follow through and make sure, either direct your staff or your consultants to work with the community and those stakeholders who'd like to assist you in this effort, and I thank you for your time.			
Response			
Implementation of the proposed actions will be in accordance with all applicable federal, state, and local requirements. Fort Belvoir has invited the public's input in its environmental stewardship programs, and will continue to do so in the BRAC and master planning processes so that smart planning can occur. The Army appreciates the community's involvement in its endeavors.			

Commenter	Comment #	Comment Type	Name
P36	P36.1	Private Citizen	Norm Starler
Section	Page Number	Organization	
Other			
Comment			
<p>I'm going to take off from Gerry Musarra's comments about the loss of golf course facilities at Fort Belvoir, and it's kind of hard to bring this up on a night that we're thinking about what's happened down at Virginia Tech, and you know, but nevertheless, the one aspect that I would bring up is that there are community -- the golf course is a community resource. The green space provided by the 45 holes of golf courses provides green space, keeps the air cooler for the community at large. So it's not only the active duty military, the retired military, and the DOD civilians that enjoy the recreational space of the golf course, but the community as a whole benefits.</p> <p>Also, when you bring 20,000 more people, there's going to be a demand for golf course recreation. I think the EIS implies that picnic tables and swimming pools and maybe pool tables can substitute for golf course recreation. I don't think that's adequate mitigation. Other folks have talked about mitigation, and so it seems to me that there ought to be a way to construct the facilities that you need to construct to meet the needs in a way that takes advantage of the green space provided by the golf courses rather than eliminating them. Thank you.</p>			
Response			
<p>Loss of golf course assets would occur under the Preferred Alternative but not in all the alternatives. The Army's morale, welfare, and recreation program seeks to provide leisure activities to a wide range of patrons. In some cases, not all types of recreational opportunities can be provided, or they must be provided at reduced levels.</p>			

Commenter	Comment #	Comment Type	Name
P37	P37.1	Private Citizen	John Hurley
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>Ms. Hurley, Ellie and I live at the corner of Cherry Tree Drive and Route 235, and our concerns relate to the number one, the traffic impact that would be created by essentially plus 20,000 commuting day workers to and from Fort Belvoir</p>			
Response			
<p>The DEIS presented the impacts on the roadways due to the BRAC action and proposed roadway mitigation actions. The Record of Decision will adopt these mitigation actions as appropriate.</p>			

Commenter	Comment #	Comment Type	Name
P37	P37.2	Private Citizen	John Hurley
Section	Page Number	Organization	
4.8 Biological Resources			
Comment			
<p>and secondly, the impacts that have been very well, in fact better describe than I would, on wildlife and the environment, particularly as a great deal of residential construction going on as we speak at Fort Belvoir with massive clear cutting of historic timbers, some of them going back 200 years old.</p>			
Response			
<p>Appropriate mitigation measures for forest protection will be identified in the ROD.</p>			

Commenter	Comment #	Comment Type	Name
P37	P37.3	Private Citizen	John Hurley
Section	Page Number	Organization	
Other			
Comment			
<p>It's not just on the prior foot print of existing barracks and housing, but a rather serious problem. The Mount Vernon, as Supervisor Hyland has indicated, is very dynamic. There are improvements underway and expansions at Mount Vernon Estate.</p> <p>We have a number of schools here, the high school, and three elementary schools very close to 235. The closure of Woodlawn Road and the likely replacement, again, creates a strain. So our concern is one very simply of overload of particularly the roads.</p> <p>It's a bit wry that on one hand we have federal wildlife refuges, on the other side, and then at the same time, we'll be doing major construction. So we thank you for the opportunity to comment and we hope that whatever needs to be done can be done with minimal impact on the neighborhoods. Thank you.</p>			
Response			
<p>As a result of the draft EIS, the potential effects on traffic in the vicinity of Fort Belvoir are well documented and understood. The EIS identifies a number of potential mitigations for traffic impacts. The ROD will select appropriate mitigations.</p>			

Commenter	Comment #	Comment Type	Name
P38	P38.1	Private Citizen	Sallie Lyons
Section	Page Number	Organization	
4.9 Cultural Resources			
Comment			
<p>The draft EIS is completely deficient in its assessment of potential impacts on cultural resources. That is to say on archeological and historic sites. It contains little information concerning non-archeological and historic sites and informed decisions cannot be made without information.</p> <p>It needs to reference the Fairfax County inventory of historic sites, the county's archeological resource list, the list of sites eligible for or listed on the National Register of Historic Places, National Historic Landmarks, and other archivially recognized sites potentially impacted by the proposed changes at Fort Belvoir.</p>			
Response			
<p>The requested information is presented in the EIS in Sections 4.9.1.3 and 4.9.1.4.</p>			

Commenter	Comment #	Comment Type	Name
P38	P38.2	Private Citizen	Sallie Lyons
Section	Page Number	Organization	
4.9 Cultural Resources			
Comment			
<p>This part of Fairfax County is one of the richest in historic resources in the nation. People have lived on this land for 10,000 years and prehistoric sites are dense in this part of the county. The homes of two founding fathers are within the Belvoir view shed and we would be directly impacted by anything that occurs on south post. First President George Washington's Mount Vernon, a national shrine, lies within its view shed. Gunston Hall, home of George Mason, father of the Bill of Rights, over looks Belvoir. National registry property, Woodlawn Plantation has already been negatively impacted by earlier changes at Fort Belvoir. The plantation of Thomas Lord Fairfax, the father of Fairfax County, of the name of Belvoir, lies within the base and gives it its name.</p> <p>The historic Quaker town of Accotink...and the Friends Meeting House are surrounded by Fort Belvoir. Furthermore, there are over 100 farm and home sights, some very old, recorded in the National Archives by photography and map location that were destroyed in the acquisition of land for Camp Humphreys and Fort Belvoir. These need also to be referenced as potential archeological sites within the document. Before any decisions are made concerning placement of developments, it's imperative that the information indicating the scope of existing knowledge of historical and archeological sites be assessable in the EIS study.</p>			
Response			
<p>The matter raised represents a level of detail unnecessary to adequately understand relevant issues. The EIS provides adequate information on the status of the historic properties within and surrounding Fort Belvoir needed to present a preliminary analysis of potential effects on these properties. Detailed assessment of effects will be conducted during the Section 106 consultation process for the proposed undertakings.</p>			

Commenter	Comment #	Comment Type	Name
P38	P38.3	Private Citizen	Sallie Lyons
Section	Page Number	Organization	
4.9 Cultural Resources			
Comment			
<p>There is no minimal impact to destruction of cultural resources because of poor planning that would result from ignorance is not minimal impact. The EIS should include a list of non-historic and archeological sites within and adjacent to Fort Belvoir. To this end, I would recommend you work with the Fort Belvoir base historian, the Fairfax County Department of Cultural Resources, the Northern Virginia Chapter of the Archeological Society of Virginia, and the Virginia Department of Historic Resources.</p> <p>You should also communicate with the administrations of Mount Vernon Plantation, Gunston Hall, and the National Trust for Historic Preservation, and recognize their concerns in the document. Impact on cultural resources will only be minimal if planning decisions are informed by knowledge while they are being made. Thank you.</p>			
Response			
<p>The EIS provides adequate information on the status of the historic properties within and surrounding Fort Belvoir needed to present a preliminary analysis of potential effects on these properties. Detailed assessment of effects would be conducted during the Section 106 consultation process for the proposed undertakings. Fort Belvoir has already initiated involvement of consulting parties in the start of the Section 106 compliance process.</p>			

Commenter	Comment #	Comment Type	Name
P39	P39.1	Private Citizen	John Sperling
Section	Page Number	Organization	
Other			
Comment			
<p>I have two concerns, one of which is the pending redevelopment of Central Springfield might be drastically impacted by this BRAC and the proposed building at Fort Belvoir. I want to see Springfield to be a place that people drive to rather than drive through and with the congestion that's potentially forecast under the BRAC, I think that it could drastically impact the area.</p>			
Response			
<p>As a result of the draft EIS, the potential effects on traffic in the vicinity of Fort Belvoir are well documented and understood. The Army will make every effort, to the extent allowed by law, to alleviate effects on the off-post community, to include its commercial districts.</p>			

Commenter	Comment #	Comment Type	Name
P39	P39.2	Private Citizen	John Sperling
Section	Page Number	Organization	
4.10 Socioeconomics			
Comment			
<p>Second, as a resident of the area now, living right outside Fort Belvoir, I'm concerned and hopefully it will not be replicated, but the drastic drop in property values when the Springfield Mixing Bowl started, everybody was concerned about how that would impact traffic and the property values drastically reduced as I moved from one part of Springfield to another.</p>			
Response			
<p>Comment noted. Thank you for your interest and support. Your comment will be made part of the administration record of the action.</p>			

Commenter	Comment #	Comment Type	Name
P39	P39.3	Private Citizen	John Sperling
Section	Page Number	Organization	
Other			
Comment			
<p>Given all of these factors, I guess I'm concerned that we want to do the equivalent of dropping the Pentagon in the Fort Belvoir area and build 6 million square feet of office space in less time that we did the Mixing Bowl at the Springfield interchange.</p>			
Response			
<p>The Army recognizes the magnitude of its proposed actions. Whether changes in local property values would occur (or the extent of such changes) as a result of the Army's proposed actions are speculative and beyond the ability of the Army to control.</p>			

Commenter	Comment #	Comment Type	Name
P39	P39.4	Private Citizen	John Sperling
Section	Page Number	Organization	
4.2 Land Use			
Comment			
<p>One of the reasons it was given for doing this BRAC was to consolidate for security reasons, and I guess our main concern that we want to build two bases at Fort Belvoir, one on one side of 95 and the other on the other, and therefore, we're going to end up with two fire departments, two police departments, two day care centers, two gyms, et cetera, and have a redundancy and a repeating effect on both sides of the base, and in September the Assistant Secretary of the Army for installations offered at Davison Air Field, for potential consideration and said if we could find another place for it he would consider giving up Davison Air Field, and I think Davison Air Field should be a strong contender for using the revitalization or the rebuilding of the BRAC, and it's been somewhat neglected.</p>			
Response			
<p>Davison Army Airfield was identified as a potential administrative facility development area under the Satellite Campuses Alternative. For reasons stated in the EIS, it is not the preferred siting for implementation of BRAC at Fort Belvoir.</p>			

Commenter	Comment #	Comment Type	Name
P39	P39.5	Private Citizen	John Sperling
Section	Page Number	Organization	
Other			
Comment			
<p>I know the Army has been the less then forth coming with the movement of aircraft in and out of Fort Belvoir and Davison Air Field, and even tonight I was told that Davison Air Field is considered a VIP executive airport, and I don't know if we can afford those kind of luxuries given the drastic impact on the local economy and the local constituents of what this move and consolidation at Fort Belvoir could be given. No matter how you come and go under the new program, you're going to have to come up from the Metro and go either east or west on the parkway and it'll drastically impact a lot of us in the neighborhood.</p>			
Response			
<p>For whatever alternative is selected, the Army will implement mitigation measures as appropriate.</p>			

Commenter	Comment #	Comment Type	Name
P39	P39.6	Private Citizen	John Sperling
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>Even a consideration of building this south platform of the VRE or at the Metro and coming down the backside of 95, on the east side of 95 rather, would greatly facilitate the move rather than coming up on the parkway and going east over the EPG or going west down into Fort Belvoir. I think those are the kind of considerations that we need to look at as far as maximizing the use of mass transportation.</p>			
Response			
<p>The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.</p>			

Commenter	Comment #	Comment Type	Name
P39	P39.7	Private Citizen	John Sperling
Section	Page Number	Organization	
Other			
Comment			
<p>Again, there seems to be a lot of lack of concern for the local constituencies outside of Fort Belvoir, and I remain concerned about how we, as citizen, and people that use Fort Belvoir and also live outside of Fort Belvoir are going to be impact with this potential move. Thank you.</p>			
Response			
<p>The Army does not agree that it has shown a lack of concern for the local community. Consistent with Council of Environmental Quality regulations and Army policy, the Army has carefully prepared the draft EIS to inform the community of all expected effects that would occur as a result of implementing BRAC.</p>			

Commenter	Comment #	Comment Type	Name
P40	P40.1	Private Citizen	Mark Gionet
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>In what might be considered a bit of transportation planning irony, on the other side of the county this evening, as part of the county's plans for redoing Tyson's Corner, Doctor Robert Savaro from the University of California is speaking, and he is probably one of the most nationally recognized experts on transportation planning, and Doctor Savaro came up with the notion of the jobs housing imbalance, which is, I think what 22,000 people are going to discover when they realize their job has just moved.</p> <p>So this is as a cause of major transportation congestion, and what that points to is that the county has, for Tyson's Corner, and when Metro goes to Tyson's, come up with a desire to really have a nationally recognized solution to the problem, and that's really what we need here is a national class solution to transportation issues, and it must include transit, it must include that commitment to, you know, HOV lanes, it must include transportation demand management, all elements that have to be worked into this EIS in much better form.</p>			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD.			

Commenter	Comment #	Comment Type	Name
P40	P40.2	Private Citizen	Mark Gionet
Section	Page Number	Organization	
4.3 Transportation			
Comment			
I would concur with the Secretary's earlier recommendation of transportation, that there be no record of the decision until all of these 13, and then I would have the 20 that Frank just mentioned, projects are, you know, identified, funded, and locked into place so that they are known things.			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD.			

Commenter	Comment #	Comment Type	Name
P40	P40.3	Private Citizen	Mark Gionet
Section	Page Number	Organization	
4.2 Land Use			
Comment			
I would also say that I agree with the previous suggestion that's made, that there be a real -- as part of the mitigation measures, a time table be included, that no jobs be moved until the improvements were in place, to accommodate those people going to those jobs, and finally, I think under transportation, though it falls into land use as well, the use of the GSA Warehouse should be considered, because that really seems to provide the clearest way to have to ready access to Metro, unless somebody can think of a way to have ready access to Metro.			
Response			
Use of the GSA site is being considered as part of the City Center Alternative. The EIS analysis assumes that the parkway will be built in time to accommodate the new organizations at EPG. Army is working diligently with the state to ensure that the parkway is completed on time. The Army will look at nonconstruction alternatives. The Transportation Demand Management Coordinator (TMDC) position is specifically designed for long-term traffic demand management for the Fort Belvoir complex. However, that individual will play a key role in developing and implementing interim solutions if transportation projects are not ready by September 2011.			

Commenter	Comment #	Comment Type	Name
P40	P40.4	Private Citizen	Mark Gionet
Section	Page Number	Organization	
4.2 Land Use			
Comment			
Under land use, decoupling this change in the land use plan for the installation from the BRAC process, I really disagree again, with – as many others have done, with the consolidation and to catch all land use categories. That does not seem to make good planning sense in a narrow, and most planning documents that are certainly done by the county and elsewhere, really seek to provide as much detail as possible to let people understand the vision of what's being planned, and that does not seem to be the case here.			
Response			
The updated land use plan in the FEIS reclassified land use categories from the 1993 Master Plan in accordance with Army Regulation 210-20 and the Army's Master Planning Technical Manual (MPTM). The Army is proceeding in an orderly and prudent manner to determine the future course of Fort Belvoir, while at the same time meeting the BRAC timeline mandated by Congress. Adoption of an updated land use plan is the first step in that process, but this EIS would not formally approve the RPMP update. Rather, revision of the post's Real Property Master Plan is underway, and follow-on NEPA documentation would analyze the environmental impacts of that plan.			

Commenter	Comment #	Comment Type	Name
P40	P40.5	Private Citizen	Mark Gionet
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
Issues of air quality are not well addressed.			
Response			
Information on air quality issues appear in Section 4.4 and Appendix E of the EIS.			

Commenter	Comment #	Comment Type	Name
P40	P40.6	Private Citizen	Mark Gionet
Section	Page Number	Organization	
4.7 Water Resources			
Comment			
Issues of water quality are not well addressed.			
Response			
The Army has carefully considered all relevant information available and is satisfied that the analysis is sufficient to guide sound decision making.			

Commenter	Comment #	Comment Type	Name
P41	P41.1	Private Citizen	Monica Thompson
Section	Page Number	Organization	
Other			
Comment			
I'm a community resident. I'm also a former soldier that left out of Fort Belvoir, so my perspective on this whole issue is very broad. I understand the needs of each stakeholder. We already had someone speak about creating a committee of those stakeholders who could, you know, come in and make sure everybody from that stakeholder group's perspectives are represented and issues are raised.			
Response			
As prescribed by Council on Environmental Quality regulations and Army policies, the Army has conducted its environmental analysis process and path toward decision making openly with the public and interested federal, state, and local agencies. In addition to a scoping meeting at the outset of the NEPA process, the Army has held other public meetings to enable the public to be informed of relevant issues. The Army extended the public comment period on the draft EIS to 60 days to allow thorough review by the public and agencies. The Army has also hosted a "Board of Advisors" to keep community leaders informed of the status of BRAC. At neighborhood groups' request, the Army has provided knowledgeable personnel to appear at meetings to allow residents to ask questions and better understand the Army's proposals. These measures have been beneficial because they have enabled the Army to be aware of and sensitive to community concerns. As circumstances warrant, the Army can provide further opportunities for community awareness.			

Commenter	Comment #	Comment Type	Name
P41	P41.2	Private Citizen	Monica Thompson
Section	Page Number	Organization	
Other			
Comment			
My question is, or my concern is, with the influence of so many people and the sensitivity of that influx in where we are, as far as our nation is with the war on terror, has there been much attention paid to the vulnerability or the risk that we're going to take on with so many soldiers and people, or civilians, moving into this area. What is the level of risk that we're going to take on and what is the mitigation to that? Has that been discussed? With this war on terror and so many people being in this area, and what Belvoir means to us. So the security and the safety of the residents has increased with so many people coming into the area.			
Response			
The draft EIS presents information on Force Protection Conditions and security implications in Section 4.3.8.			

Commenter	Comment #	Comment Type	Name
P42	P42.1	Private Citizen	Yolanda Nicholson
Section	Page Number	Organization	
4.8 Biological Resources			
Comment			
I'm a citizen of the area. I came to listen, not to speak, but I keep seeing in my mind the old TV commercial where the Native American has a tear running down his cheek because of what's happening to the environment.			
Response			
Thank you for the comment.			

Commenter	Comment #	Comment Type	Name
P42	P42.2	Private Citizen	Yolanda Nicholson
Section	Page Number	Organization	
4.8 Biological Resources			
Comment			
We're further down that road than we were. Undeveloped forested land is one of Fort Belvoir's greatest public resources. It is virtually irreplaceable if lost. In a time of disappearing natural resources, it is vital that green spaces be retained. Any plan that develops with the remaining space, should disturb the minimum number of wooded acres. Preserving these spaces is vital to the quality of life, and in fact, the very ability to sustain life. Fort Belvoir's green spaces are truly a national treasure. Please do all possible to retain them.			
Response			
Thank you for the comment.			

Commenter	Comment #	Comment Type	Name
P42	P42.3	Private Citizen	
Section	Page Number	Organization	
4.8 Biological Resources			
Comment			
I think that I shall never see a poem as lovely as a tree, providing quite, peaceful space to preserve a sense of sanity, a home of wildlife, an air cleaning factory, and erosion control.			
Think twice before clearing or even opening any land.			
Response			
Thank you for the comment.			

Commenter	Comment #	Comment Type	Name
P43	P43.1	Private Citizen	Earl Flanagan
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>But I want -- they are still proposing in the draft EIS one parking space per employee, and all that does is to encourage single occupancy vehicles, because if you have got your own parking space, I mean, why use public transit or why do car pooling?</p> <p>They need, this EIS, needs to have in it the outlines of a plan that will dissuade or there should be a purposeful plan to dissuade single occupancy vehicles such as single occupancy, all the single-occupancy vehicles would have to park out of doors in the rain, in the snow and have to remove all the sleet from their windshields. This prompts -- and then all the carpools will be indoors, where it is heated and their parking spaces are right up there next to the entrances.</p> <p>There has to be a plan at least sketched out in the EIS that says how they are going to dissuade single-occupancy vehicles. And then there should be a requirement -- I'm surprised if there isn't an Executive Order -- that you can only provide 80 percent of parking for 80 percent of your employees or something like that. There are other aspects of the EIS that I would like to make comments on, but I think this one in particular, the proposal that's in the EIS, is just, I don't know any way of describing it except repulsive. This is the most repulsive statement I have ever read in an EIS, proposing to park or to plan for one parking space per employee, just repulsive.</p>			
Response			
<p>Adoption of the traffic demand management program and hiring appropriate staff to manage it will be addressed in the Record of Decision. The ROD will also indicate which transit services will be adopted, as appropriate. Funding of transportation projects will also be addressed in the ROD. Parking spaces are being provided at a ratio of 6 spaces for every 10 employees for new development.</p>			

Commenter	Comment #	Comment Type	Name
P43	P43.2	Private Citizen	Earl Flanagan
Section	Page Number	Organization	
Other			
Comment			
<p>And whoever prepared this EIS for the Department of Defense -- I hope it wasn't your firm -- anyway, the Department of Defense has been snookered. I mean, they have really been -- this is, this EIS is full of maybes and ifs and wouldn't it be nice to and all those kind of motherhood statements that are not worthy of the Federal government, in my opinion, and particularly the Army, which I'm a veteran of, and I don't think they should be doing this, hoodwinking the public. It appears to be a definite exercise to hoodwink the public.</p>			
Response			
<p>The Army believes a fair reading of the draft EIS should not lead anyone to conclude there has been any sort of intent to hoodwink the public.</p>			

Commenter	Comment #	Comment Type	Name
P44	P44.1	Private Citizen	Newman Howard
Section	Page Number	Organization	
Other			
Comment			
<p>I tried very hard in reading the Environmental Impact Statement to follow the rationale and the analysis of the individuals putting this statement together. My problem with the statement is it appears that the contractor farmed various parts of the statement out to different teams and they went off to do their analysis independently, and in all aspects of the Environmental Impact Statement, it is supposed to be a road map to where the proper ending should be. The road map of this Environmental Impact Statement is fraught with inconsistencies and what I consider inadequate analyses. If you try to follow the maps of the Environmental Impact Statement from one section to another or one table to another, the color coding on the maps will change without warning to the reader. In addition to that, the designation of the various facilities to be used within those color-coded areas will change in nomenclature, further confusing the reader. This troubles me from the standpoint that this particular Environmental Impact Statement is very important to all the residences of this part of Northern Virginia, and inconsistencies of this type serve to discredit the credibility of the entire impact statement.</p>			
Response			
<p>The Army believes it has done a credible job in presenting information in the draft EIS in an understandable format and regrets any difficulties the readers encountered.</p>			

Commenter	Comment #	Comment Type	Name
P44	P44.2	Private Citizen	Newman Howard
Section	Page Number	Organization	
Other			
Comment			
<p>I don't think that adequate consideration was given to many areas, particularly the hospital. I state one case on page 1-9, under Land Use. This Environmental Impact Statement considers the Engineer Proving Ground as a potential site for the new hospital. However, this proposal is categorically dismissed purely with the statement that a hospital located in this location would be too difficult to find. This, to me, is amateurish at best. I have pages of other inconsistencies, however, the more you write, the less people read, so short, sweet, this is my opinion, and I have other areas that I could discuss if anybody was interested.</p>			
Response			
<p>The cited passage from page 1-9 of the draft EIS reflects a comment received from the public during the scoping process for preparing the EIS rather than an assertion attributable to the Army. The summary of public and agency scoping comments were included in the document to demonstrate issues and concerns.</p>			

Commenter	Comment #	Comment Type	Name
P45	P45.1	Private Citizen	Joseph Bury
Section	Page Number	Organization	
Other		Townes at Manchester Woods Homeowners Association	
Comment			
<p>A. BRAC Needs to Ensure Transportation Funding Is In Place Prior to Move</p> <p>The DEIS describes a variety of alternative sitings for the influx of personnel and agencies to Fort Belvoir under the BRAC realignment plans. All these alternatives describe massive displacements of traffic in and around the Base and the neighboring communities. Each alternative purports to describe road improvements and changes to ameliorate the traffic increases. However, nearly all of the described road plans have one thing in common; they are not currently funded by the Army, the State of Virginia, or other agencies of the Federal government. Even if the described road plans might eventually be adequate to improve the traffic congestion from the base changes, it is highly unlikely that funding for road plans will be in place for the planned moves to Fort Belvoir in 2011, much less in time for the road construction to be completed by 2011. Without timely funding and construction completed before the planned move-in dates, not only will the road congestion around the base be horrendous until the road improvements are completed, but the construction process will make it immeasurably worse.</p> <p>Despite the statutory requirements of BRAC, no alternative for the realignment should be approved without funding being in place and plans set for road construction to be completed before large numbers of personnel will move to the base. If there is a legal impediment to this common sense approach to BRAC planning, Congress should be asked to both extend the time for completion of the BRAC moves and to fund the needed road projects.</p>			
Response			
<p>The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD. The Army will continue toward implementation of BRAC by September 15, 2011, as required by law.</p>			

Commenter	Comment #	Comment Type	Name
P45	P45.2	Private Citizen	Joseph Bury
Section	Page Number	Organization	
4.3 Transportation		Townes at Manchester Woods Homeowners Association	
Comment			
<p>B. BRAC Needs to Present a Workable Plan for Dealing with Traffic Congestion</p> <p>The HOA notes that no matter which alternative is approved and despite any road improvement and changes suggested for each alternative being contemplated, road congestion around Fort Belvoir and the adjacent communities will be greatly increased during peak travel hours. The HOA does not believe that the DEIS proposes adequate amelioration of this traffic congestion. Traffic in all of Northern Virginia is already unacceptably congested and if complicated by the addition of any of the DEIS proposals, traffic congestion around the base will only worsen. Further, the solutions proposed in the DEIS are inadequate in terms of presenting workable alternatives. Nor does the DEIS suggest from where the necessary funds to ultimately fix the congestion will come. The move of so many personnel to Fort Belvoir will create monumental traffic problems, for which the Army has no sure answer. This plan should not be approved and construction begun until these problems are completely addressed and the solutions properly funded.</p>			
Response			
<p>DEIS proposes mitigations such that the traffic conditions are no worse under the proposed action compared to the No Action Alternative. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD.</p>			

Commenter	Comment #	Comment Type	Name
P45	P45.3	Private Citizen	Joseph Bury
Section	Page Number	Organization	
4.3 Transportation		Townes at Manchester Woods Homeowners Association	
Comment			
<p>II. Engineering Proving Grounds (EPG)-Specific Issues</p> <p>The TMW development backs up to the EPG, so we have a greater interest in plans to utilize the EPG than in plans for projects on other parts of Fort Belvoir. Under either the Preferred Alternative or the City Center alternative, large numbers of personnel will be moved to the EPG. The comments below are directed at both alternatives, because, despite differences in the locations of various agencies under the two alternatives, the impact on the TMW will be very similar. New roads and entry points for the EPG will be built under both alternatives and the difference in impact on the lives of TMW residents will be one of degree, but not of significant substance. If asked to choose between the two alternatives, the TMW HOA would prefer the City Center alternative, as it will site fewer personnel on the EPG and will provide much better access to mass transit for agencies sited in the GSA area, but the disruption to the TMW will be significant in either case.</p>			
Response			
<p>The Record of Decision will determine which Land Use Alternative will be selected and implemented. Comment is noted of the land use alternative that the HOA prefers to be selected.</p>			

Commenter	Comment #	Comment Type	Name
P45	P45.4	Private Citizen	Joseph Bury
Section	Page Number	Organization	
4.3 Transportation		Townes at Manchester Woods Homeowners Association	
Comment			
<p>A. Traffic Congestion Increased</p> <p>The influx of 17,700 to 11,700 personnel to work on the EPG will create traffic congestion on the roads around the EPG, including the area around the TMW, to an extent which may well make TMW residents virtual prisoners in their homes during peak traffic hours, unless they are willing, or have, to brave interminable waits on the exit roads. These same residents will be exiled from their homes, when they want to return home in the evenings. The exit to the Franconia-Springfield Parkway from TMW already backs up and is congested in the morning. With opening of the EPG to several activities and the move of access to the parkway for TMW to Neuman Street, exiting the neighborhood will become much worse (for one major reason, see the next paragraph). Even in the unlikely event that the planning for traffic around the EPG might ultimately be adequate, we renew our objection that there is currently no funding for many of these improvements and that no moves should be undertaken until all the road improvements are funded and their construction completed.</p>			
Response			
<p>The Neuman Street access will be approved only if the interchange on Franconia-Springfield Parkway is accepted as a mitigating action. Further detail on design will be developed to mitigate these concerns if the Record of Decision adopts this access as an access point.</p>			

Commenter	Comment #	Comment Type	Name
P45	P45.5	Private Citizen	Joseph Bury
Section	Page Number	Organization	
4.3 Transportation		Townes at Manchester Woods Homeowners Association	
Comment			
<p>B. TMW Highway Access Severely Restricted</p> <p>As envisioned by the DEIS, traffic from TMW will be re-routed from Hooes Road into the Bonniemill Lane neighborhood to get to Neuman St. Neuman St. is to be turned into a busy four lane thoroughfare for access to the EPG from the Parkway. To exit the Bonniemill Lane Neighborhood, TMW residents will constantly have to compete with thousands of EPG employees on Neuman St. for access to the Parkway. The blocking of Hooes Rd. at Neuman St. will greatly increase local traffic on the side streets in the local neighborhoods, decreasing safety for local children. The DEIS plans in this regard take no account of these issues for the EPG's northerly neighbors.</p> <p>As mitigation of some of this issue, the TMW believes that the Hooes Rd access into Beverly Forest through Constantine Ave. should be reopened. With the other roadway changes, Parkway traffic will no longer be tempted to take this route as a shortcut, but it would greatly improve access for TMW residents. It also might be appropriate to provide additional access to TMW through Norman Pl. from Bonniemill Lane.</p>			
Response			
<p>The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. The entrance to EPG via Neuman Street is envisioned as a peak hour entrance only. If the HOA desires to reopen that road, it is recommended it contact VDOT and the County to initiate dialogue with the adjacent neighborhoods to reopen the road and construct traffic calming to discourage cut-through traffic.</p>			

Commenter	Comment #	Comment Type	Name
P45	P45.6	Private Citizen	Joseph Bury
Section	Page Number	Organization	
4.2 Land Use		Townes at Manchester Woods Homeowners Association	
Comment			
<p>C. Boundary Setbacks</p> <p>The DEIS contemplates that BRAC construction will be at least 400-800 feet from existing homes. The TMW believes that 800 feet should be the minimum separation between homes and EPG construction. This might be accomplished by ensuring that there is no construction outside the internal loop road envisioned on the tentative EPG planning maps. We would ask that as big an area as possible of natural woodland be preserved between TMW homes and the new facilities on the EPG. Some sort of recreational use preserving the natural habitat might be put in this area, i.e. walking trails.</p>			
Response			
<p>The Army will attempt to retain as much of a buffer as possible to meet AT/FP guidelines as well as a visual barrier between proposed buildings and outside structures. However, it is not always possible to keep an 800-foot buffer.</p>			

Commenter	Comment #	Comment Type	Name
P45	P45.7	Private Citizen	Joseph Bury
Section	Page Number	Organization	
4.5 Noise		Townes at Manchester Woods Homeowners Association	
Comment			
<p>D. Construction Noise and Scheduling</p> <p>Because of the TMW neighborhood's proximity to the EPG, we ask that construction on the EPG be limited to Monday through Friday with work hours not to exceed 0600-1800 hrs. Any greater work period will severely adversely affect the rest and relaxation of TMW residents.</p>			
Response			
<p>The Army cannot commit to restrictions outlined in the comment while meeting the 2011 end date mandated by BRAC legislation. However, the Army would implement BMPs outlined in the EIS. The Army will limit construction to predominately occur during normal weekday business hours in areas adjacent to noise-sensitive land uses such as residential areas, recreational areas, and off-post areas. Information on matters outlined in the comment appear in Section 4.5.2.3.</p>			

Commenter	Comment #	Comment Type	Name
P45	P45.8	Private Citizen	Joseph Bury
Section	Page Number	Organization	
4.8 Biological Resources		Townes at Manchester Woods Homeowners Association	
Comment			
E. Displacement of Wildlife			
The DEIS does not adequately address the displacement of wildlife from the construction on the EPG into the surrounding neighborhoods. The DEIS should be amended to make provision for properly managing the movement of wildlife from this now largely wild area into adjacent areas before they become a nuisance to area residents.			
Response			
The amount of wildlife displacement cannot be easily predicted. As a large portion of EPG would remain undeveloped and, thereby remain suitable habitat, it is unlikely there would be a complete movement out by wildlife.			

Commenter	Comment #	Comment Type	Name
P46	P46.1	Private Citizen	Dennis Steiner
Section	Page Number	Organization	
4.13 Hazardous Waste		NGA	
Comment			
What assurances will be available that ALL hazmat and unexploded ordnances will be completely eradicated from the EPG area before construction is completed? I know that the Army did not do their homework when they closed Ft. Richie, Md some years ago. The new owners were ready to start construction and the Army said, NO, we have to check for unexploded ordnance. This area seems to be more of a concern than the one mentioned.			
Response			
The Department of Army will under take all appropriate UXO and remediation requirements before development.			

Commenter	Comment #	Comment Type	Name
P47	P47.1	Private Citizen	Linda Stone
Section	Page Number	Organization	
4.3 Transportation			
Comment			
I am concerned about the traffic on Pohick/Rolling Rd between Richmond Hwy (RT1) and the Engineer Proving Grounds (EPG). Currently, many Belvoir employees who work on Belvoir travel from the south and use RT1 to reach Ft Belvoir. I believe many of them, who will commute from the south, will continue to use RT1 and will turn onto Pohick Rd to reach the EPG. When I mentioned this concern during the informal period at the 17 April 07 meeting, the transportation representative told me it was envisioned that the traffic would travel on Interstate 95 and reach the EPG from that highway. What happens when there is traffic congestion on Interstate 95? This happens at least once a week now and will probably increase with the increased number of commuters. Currently the traffic moves over to RT1 to avoid Interstate 95. I believe they will then use Pohick/Rolling Rd to reach the EPG. I don't see any plans in the DEIS to widen Pohick/Rolling Rd or in some way address the increased traffic.			
Response			
Rolling Road has been added to the list of identified possible mitigation actions for the Preferred and City Center Alternatives (see Sections 4.3.4.4 and 4.3.6.4).			

Commenter	Comment #	Comment Type	Name
P48	P48.1	Private Citizen	John Sperling
Section	Page Number	Organization	
4.3 Transportation			
Comment			
As a resident of the Springfield area where I live and work, the quality of life within the area surrounding the Ft Belvoir complex to include the Engineering Proving Ground (EPG) will be greatly impacted by the BRAC. The nearly 22,000 new workers that are slated to be relocated to Ft Belvoir will face a 12 hour per day traffic jam with peak commuter traffic seeing a three-hour delay entering and exiting the post. The personnel addition at Ft Belvoir is the equivalent of re-sighting the Pentagon at Ft Belvoir! The key difference is the Pentagon was built more than 60 years ago with the focus on moving ~ 25,000 into the area each day.			
Response			
See the response to Comment L19.1.			

Commenter	Comment #	Comment Type	Name
P48	P48.2	Private Citizen	John Sperling
Section	Page Number	Organization	
4.3 Transportation			
Comment			
Being a resident of Springfield and actively involved with the revitalization of the area, one must be concerned with the drain and negative impact BRAC will have on the growth of commercial business development within the central part of Springfield. With three major redevelopment programs on the horizon, the full implementation of BRAC could delay or halt any or all of these projects. With the announcement and beginning of the Springfield Mixing Bowl project, the second largest public works project outside of the Boston Tunnel Project, property values for commuters within a few miles of the Mixing Bowl were impacted by a seven to ten or greater percent reduction in property values that took many years to recover. We in the Springfield area want our community to be a place to go to rather than a place to go through. With the imposed traffic congestion at Ft Belvoir, business and residential opportunities will avoid Springfield for it will be far too hard for these businesses to compete with the facilities on the base. Like the Pentagon and other encapsulated military communities the people who work on-site will eat and stay on site for it will be too hard to travel off base and return in a reasonable time.			
Response			
See the response to Comment L19.2.			

Commenter	Comment #	Comment Type	Name
P48	P48.3	Private Citizen	John Sperling
Section	Page Number	Organization	
4.3 Transportation			
Comment			
One reason for the move from current secure locations to Ft Belvoir was the issue of terrorist attacks. Under consideration for development at Ft Belvoir is the building of two bases split by one of the busiest interstate highways in the nation. Interstate 95 becomes a traffic jam and comes to a halt in the morning as well as in the evening. During peak weekend and holiday travel times, it often takes hours to travel less than 30 miles. Splitting the development between Ft Belvoir and the EPG will require duplicate security forces, duplicate fire protection, duplicate fitness and day-care centers as travel between the two facilities would be stalled by either I-95 or the Springfield-Franconia Parkway. The division of forces (and facilities) is contrary to military teaching that goes back thousands of years to the great military philosopher Sun Tzu.			
Response			
See the response to Comment L19.3.			

Commenter	Comment #	Comment Type	Name
P48	P48.4	Private Citizen	John Sperling
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>If the real concern for the environment is evaluated, then the addition of a southern platform at the Springfield-Franconia METRO and VRE terminal would be an ideal solution. Building a south terminal platform and staying with the Town Center Alternative would allow for the maximum utilization of mass transportation. Traveling south from the new south platform, shuttle buses could travel a newly built and improved road directly from the METRO/VRE into Ft Belvoir without getting onto the Springfield-Franconia Parkway or crossing over I-95. All the current plans for sighting the additions to Ft Belvoir, except the Town Center Concept and not building of a south platform or terminal, forces all mass transit travelers to come onto the Parkway and greatly impacting the current heavy traffic on the roadway. Of each dollar Northern Virginia residents send to Richmond less than 19 cents comes back to area where road improvements are desperately needed as the current transportation networks are choked to the breaking point.</p>			
Response			
<p>Comment noted. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. Funding of transportation projects will also be addressed in the ROD.</p>			

Commenter	Comment #	Comment Type	Name
P48	P48.5	Private Citizen	John Sperling
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>The road improvements maps have cut short many of the surrounding areas where road construction is planned or recommended. Several maps that are shown or used at briefings cut short many areas on the northern edge of the EPG grounds where new road improvements or construction is seen. Recommend that the maps more correctly show areas outside the immediate areas of potential use by the BRAC relocations.</p>			
Response			
<p>See the response to Comment L19.5.</p>			

Commenter	Comment #	Comment Type	Name
P48	P48.6	Private Citizen	John Sperling
Section	Page Number	Organization	
Other			
Comment			
<p>Keeping all the construction on the east side of I-95 greatly impacts the ability to provide inter as well as intra base transportation. Transportation links could easily be built to handle this type of inter as well as intra base needs. Links to the METRO and other commuter lots or nodes would be greatly improved by using the single base concept. Splitting bases only adds to the mix and doubles the inter and intra base transportation problem. Larger entry and inspection access points could be built verses the need to build more in number for a two base concept.</p>			
Response			
<p>If selected, the Satellite Campuses Alternative or Town Center Alternative would result in BRAC implementation only on the east side of I-95, as urged in the comment.</p>			

Commenter	Comment #	Comment Type	Name
P48	P48.7	Private Citizen	John Sperling
Section	Page Number	Organization	
Other			
Comment			
<p>To better support the Town Center concept of development, Davison Army Airfield needs to be part of the new Ft Belvoir build-up. Davison Airfield is a very limited use facility. The Ft Belvoir installation commander has repeatedly referred to the air strip as a VIP or executive use facility. Less than 150 cars can be found on the airfield on any particular day and should it rain that day, the number is cut in half. It is termed a limited use facility by the FAA for it has few navigational aids. The least amount of weather causes the airfield to close to all traffic. As for the field tenants, all could be easily moved to other nearby locations. The DC Army Guard should be moved to Reagan National Airport after all general aviation users were moved from the airport. The Guard's few assets would be closer to the DC National Guard headquarters if relocated to National IAP. The 12th Aviation Battalion could be moved to better serve the Army as their website talks of building clearing after natural or man-made disasters or crowd control at the Nation's Capitol Air Show at Andrews AFB, MD and lists few Army related Aviation activities. The VIP and executive traffic could and should be moved to Andrews where a whole VIP and protocol activity is currently in place. All the other activities at Davison could be moved to other parts of the base, Quantico, Andrews, National, or other bases. At a Congressional Oversight Hearing last year, the Assistant Secretary of the Army for Installation, when questioned about the use or potential use of Davison Airfield by Congressmen Davis, testified that Davison could be used as part of the BRAC relocation to Ft Belvoir if the Army found new locations for the current tenants at the airfield. The Army installation commander, the folks working the BRAC and others have not fully considered the use of Davison airfield in the BRAC process and should be encouraged to modify the Town Center Alternative for including the airfield. The inter and intra transportation modes to best support the single base concept would be better suited by the construction of a few bridges or tunnels to avoid impacting the civilian traffic on the four-lane section of the Parkway extension currently dividing Ft Belvoir/DLA and Davison Airfield.</p> <p>The reuse of Davison makes for a unified protection plan for Ft Belvoir and avoids the base split by I-95 and the protection of two large operation locations.</p>			
Response			
<p>Many variables-NGA, WHS, the hospital, and so on-allow a large number of possible combinations for siting of units, activities, and agencies on Main Post, EPG, or the GSA Site. Consideration of every possible combination is neither required nor desired for appropriate decisionmaking. Use of Davison Army Airfield is considered in the Satellite Campuses Alternative. The Army has a suitable, representative array of options from which a sound result can be obtained.</p>			

Commenter	Comment #	Comment Type	Name
P48	P48.8	Private Citizen	John Sperling
Section	Page Number	Organization	
Other			
Comment			
<p>The reuse of Davison Airfield leaves the EPG section for the Army Museum, a Fairfax County Park, and other Army culturally-correct attractions. Like the Marine Corps Museum at Quantico --- easily seen from I-95, an easily acceptable Museum would greatly improve the number of people who would consider attending the Army Museum. To say that the Army Museum attracts the same type of folks who might be visiting George Washington's Mt Vernon is using some very fallacious logic. The type of visitors to the Army Museum are the veteran, retired and service-associated folks who visit the Marine Corps Museum or the Air Force Museum at Wright-Patterson AFB, OH.</p>			
Response			
<p>See the response to Comment P48.7. A final decision on siting of the museum will not be made until completion of environmental analysis of that proposal. Demographics or interests of visitors are not yet well understood.</p>			

Commenter	Comment #	Comment Type	Name
P48	P48.9	Private Citizen	John Sperling
Section	Page Number	Organization	
Other			
Comment			
<p>In addition to the above-mentioned issues, the BRAC Ft Belvoir have yet to address the GSA Warehouse, Springfield, VA, as a possible location for the new hospital at Ft Belvoir. At the BRAC April 17th Public Meeting, many federal and state elected officials mentioned the relocation of Walter Reed Medical Center not to Ft Belvoir as seen in the BRAC proposal, but to the GSA Warehouse site. Closer to METRO and other transportation nodes as well as the NOVA Medial training site, no one has looked at the hospital relocation options.</p>			
Response			
<p>None of the Army's proposals for implementing BRAC would place the hospital at the GSA site. This was considered during the initial siting studies, however, the site did not meet mission requirements. Among other factors considered was the need for facilities on Fort Belvoir proper. Possible action by the Congress with respect to Walter Reed Army Medical Center is unclear.</p>			

Commenter	Comment #	Comment Type	Name
P49	P49.1	Private Citizen	John Cooley
Section	Page Number	Organization	
4.3 Transportation		Civic Association of West Springfield Village	

Comment

Our 423 home subdivision is within 1.2 miles of the current EPG entrance off Rolling Road. Any additional traffic moving north along the connected Fairfax County Parkways or additional commuter traffic along Rolling Road to job sites on the EPG will practically land lock us in our West Springfield Village and the Winter Forest Community immediately adjacent and south of us. The road is currently max'd out during rush hour traffic and it's nearly impossible to make a left hand turn onto it from our side streets.

Rolling Road is scheduled for widening to four lanes starting in 2013, but it should be completed before the EPG opens for business. So we have an issue with the timing of the projects (BRAC moves to EPG, connection of the Parkways and scheduled completion of the project to widen Rolling Road). Should be an easy fix:

- 1) Cause VDOT and our County Supervisors to move Rolling Road up to be completed by 9/2011.
- 2) Upgrade that northern ramp interchange off what is now Rolling Road onto westbound Fairfax County Parkway. That single lane ramp will not be able to accomodate additional EPG traffic or traffic from the connected parkways. It also needs to be improved well before the BRAC completion date.If not, even more frustrated traffic will continue north along Rolling Road further exacerbating our dilemma.

The Draft EIS also states that "Any significant traffic effects as a result of the BRAC action should be mitigated with transportation improvements, such that the negative effects become minor or negligible." Though the immediate impact of occupying the EPG will not be the primary contributor to congestion along Rolling Road, the requisite connection of the two segments of the Fairfax County Parkways will be. VDOT had advertised their desire to put an interchange from I-95 onto the Fairfax County Parkway. That will certainly increase traffic volume past the EPG and onto Rolling Road. the two are connected as will your mission be connected to VDOT.

Strongly urge you to include the single lane interchange and widening of Rolling Road as critical and necessary transportation projects to make the BRAC occupation of the EPG a mission success.

Response

Local improvements identified in the DEIS have been further defined and include intersection improvements along Rolling Road and are included in the list of mitigation actions for the Preferred and City Center alternatives (Sections 4.3.4.4 and 4.3.6.4). The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. Funding of transportation projects will also be addressed in the ROD.

Commenter	Comment #	Comment Type	Name
P50	P50.1	Private Citizen	Jodi Lasky
Section	Page Number	Organization	
4.3 Transportation			

Comment

I am amazed, appalled, and confused as to why straightening and widening Rolling Rd is considered beyond the Constrained long-term plan of the road improvements, and Fullerton Rd is not mentioned. With no traffic whatsoever at the EPG, the light at the corner of Fullerton and Rolling backs up (down both streets) incredibly badly at rush hour. The number of accidents on the section of Rolling Rd next to the EGP is already ridiculous. And yet, roads that are NOT near the EPG are given more consideration (Beulah, Telegraph, Lorton, and Newington Roads, for instance) then those expected to get an additional 18000 workers.

I understand that the assumption is that individuals will use the major roads; however, at rush hour, they will use whatever road they can get to, which very much includes both Rolling and Fullerton.

I own 2 townhouses in the affected area: one in Saratoga, and one in Shadowbrook. I can tell you, from personal, daily commuting experience, that failing to widen Fullerton to 2 lanes in each direction (and three at the Rolling Rd light) and straightening and widening Rolling to at least 2 lanes in each direction will cause the roads to completely shut down with traffic at the major commuting times.

Response

Rolling Road has been added to the list of mitigation actions for the Preferred and City Center Alternatives (Sections 4.3.4.4 and 4.3.6.4).

Commenter	Comment #	Comment Type	Name
P51	P51.1	Private Citizen	Arlene Dukanauskas
Section	Page Number	Organization	
Other			
Comment			
<p>I object to the movement of agencies that are currently in leased buildings in Alexandria and Arlington moving to Ft. Belvoir or anywhere in the local area that has no immediate access to existing public transportation. The leased facilities with available subway/bus transportation have served DOD and the Federal Government very well in the past three decades. The Metro access of these facilities has kept thousands of cars off the roads and decreased pollution and traffic. The proposal requires additional millions of dollars in road improvements and will unnecessarily increase traffic and pollution. The Northern VA area is already in a crisis mode with traffic and congestion. Organizations such as WHS and others that are part of a headquarters activity in the Pentagon need to be physically close to the building or they will be spending half the day in travel status. DOD employees are as secure as other Federal government employees in leased facilities. As a taxpayer, I do not support this plan, and I have voiced this concern to my elected representatives.</p>			
Response			
<p>The BRAC Commission considered the statutory criteria listed in Section 1.6.1 in recommending realignment of Fort Belvoir and relocation of personnel to the installation. As neither the President nor Congress disturbed those recommendations, the Army must now carry out their implementation.</p>			

Commenter	Comment #	Comment Type	Name
P52	P52.1	Private Citizen	Catherine Rubino
Section	Page Number	Organization	
Other			
Comment			
<p>I am most concerned about the impact that BRAC will have on our forests, wetlands, and open space. I believe that overdevelopment and the loss of our trees have caused flooding and severe deterioration of our environment. This situation can only get worse. Implementation of the BRAC initiative is happening too quickly. I don't believe the Federal Government has adequately coordinated with organizations responsible for caring for wetlands, forests, and wildlife. When implementing BRAC in the Fort Belvoir area, I hope we do all we can do to preserve open space and green areas. There is so much history and beauty that will be lost with the destruction of these areas.</p>			
Response			
<p>The draft EIS identifies potential effects on 12 resources areas and appropriate best management practices and mitigation. Effects caused by construction are discussed relative to BRAC implementation.</p>			

Commenter	Comment #	Comment Type	Name
P52	P52.2	Private Citizen	Catherine Rubino
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>To the extent the pursuit of non-BRAC mandated projects impair the environment or worsen traffic, they should be significantly reduced or eliminated. Thank you very much.</p>			
Response			
<p>Comment noted.</p>			

Commenter	Comment #	Comment Type	Name
P53	P53.1	Private Citizen	Terry Bowers
Section	Page Number	Organization	
Other			
Comment			
<p>While NEPA allow the Army to maintain discretion over whether to hold public hearings during the EIS process, I find this method of a single public hearing is highly objectionable. The fact that the EIS affects Fairfax County's largest employer, an estimated 300,000 local residents in Fairfax County alone, untotaled nearby residents(DC/VA/MD) and 22,000 employees moving to the base. Yet the Army has one hearing scheduled for 90 minutes at the local high school.</p> <p>I will be out of town but would expect a media circus and political grandstanding as opposed to a dialogue and comment session for the local public. Both the Army and Fort Belvoir are clearly missing an opprtunity to reach out and communicate directly with the affected public on this significant "proposed" action. The Army should be holding at least 3-5 public hearings in Fairfax County alone.</p>			
Response			
<p>The public involvement component of NEPA provides for publishing a notice of intent to prepare an EIS, public scoping, and opportunity to comment on a draft EIS. These measures give local communities a voice in the decision-making process. The Army is satisfied that its public hearing on the draft EIS and other outreach activities have provided adequate opportunity for public involvement in the decision-making process.</p>			

Commenter	Comment #	Comment Type	Name
P54	P54.1	Private Citizen	Thomas Kays
Section	Page Number	Organization	
Other			
Comment			
<p>As a lifelong resident of Fairfax County, I am concerned about the effects of Base Realignment and Closure (BRAC) at Fort Belvoir, including adverse impacts to Route 1 and I-95 traffic, regional air quality and the loss of natural environment along Accotink creek. I question whether the full magnitude of BRAC impacts an Fairfax County have been fully and adequately evaluated within the BRAC Draft Environmental Impact Statement (DEIS) and would like to see, the resulting Record of Decision (ROD) document commit to specific, comprehensive and binding mitigation actions on the part of the Department of the Army.</p>			
Response			
<p>Consistent with Council on Environmental Quality regulations and Army policy, the Army will identify in the Record of Decision those measures which will be undertaken to mitigate impacts related to its proposed actions.</p>			

Commenter	Comment #	Comment Type	Name
P54	P54.2	Private Citizen	Thomas Kays
Section	Page Number	Organization	
Other			
Comment			
<p>As a Fairfax County taxpayer and homeowner in the Mount Vernon District and as a local utility ratepayer I am also concerned that I will be severely burdened by traffic gridlock, effectively blocking Fairfax County residents access to Route 1 / I-95 to the south each workday, by higher state and federal taxes to address this situation, and by higher utility rates to cover the utility infrastructure triggered by BRAC construction at Fort Belvoir. These sacrifices seem to be on the verge of being decided by the Army without my consent, and without the knowledge or consent of the voters in Fairfax County.</p>			
Response			
<p>To the extent allowed by law, the Army will seek funding to alleviate effects on traffic. As numerous factors can negatively or positively affect utility rates, the Army declines to speculate on any changes to them.</p>			

Commenter	Comment #	Comment Type	Name
P54	P54.3	Private Citizen	Thomas Kays
Section	Page Number	Organization	
Other			
Comment			
Please consider making corrections to the environmental analysis for BRAC at Fort Belvoir as addressed below, and see that the resultant ROD and my subsequent Finding of No Significant Impact (FONSI) do include specific actions that the Department of the Army commits to accomplish in a timely manner that avoid, minimize, mitigate and off-set environmental and socioeconomic impacts. Additionally, I am requesting that the ROD and any subsequent FONSI include clear and specific fiscal commitments by the Department of the Army to fund all concomitant local and regional transportation improvements, utility/infrastructure upgrades, new schools and other safety and social services that this Federal action invokes in support of BRAC development at Fort Belvoir.			

Response
Consistent with Council on Environmental Quality regulations and Army policy, the Army will identify in the Record of Decision those measures that will be undertaken to mitigate effects related to its proposed actions.

Commenter	Comment #	Comment Type	Name
P54	P54.4	Private Citizen	Thomas Kays
Section	Page Number	Organization	
Other			

Comment			
The magnitude of planned land development and the huge number of incoming DOD personnel multiplied by their contract support staff as commanded by BRAC at Fort Belvoir will bring significant adverse impacts to Route 1/I-95 traffic, air quality and the natural resources of this region, yet the benefits of this development are secured behind the base perimeter, not generally open to civilians. It would be unfair for the Army to contribute to the woes of this region without knowing or fully appreciating their impact, magnitude, nor engaging in meaningful discussion and planning with Fairfax County officials to commit to concrete measures to alleviate the burden Army actions cause for neighbor's to Fort Belvoir. Understandably, details about incoming elements of BRAC as well as the timing of BRAC implementation, are beyond the scope of the DEIS.			

Response
The draft EIS provides senior Army leadership necessary analyses for an informed decision. Through means such as the Board of Advisors, the Army has maintained an effective dialogue with local elected officials.

Commenter	Comment #	Comment Type	Name
P54	P54.5	Private Citizen	Thomas Kays
Section	Page Number	Organization	
DOPAA			

Comment			
I believe that the scope of the Federal decisions to be evaluated within the DEIS for implementation of BRAC at Fort Belvoir should be (1) the geographic placement of incoming elements and tenants within the whole of Fort Belvoir and (2) site-specific site plans design concepts, and operational concepts of the BRAC elements within each proposed geographic location of Fort Belvoir. The DEIS seems too conceptual in nature, lacking adequate specificity concerning this Federal action upon which Fairfax County impacts may be identified, discussed and impact mitigations defined. I found evidence of a cursory analysis of viable alternatives for Decision Part (1), but apparently little to no analysis for Decision Part (2) was included. The absence of adequate analysis of the latter decision may not matter so much with regard to traffic impact. But regarding air quality and natural environment, this absence of meaningful alternatives analysis does render the DEIS incomplete. I suggest follow-on NEPA analysis, perhaps in the form of tired Environmental Assessments be undertaken to fully assess the environmental impacts of reasonable alternative site plans, conceptual designs and conceptual operations. For instance there would be much more impact to the natural environment if sprawling, low-rise campuses with surface parking and thereby large footprints are built within environmentally sensitive areas, rather than if sensitive environmental areas are better preserved through more consolidated, high-rise facilities, structured parking and shared facilities. The DEIS is silent at this level of alternative analysis.			

Response
Current planning by the Army does not envision low-rise, sprawling facilities and parking lots. Facilities footprints have been estimated and analysis conducted accordingly. The Army is satisfied that the development of the alternatives and the information provided by its analyses is sufficient to reach informed decision making.

Commenter	Comment #	Comment Type	Name
P54	P54.6	Private Citizen	Thomas Kays
Section	Page Number	Organization	
4.2 Land Use			
Comment			
<p>I especially disagree with the proposed Land Use Plan (LUP) that eliminates the long-standing designation of "Environmentally Sensitive" land. Elimination of "Environmentally Sensitive" land as a protected category from the Fort Belvoir LUP seems unneeded for BRAC implementation, and appears to weaken and reduce environmental restrictions on land development and to open up previously off-limits, conserved land to unrestrained development. The DEIS presents no compelling need for this change with regard to BRAC and I strongly request that the "Environmentally Sensitive" lands on Fort Belvoir protect two designated wildlife refuges, the Forest and Wildlife Corridor and bald eagle habitat on-post, along the Potomac River shoreline. These green areas are clearly environmentally sensitive and should remain designated as such, and stay off-limits to development sprawl. The heedless loss of significant wildlife corridors on Fort Belvoir will further stress wildlife and reduce its presence in contiguous areas of Fairfax County and about Mount Vernon where I live.</p>			
Response			
<p>The updated land use plan in the FEIS reclassified land use categories from the 1993 Master Plan in accordance with Army Regulation 210-20 and the Army's Master Planning Technical Manual (MPTM). In addition to regulatory protection requirements, environmentally sensitive areas remain protected by mitigations identified in environmental assessments and in the 1991 BRAC ROD. In addition, the project-siting process on Fort Belvoir evaluates both compliance with land use designations and potential other issues with sites. Areas identified as sensitive (i.e., RPAs, wetlands) still retain their regulatory protections. See the response to Comment L1.4.</p>			

Commenter	Comment #	Comment Type	Name
P55	P55.1	Private Citizen	Jerrold Allen
Section	Page Number	Organization	
4.9 Cultural Resources		Alexandria Friends Meeting at Woodlawn	
Comment			
<p>My chief concern with new development at Fort Belvoir would be the potential adverse impacts on the Friends Meetinghouse on Woodlawn Road where I worship regularly. It seems that one of the proposals - the Preferred Alternative - might have an adverse visual impact on that property. In particular, I am concerned that the Meeting be protected from adverse effects - visual, or noise, or traffic - from project #15, the Access Control Point. It appears that the City Center Alternative would be the best option for respecting the Meeting's interest.</p>			
Response			
<p>As indicated on each of the alternative maps, project 15 would be located at the same site regardless of which action alternative is chosen. Project 15 would produce minimal noise, traffic, and visual affects to the Woodlawn Meeting House. Detailed analysis of the potential effects of this project on the Friends Meetinghouse and other historic properties would be assessed through the Section 106 consultation process.</p>			

Commenter	Comment #	Comment Type	Name
P55	P55.2	Private Citizen	Jerrold Allen
Section	Page Number	Organization	
4.2 Land Use		Alexandria Friends Meeting at Woodlawn	
Comment			
<p>In addition, although not specific to my interest in the Meeting house historic property, I am concerned with the deletion of the "environmentally sensitive" category which protects substantial areas of the Base property.</p>			
Response			
<p>As stated in the response to Comment P18.4, elimination of the environmentally sensitive land use classification does not affect the degree of careful consideration the Army applies to all development projects, whether they are minor or major. Also see Comment L1.4.</p>			

Commenter	Comment #	Comment Type	Name
P56	P56.1	Private Citizen	Maggie Heninger
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>My family recently moved to W. Springfield for several reasons, including its accessibility to public transportation and schools. Since our move, we have been bombarded with negative news regarding BRAC actions at Ft. Belvoir. DoD claims that these realignments and closures are being made "to keep up with evolving global security requirements." I am deeply concerned that the inevitable severe traffic congestion around Ft. Belvoir's main base and the EPG site can only undermine our national security. How can we be secure if DoD employees are unable to get to their jobs because of clogged roadways? My concern is for both DoD employees and the general public who will have to deal with this on a daily basis. It is particularly disturbing that most of the 22,000-some employees will be working at the EPG site. It would seem wise to spread out the work sites, and make use of public transportation as much as possible. It seems obviously clear that certain transportation improvements need to be at or near completion before this realignment takes place. Our quality of life depends on it.</p>			
Response			
<p>The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD.</p>			

Commenter	Comment #	Comment Type	Name
P56	P56.2	Private Citizen	Maggie Heninger
Section	Page Number	Organization	
4.10 Socioeconomics			
Comment			
<p>I am also concerned with this massive influx of employees, more demands will be placed on schools. Many schools are already maxed out, with students having to take classes under less desirable conditions, such as in trailers.</p>			
Response			
<p>The revised/updated EIS Section 4.10.2.2.2 reflects the estimated student population in the NCR.</p>			

Commenter	Comment #	Comment Type	Name
P56	P56.3	Private Citizen	Maggie Heninger
Section	Page Number	Organization	
4.4 Air Quality			
Comment			
<p>Another issue of concern is how this will affect our natural resources, including our air quality. Traffic delays increase levels of ozone and particulate matter, leading to poorer air quality conditions.</p>			
Response			
<p>Comment noted. The EIS addresses these concerns in Section 4.4, Air Quality.</p>			

Commenter	Comment #	Comment Type	Name
P56	P56.4	Private Citizen	Maggie Heninger
Section	Page Number	Organization	
Other			
Comment			
<p>I hope that you seriously consider the concerns that many people have expressed. If done correctly and implemented within a reasonable time-frame, this region can successfully adapt to change.</p>			
Response			
<p>Thank you. The Army is working proactively and dilligently to address the concerns of the public so that the BRAC implementation at Fort Belvoir can be a successful one.</p>			

Commenter	Comment #	Comment Type	Name
P57	P57.1	Private Citizen	E.L. Tennyson
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>I took my basic military training at Fort Belvoir and now I live in Fairfax County where highway traffic is approaching gridlock. The BRAC program must face the reality of traffic problems and economic challenges as Ft. Belvoir adds 22,000 more employees.</p> <p>The Draft Environmental Impact Statement MUST face and meet the challenges of the problems of congestion, pollution, air quality, travel safety, oil supply and non-auto access to Fort Belvoir.</p>			
Response			
Comment noted. Impacts to transportation are evaluated in Section 4.3, and impacts to air quality are evaluated in Section 4.4.			

Commenter	Comment #	Comment Type	Name
P57	P57.2	Private Citizen	E.L. Tennyson
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>Three years ago Virginia's Department of Transportation thoroughly studied Richmond Highway US 1 through Fort Belvoir and found it hopeless. Public hearings were held and many testified about the need for Light Rail Transit on Richmond Highway. As a practical matter, Light Rail Transit may not be feasible south of Ft. Belvoir, but north to Huntington Avenue Metro Rail station and to Springfield Metro Rail Station is more than feasible. It is virtually essential.</p> <p>The VA DOT study found that the Bus Rapid Transit on Richmond Highway would reduce the capacity of that essential highway to move people. We cannot tolerate that. The Federal Transit Administration collects data which reveals that Light Rail Transit averages only 56 cents per passenger mile to move people but buses average 76 cents, 35 per cent more. We can not afford that. Worse, buses are less safe and less [?] reducing future revenue to help pay for the service. Terrorists use buses for bombing. Light Rail trains cannot be used by terrorists other than suicide bombers with personal small bombs.</p>			
Response			
Comment noted.			

Commenter	Comment #	Comment Type	Name
P57	P57.3	Private Citizen	E.L. Tennyson
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>With Light Rail, study finds that a single track in the median of US 1 can handle 1,200 peak hour passengers one-way plus as many who wish to travel in the lighter direction. That will add up to 12,000 per weekday, many times more then REX bus.</p> <p>Obviously, passing sideways will be required every two + miles but Sacramento has proven they can work very well. Pedestrian safety on US 1 is an oxymoron with bus, auto, and left turn lanes but center island Light Rail stations will greatly reduce the hazard but not eliminate it. Walk signals will be needed.</p> <p>Funding for Light Rail can come from the recently funded Northern Virginia Transportation Authority, from the Federal Transit Administration, from the Virginia Department of Rail & Public Transportation and from the Department of Defense.</p> <p>It would be best if Light Rail would not enter the Post on Belvoir Road to 12th Street to the Military Railroad right-of-way to Newington, Mosby Center, Heller Loop and Springfield with the main station at 12th Street. If the powers that be will not permit this for good and justified reasons, a military bus shuttle system from US 1 station will be required.</p>			
Response			
Comment noted.			

Commenter	Comment #	Comment Type	Name
P57	P57.4	Private Citizen	E.L. Tennyson
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>The prospect of HOT lanes on I-95 + I-395 has promoted the idea of express buses there but there are three fatal problems with using them to serve Ft. Belvoir.</p> <ul style="list-style-type: none"> 1 - Buses cannot stop on bus HOT lanes so few people can be served. 2 - The demand will not be there for individual bus routes. 3 - Buses are labor intensive and too costly for busy routes. <p>A few buses, such as from Fort Belvoir to Centreville or Dulles Airport may be highly desirable but that will not make a dent in the problem.</p>			
Response			
Comment noted.			

Commenter	Comment #	Comment Type	Name
P57	P57.5	Private Citizen	E.L. Tennyson
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>We may be talking about \$480 million here, of which \$384 million should be federal, mostly FTA but some DoD. The state and NVTA would split what remains to be raised. There is no better investment a taxpayer could make.</p>			
Response			
<p>The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD.</p>			

Commenter	Comment #	Comment Type	Name
P57	P57.6	Private Citizen	E.L. Tennyson
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>Some want to extend Metro Rail to Fort Belvoir but this is foolhardy. Metro Rail will be running eight car trains; six for sure, when Ft. Belvoir loads justify only two cars. The waste would be prohibitive. Metro Rail can not have several more convenient stations. Metro Rail will cost more to build to serve fewer people. That can not be justified. Money is and always will be a problem.</p>			
Response			
<p>Agreed. As mentioned in the response to Comment P15.1 the WMATA study examined a possibility of rail to Fort Belvoir and found it unfeasible. Please see Section 4.3.3.3 for more information.</p>			

Commenter	Comment #	Comment Type	Name
P57	P57.7	Private Citizen	E.L. Tennyson
Section	Page Number	Organization	
4.3 Transportation			
Comment			
<p>Since 1984 to 2004, FTA reports rail transit has attracted 50% more passenger-mile but bus transit lost a few passengers. Why depend on a higher cost loser? Why depend on Arab Muslim oil?</p>			
Response			
Comment noted.			

Commenter	Comment #	Comment Type	Name
P 58	P58.1	Private Citizen	Sylvia Seegrist
Section	Page Number	Organization	
Other			
Comment			
[Comment is illegible]			
Response			
The Army regrets that it cannot provide a response to the Comment because, as presented, it is not legible.			

Commenter	Comment #	Comment Type	Name
S1	S1.1	Elected Official	Vivian Watts
Section	Page Number	Organization	
4.3 Transportation		Virginia House of Delegates	
Comment			
Regional Impact - I urge the assertion be ignored that states there will be no additional regional work trips. That analysis on pgs 4-36 thru 4-37 likens the affect to reshaping a bean bag, stating that, as Army jobs are moved out of leased space in Crystal City, Reston, Bethesda, and so on, those offices will be filled by other workers currently working elsewhere in this region. Such an assertion simply does not comport with this region's office vacancy factor. Empty space is filled by a domino effect that does not leave empty space elsewhere. Building 6.2 million square feet of new office space will mean a commensurate net regional increase in jobs and therefore in work trips.			
Response			
The study team worked Fairfax County and VDOT to develop the appropriate land use plans that should be assumed for modeling purposes. It was determined that these future contractor tails represent speculation and that the current modeling tools do not provide the information or tools to assess these types of potential changes. Non embedded contractors are treated as visitors and are therefore included in the traffic assignments.			

Commenter	Comment #	Comment Type	Name
S1	S1.2	Elected Official	Vivian Watts
Section	Page Number	Organization	
4.10 Socioeconomics		Virginia House of Delegates	
Comment			
Such a net increase in jobs also will swell the region's housing sprawl more than has been assumed. In this robust economy, jobs drive growth. According to a recent George Mason University study, one of the reasons historically that this region has not adequately planned for its transportation needs is that, while job growth has been correctly projected, the number of households that will be created has always been underestimated. "[The Current Round 6.4A Forecast assumes 2.212 jobs/household...[the] Proposed Round 7 Forecast assumes 1.801 jobs/household...Reality is 1.6 jobs/household." (Washington Airports Task Force 07/06) The increased residential sprawl produced by creating a net increase in workspace for 22,000 jobs - 6.1 percent of the total employment in all of Fairfax County (pg 4-77) - will be substantial.			
Response			
Effects on employment and potential population changes are addressed in Sections 4.10.2.1.2 and 4.10.2.2.2. The analysis is based on the latest cooperative land use forecast (Round 7) for the Metropolitan Planning Organization.			

Commenter	Comment #	Comment Type	Name
S1	S1.3	Elected Official	Vivian Watts
Section	Page Number	Organization	
4.3 Transportation		Virginia House of Delegates	
Comment			
<p>The conclusion that the regional traffic impact will not be significant also assumes that, by September 2011, 50 percent of the personnel whose jobs will be relocated will shorten their commute by moving closer to EPG/Ft. Belvoir. Unless this assumption has been tested in a region with a comparably high proportion of two-income households, such an assumed re-location is overly optimistic. In fact, almost buried back on pg 4-338 is this very point "An employee's decision to move could depend on factors such as the location of a spouse's place of employment, changing a child's school district, proximity to family and friends, or cost of housing."</p> <p>Finally, the DEIS assumes that projects on VDOT's 6-Year Plan and on Fairfax County's CIP will be completed "within their respective time frames." (pg 4-62) First, I hope it is understood that being on the 6-Year Plan does not necessarily mean that a project will be completed within 6 years; it only means that some work will be taking place on that project within the next 6 years. With that clarification, a more critical issue is that the DEIS includes these projects in the baseline for determining the impact of adding 22,000 jobs. This is not appropriate. Projects currently on Virginia's 6-Year plan and Fairfax's CIP are being undertaken to add desperately needed regional capacity to alleviate traffic congestion, not to accommodate this massive BRAC relocation, which was not anticipated. Statements in the DEIS such as "hours of congestion along the 1-95 corridor are not expected to increase substantially...because the growth in demand would be less than 5 percent" (pg 4-80) should be stricken. 5% more vehicles in a supersaturated solution is total gridlock.</p> <p>Local Impact - What's puzzling is that just three pages beyond the declaration that a 5% increase in demand is not increase substantial, the DEIS declares "[i]n the areas immediately surrounding EPG, severe congestion lasting 3 to 4 hours would occur if mitigating actions, including transportation improvements, are not taken." This statement is the welcomed tough analysis I applaud.</p> <p>The DEIS then goes on to make a very strong case for - and hopefully a commitment to fund under the Defense Access Road Program (pg 4-137) - 14 essential transportation projects (including expanded bus service) costing \$458 million for the Preferred Alternative. I especially want to thank you for following through on my concerns about the critical need for a grade-separated intersection on the Franconia Springfield Parkway near Neuman. It is crucial that the detailed traffic analysis, which justifies all 14 expenditures as a cost of BRAC, not be over-ridden by sweeping summary statements elsewhere in the DEIS.</p> <p>Indeed, the DEIS is to be commended for recognizing that "state and local agencies require, for development they control, that the developer mitigate those effects with some improvement to the transportation system." (pg 4-137) Such routine, large developer outlays are over and above significant local and state fees and annual taxes that the military will not be paying. In this context, it is, indeed, appropriate, that the 14 mitigating transportation improvements be funded by the Army. State and local transportation funding will have to cover a myriad of other improvements necessitated by the BRAC re-location, such as dealing with significant problems that will be exacerbated on Rolling Road and Backlick Road.</p> <p>Timing - These transportation projects are critical to mitigate "reduced employee productivity, higher commuting costs, and degradation of quality of life...not limited to personnel...[but also] Through commuters and the local community." (pg 4-84) These projects are so critical that the relocation of employees to EPG/Fort Belvoir must not proceed until all of the direct bolt-on transportation projects are complete and the transit connections are operative.</p> <p>If the funding were guaranteed, it is possible that the engineering and design work, right-of-way acquisition, and road construction could be completed in four years. However, it is probable that required Environmental analyses and TPB air quality review will push completion of these transportation beyond September 2011. This is especially likely if getting TPB approval depends on the highly debatable assertion in the DEIS that "implementing the Preferred Alternative and the realignment of Fort Belvoir would decrease both the number of vehicles and the total VMT within the region." (pg 4-155) If this assertion is to be sustained in the air quality review, transit should be revisited, not only for VRE service from the south but also for personnel to be re-located who currently live in Districts A, B, G, H, and I, large portions of which are well-served by transit.</p> <p>In addition to requirements that may prevent essential transportation projects from being completed by September 2011, the DEIS notes a number of other reviews and approvals that must occur before site development and building construction can begin. These issues involve Chesapeake Bay protection areas, wetland preservation, petroleum storage, solid waste management, asbestos, and hazardous materials.</p>			
Response			
<p>The purpose of an EIS is to compare alternatives and select the best alternative based on factors such as environmental, transportation, costs, socioeconomics, etc. The Study Team worked with VDOT and Fairfax County to determine an appropriate distribution of households. Rolling Road has been added to the project list. Barta Road includes improvement to Backlick Road. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.</p>			

Commenter	Comment #	Comment Type	Name
S1	S1.4	Elected Official	Vivian Watts
Section	Page Number	Organization	
Other		Virginia House of Delegates	
Comment			
In view of these required procedures and the necessity to get Congressional funding for congestion mitigation projects, I would request that the Final EIS contain a timetable with specific actions that must be completed by dates certain or trigger a September 2011 occupancy being moved back accordingly. For example, the DEIS states "The peak year of [construction and renovation] expenditures would be 2008" and Table 4.10-9 lays out subsequent expenditures year by year. The construction projects used to generate this table should be listed on a critical path to actuate decision(s) to extend existing leases so that the movement of personnel to EPG and Fort Belvoir will be delayed until building construction and, most importantly, all of the bolt-on congestion mitigation steps are in place.			

Response
Planning for BRAC implementation includes use of critical path methodologies. Without congressional action, the Army is without authority unilaterally to delay implementation beyond September 15, 2011.

Commenter	Comment #	Comment Type	Name
S1	S1.5	Elected Official	Vivian Watts
Section	Page Number	Organization	
4.3 Transportation		Virginia House of Delegates	

Comment			
For every presentation of the stark reality of transportation needs and of what must be accomplished in an impossibly short time frame found one place in the EIS, elsewhere, there is a counter expression. Such overly optimistic counter expressions might be applicable to BRAC relocations elsewhere, but such rationales are simply not a sound basis for decision-making in the 3rd most congested region in the nation, in a state whose transportation is arguably the most underfunded, and in a robust economy of full employment with one of the highest percentages of two-income households in the nation.			

Response
Comment noted. The study team worked with VDOT and Fairfax County to determine an appropriate assumptions of employee distribution.

Commenter	Comment #	Comment Type	Name
S2	S2.1	State Agency	Ellie Irons
Section	Page Number	Organization	
4.8 Biological Resources		Virginia Department of Environmental Quality	

Comment			
(b) Plant and Insect Species. Under a memorandum of agreement with the Department of Agriculture and Consumer Services (VDACS), DCR represents VDACS in commenting on potential impacts of projects upon state-listed endangered and threatened plant and insect species.			
(i) Small Whorled Pogonia. The small whorled pogonia (<i>Isotria medeoloides</i> , G2/S2/LT/LE) has also been recently documented at Fort Belvoir. This plant is classified as threatened by the United States Fish and Wildlife Service (USFWS) and as endangered by the Virginia Department of Agriculture and Consumer Services (VDACS). Due to the protected status of small whorled pogonia, DCR recommends that the plant be avoided in planning for development. DCR also recommends that the Army coordinate with USFWS and the Department of Game and Inland Fisheries (DGIF) to ensure compliance with protected species legislation; see "Regulatory and Coordination Needs," item 3, below).			
(ii) Other Plant Species. According to DCR, Parker's pipewort (<i>Eriocaulon parkeri</i> , G3/S2/NL/NL) and river bulrush (<i>Schoenopletus fluviatilis</i> , G5/S2/NL/NL) have also been documented within Fort Belvoir.			

Response
Fort Belvoir's INRMP established policies and guidelines in accordance with federal law and Army regulation for the protection of federal- and state-listed protected species. The installation will protect such species during BRAC development in accordance with its INRMP.

Commenter	Comment #	Comment Type	Name
S2	S2.2	State Agency	Ellie Irons
Section	Page Number	Organization	
4.8 Biological Resources		Virginia Department of Environmental Quality	
Comment			
(c) Animal Species: Wood Turtle. According to DCR, the wood turtle has been documented at the Po Road Bridge and in Accotink Creek. The wood turtle is classified as threatened by the Virginia Department of Game and Inland Fisheries (DGIF). Due to the protected status of the wood turtle, DCR recommends coordination with DGIF to ensure compliance with protected species legislation (see "Regulatory and Coordination Needs," item 3, below).			
Response			
Fort Belvoir's INRMP established policies and guidelines in accordance with federal law and Army regulation for the protection of federal- and state-listed protected species. The installation will protect such species during BRAC development in accordance with its INRMP.			

Commenter	Comment #	Comment Type	Name
S2	S2.3	State Agency	Ellie Irons
Section	Page Number	Organization	
4.8 Biological Resources		Virginia Department of Environmental Quality	
Comment			
(d) Recommendations. The Department of Conservation and Recreation recommends several measures to mitigate or avoid impacts upon natural heritage resources.			
(i) Avoid Significant Natural Communities. First, DCR recommends avoidance of the significant natural communities listed above (see Technical Report for the U.S. Army Fort Belvoir 96-03, 1996).			
(ii) Avoid Wetlands in the Southwest Training Area. These wetlands, especially the beaver pond, should be avoided. Training activities in these wetlands could cause significant impacts to their hydrology and affect the sphagnum sprite found there. Avoiding wetland impacts will also protect the viability of the rare wetland plants mentioned above (see item 1(b), above).			
(iii) Maintain the Seepage Swamp Habitat.			
(iv) Avoid Training Area T-17. This area should be avoided because of possibly significant impacts to the Northern Virginia well amphipod; the area includes the only known extant population of this species on a global scale.			
(v) Minimize Impacts to Aquatic Ecosystems. To minimize adverse impacts to the aquatic ecosystem as a result of the proposed activities, DCR also recommends the implementation of and strict adherence to erosion and sediment control measures during all land-disturbing activities.			
Response			
Fort Belvoir protects significant natural habitats and natural resources in accordance with its INRMP, which incorporates federal law and Army policy. The installation will take all significant natural features on the installation into account during the planning and construction stages and protect the resources to the extent practicable.			

Commenter	Comment #	Comment Type	Name
S2	S2.4	State Agency	Ellie Irons
Section	Page Number	Organization	
4.2 Land Use		Virginia Department of Environmental Quality	
Comment			
<p>(a) Concerns with regard to the Land Use Plan Update. In connection with the discussions and figures on the proposed Land Use Plan Update, the Department of Game and Inland Fisheries (“DGIF”) notes that areas previously designated for outdoor recreation and as environmentally sensitive are to be given designations such as “Community,” “Airfield,” and “Professional/Institutional” (see Draft EIS, pages 2-2 through 2-7, sections 2.2.1.1 and 2.2.1.2 and Figures 2-1 and 2-2; also page 4-18, section 4.2.2.1). While the Draft EIS states that the newly designated areas could be used for activities not requiring construction and that the environmentally sensitive areas will retain regulatory protection (page 2-7, third bullet paragraph, “Open Space” heading), DGIF is concerned that areas previously designated as open space may be subject to development pressure. The EPG area includes the Accotink drainage, which provides wild habitat that should be protected. DGIF notes that the existing land use plan, retaining sensitive and outdoor space designations, included areas designated for future development; this suggests that the increase of development acreage of approximately 800 acres, in the Preferred Alternative land use plan (see page 4-18, section 4.2.2.1), is not necessary.</p> <p>In addition, DGIF questions whether the change in designation of these areas is consistent with the Integrated Natural Resources Management Plan (INRMP) developed for Fort Belvoir. Under the Sikes Act, there may be a requirement that the state wildlife agency (DGIF) and the U.S. Fish and Wildlife Service be consulted on proposed changes to the Land Use Plan that would alter the designation of areas known to provide habitat for wildlife, particularly threatened and endangered species.</p>			
Response			
<p>The updated land use plan in the FEIS reclassified land use categories from the 1993 Master Plan in accordance with Army Regulation 210-20 and the Army's Master Planning Technical Manual (MPTM). In addition to regulatory protection requirements, environmentally sensitive areas remain protected by mitigations identified in environmental assessments and in the 1991 BRAC ROD. Adoption of an updated land use plan is the first step in that process. Further revision of the post's Real Property Master Plan is underway, and follow-on NEPA documentation would analyze the environmental impacts of that plan. Fort Belvoir will continue coordination with the state through these processes. In addition, the project-siting process on Fort Belvoir evaluates both compliance with land use designations and potential other issues with sites. Areas identified as sensitive (i.e., RPAs, wetlands) still retain their regulatory protections. See the response to Comment L1.4.</p>			

Commenter	Comment #	Comment Type	Name
S2	S2.5	State Agency	Ellie Irons
Section	Page Number	Organization	
4.2 Land Use		Virginia Department of Environmental Quality	
Comment			
<p>The Draft EIS indicates that the Fort supports some ecologically sensitive and unique areas (page 4-257, section 4.8). DGIF recommends that the Army review the INRMP to ensure that activities proposed for Fort Belvoir are consistent with previously agreed-upon management activities for the wildlife and habitat available on the Fort.</p> <p>(b) Recommendations on the Land Use Plan Update. As a general matter, the more open space there is, the more wildlife habitat is available and the greater the protection for the watershed. The designation of areas on the Fort as open space and/or natural resource protection areas may, if protected and situated properly within the landscape, provide corridors for wildlife movement and linkages between habitats. Such areas should, in the judgment of DGIF, include the environmentally sensitive areas, wetlands, and riparian buffers consistent with Resource Protection Areas (RPAs; see “Federal Consistency,” item 4(a), below).</p>			
Response			
<p>Comment noted. The project-siting process on Fort Belvoir evaluates both compliance with land use designations and the INRMP and potential other issues with sites. Areas identified as sensitive (i.e., RPAs, wetlands) still retain their regulatory protections.</p>			

Commenter	Comment #	Comment Type	Name
S2	S2.6	State Agency	Ellie Irons
Section	Page Number	Organization	
4.8 Biological Resources		Virginia Department of Environmental Quality	
Comment			
<p>(c) MWR Family Travel Camp. Each of the alternative plans includes a proposed MWR (“Morale, Welfare, and Recreation;” see Draft EIS, page 2-14, Table 2-3) Family Travel Camp, to be situated near the shoreline in the southwestern part of South Post (project #20; see Draft EIS, Figures 2-6 (page 2-15), 3-2 (page 3-5), 3-4 (page 3-8), and 3-6 (page 3-12). This facility may affect waterfowl hunting zone 2, and/or areas that are hunted for deer and turkey. In addition, it might affect bald eagle nesting and/or concentration areas. Accordingly, DGIF recommends that the Army coordinate with DGIF regarding this site, to allow additional review of its impacts on wildlife and hunting opportunities in the area; see “Regulatory and Coordination Needs,” item 3, below.</p>			
Response			
<p>Comment noted. Thank you for your interest. Your comment will be made part of the administrative record of the action.</p>			

Commenter	Comment #	Comment Type	Name
S2	S2.7	State Agency	Ellie Irons
Section	Page Number	Organization	
4.7 Water Resources		Virginia Department of Environmental Quality	
Comment			
<p>(d) Surface Water Quality Best Management Practices (“BMPs”). The Draft EIS discusses a number of recommended BMPs but does not commit the Army to avoidance of in-line BMPs (pages 4-232 and 4-233, Section 4.7.2.4.1). DGIF supports the use of stormwater management practices and of erosion and sediment controls during construction, but does not support the use of in-line BMPs.</p> <p>(i) Stormwater Controls and BMPs; Low-Impact Development. Stormwater controls should be designed to replicate and maintain the hydrographic condition of the site before the change in landscape. This should include, but not be limited to, use of bio-retention areas and minimizing the use of curb and gutter in favor of grassed swales.</p> <p>Bio-retention areas (also called rain gardens) and grassed swales are components of Low-Impact Development (LID), as the Draft EIS mentions (page 4-233, section 4.7.2.4.1). They are designed to capture stormwater runoff as close to the source as possible and allow it to slowly infiltrate into the surrounding soil. They benefit natural resources by filtering pollutants and decreasing downstream runoff volumes. DGIF encourages the use of LID practices.</p> <p>(ii) Mitigation Measures for In-stream Activities. If in-stream activities must be undertaken, DGIF recommends the following mitigation measures:</p> <ul style="list-style-type: none"> • conduct any in-stream activities during low or no-flow conditions; • use non-erodible cofferdams to isolate the construction area; • block no more than 50% of the streamflow at any given time; • stockpile excavated material in a manner that prevents its re-entry into the stream; • restore the original streambed and streambank contours; • re-vegetate barren areas with native vegetation; and • implement strict erosion and sediment control measures (see item 7, below). <p>(iii) Stream Crossings. Due to future maintenance costs and the loss of riparian and aquatic habitat associated with culverts, DGIF prefers stream crossings to be constructed via clear-span bridges. However, if this is not possible, DGIF recommends countersinking any culverts below the streambed at least 6 inches, or using “bottomless culverts,” to allow passage of aquatic organisms. In addition, floodplain culverts should be installed to carry bankfull discharges.</p>			
Response			
<p>The comment notes specific state environmental requirements that must be considered by the Army throughout the project planning and development process. No change was made to the EIS text, which states that state regulations would be adhered to.</p>			

Commenter	Comment #	Comment Type	Name
S2	S2.8	State Agency	Ellie Irons
Section	Page Number	Organization	
4.8 Biological Resources		Virginia Department of Environmental Quality	
Comment			
<p>(i) Habitat Impacts. As the Draft EIS states (page 4-269, section 4.8.2.1.2), many areas currently vegetated, and therefore providing wildlife habitat, will be converted into developed areas pursuant to the BRAC mandate. Development of these areas will result in lost habitat connectivity and increase the likelihood of invasive vegetation and possibly invasive wildlife species in the area. DGIF recommends preservation of like areas as mitigation for loss of this habitat, and development of an invasive species control and/or management strategy to address the matter.</p> <p>(ii) Animal Species. As the Draft EIS indicates (pages 4-261 through 4-264, section 4.8.1.4), Fort Belvoir habitat supports a number of species of mammals, birds, reptiles, and amphibians. DGIF recommends the maintenance of open space on the Fort for these species. In particular, the provision of stop-over or resting habitat is very important in Northern Virginia. Thus in addition to recommending adherence to the management practices in the Fort Belvoir INRMP (see above, item 2(a)), the Department of Game and Inland Fisheries recommends the following, to the greatest extent practicable:</p> <ul style="list-style-type: none"> • maintaining wooded lots • minimizing impacts upon forests, streams, and wetlands • maintaining riparian buffers. <p>In addition, DGIF recommends continued survey activities throughout the Fort to determine what species exist there, what habitat they are using, and to monitor any changes in these populations as the BRAC activities proceed. DGIF also recommends coordination with its regional wildlife biologists so that wildlife populations can be managed through hunting activities; see "Regulatory and Coordination Needs," item 3, below.</p>			
Response			
Fort Belvoir has very good information on its natural resources and will use that information during implementation of the proposed action to minimize effects on natural resources to the extent practicable. Restoration of or mitigation for vegetation losses will be accomplished in accordance with the INRMP.			

Commenter	Comment #	Comment Type	Name
S2	S2.9	State Agency	Ellie Irons
Section	Page Number	Organization	
4.8 Biological Resources		Virginia Department of Environmental Quality	
Comment			
<p>(f) Anadromous Fish Use Areas: Recommendations.</p> <p>(i) Listing. The following have been designated Anadromous Fish Use Areas:</p> <ul style="list-style-type: none"> • Accotink Creek • Dogue Creek • Pohick Creek • Potomac River. <p>Anadromous fish are particularly sensitive to sedimentation and noise (percussion, vibration). Activities that create such stressors may result in adverse impacts upon anadromous fish species, and upon their ability to migrate through and spawn in these waters.</p> <p>(ii) Recommendations. DGIF recommends coordination by the Army for any projects which might give rise to impacts on these waterways; see "Regulatory and Coordination Needs," item 3, below. Recommendations resulting from this coordination are likely to include time-of-year restrictions or activity restrictions for the protection of these areas. It is important that these waters remain free of impediments and that the water quality be maintained.</p>			
Response			
Fort Belvoir will continue to coordinate with USFWS and DGIF throughout the implementation of the BRAC actions to achieve the minimum practicable effect on its natural resources.			

Commenter	Comment #	Comment Type	Name
S2	S2.10	State Agency	Ellie Irons
Section	Page Number	Organization	
4.8 Biological Resources		Virginia Department of Environmental Quality	
Comment			
<p>(i) Bald Eagles. Bald eagles (listed as threatened by state and federal governments) have nests known to be in the southwest area and the South Post. In addition, much of the Potomac River shoreline, including the shores of Accotink Bay and Pohick Bay, are designated Concentration Zones for this species.</p> <p>According to the Bald Eagle Protection Guidelines for Virginia (available on the Department of Game and Inland Fisheries web site, www.dgif.virginia.gov), any projects within 1,320 feet (0.25 mile) of a bald eagle nest may result in impacts upon the species. Projects located within this zone may be subject to time-of-year restrictions, activity restrictions, or other conservation measures. The concentration zone is also afforded some protection. Moreover, any activity within 750 feet of the shoreline may result in impacts upon the bald eagle, and this area may require the same project limitations as the 1/4 mile boundary above.</p> <p>The proposed Family Travel Camp appears to be proposed for areas that might include bald eagle concentration (foraging) and nesting areas (Draft EIS, page 2-24, section 2.2.2.3; see item 2(c), above); thus this project might affect the species. It is particularly important, therefore, that the Army consult with DGIF regarding this project in particular, as well as consulting with DGIF and the U.S. Fish and Wildlife Service for any projects within 750 feet of the shoreline and, in any case, for projects within 1/4 mile of bald eagle nests. See "Regulatory and Coordination Needs," item 3, below.</p>			
Response			
<p>Fort Belvoir's INRMP established policies and guidelines is in accordance with federal law and Army regulation for the protection of federal- and state-listed protected species. The installation will protect such species during BRAC development in accordance with its INRMP.</p>			

Commenter	Comment #	Comment Type	Name
S2	S2.11	State Agency	Ellie Irons
Section	Page Number	Organization	
4.8 Biological Resources		Virginia Department of Environmental Quality	
Comment			
<p>(ii) Wood Turtles. Wood turtles (listed as threatened by the state government) have been documented on the North Post, Dogue Creek, and an unnamed tributary to Dogue Creek. The Creek and its tributary have been designated as Threatened and Endangered Species Waters due to the presence of the wood turtle. Wood turtles have also been known from the Accotink drainage, although none have been documented from Accotink Creek on Fort Belvoir. Wood turtles use clear brooks and streams during hibernation, but also wander in riparian areas for foraging and nesting during warmer months.</p> <p>For projects likely to affect these waters and/or riparian areas within 600 feet of them, the Army should coordinate with the Department of Game and Inland Fisheries (see "Regulatory and Coordination Needs," item 3, below). DGIF is likely to recommend that the Army, for any such project:</p> <ul style="list-style-type: none"> • Adhere to time-of-year restrictions for certain activities; • Educate contractors regarding the wood turtle; • Undertake survey activities; and/or • Follow other conservation recommendations. <p>In addition, DGIF recommends that the Army maintain at least a 100-foot riparian buffer for all streams and wetlands, and a 600-foot buffer for streams known to support wood turtles.</p>			
Response			
<p>Fort Belvoir's INRMP established policies and guidelines are in accordance with federal law and Army regulation for the protection of federal- and state-listed protected species. The installation will protect such species during BRAC development in accordance with its INRMP.</p>			

Commenter	Comment #	Comment Type	Name
S2	S2.12	State Agency	Ellie Irons
Section	Page Number	Organization	
4.8 Biological Resources		Virginia Department of Environmental Quality	
Comment			
(iii) Peregrine Falcon. The peregrine falcon (listed as threatened by the state government) may occur at Fort Belvoir, as the Draft EIS indicates (page 4-266, section 4.8.1.5.3), but DGIF has not currently documented any nesting sites on the Fort, and does not anticipate any impacts to this species from BRAC developments.			
Response			
Fort Belvoir will protect all listed species in accordance with the law and the policies and guidelines of its INRMP.			

Commenter	Comment #	Comment Type	Name
S2	S2.13	State Agency	Ellie Irons
Section	Page Number	Organization	
4.8 Biological Resources		Virginia Department of Environmental Quality	
Comment			
(iv) Northern Virginia Well Amphipod. The Northern Virginia well amphipod, a federal species of concern (Draft EIS, page 4-266, section 4.8.1.5.5), has been documented on the South Post. Threats to this species include groundwater degradation. The species and its habitat should be considered as BRAC actions proceed.			
Response			
The species is considered in the EIS, and Fort Belvoir will protect all listed species in accordance with the law and the policies and guidelines of its INRMP.			

Commenter	Comment #	Comment Type	Name
S2	S2.14	State Agency	Ellie Irons
Section	Page Number	Organization	
4.8 Biological Resources		Virginia Department of Environmental Quality	
Comment			
(v) Shortnose Sturgeon. The shortnose sturgeon is known in the Potomac River. The recommendations for anadromous fish waters (see item 2(f)(ii), above) also apply for the protection of this species.			
Response			
Fort Belvoir's INRMP established policies and guidelines are in accordance with federal law and Army regulation for the protection of federal- and state-listed protected species. The installation will protect such species during BRAC development in accordance with its INRMP.			

Commenter	Comment #	Comment Type	Name
S2	S2.15	State Agency	Ellie Irons
Section	Page Number	Organization	
4.4 Air Quality		Virginia Department of Environmental Quality	
Comment			
<p>(i) Requirements. The ozone precursor emissions increases from the proposed projects will exceed the general conformity thresholds for the area. For this reason, a determination must be made that the action conforms to the applicable air quality plan and supports the overall goal of air quality standard compliance in the area. Accordingly, project emission increases must be directly offset by equivalent reductions, or otherwise accounted for in the regional air quality planning process. The construction phase of the BRAC projects coincides with a period in which the Washington area must demonstrate compliance with both the 8-hour ozone and the fine particulate matter standards.</p>			
Response			
<p>The draft general conformity determination was prepared and included in the draft EIS and is included in Appendix E of this Final EIS for reference purposes. The Army is continuing to work with the Commonwealth of Virginia to identify mitigation measures required to conform. The concepts being agreed to include using a developable land calculation in apportioning the SIP inventory data, specifying the enforcement inspection and penalty clauses to be used to monitor mitigation measures during construction, including mitigation measures such as limiting construction on ozone action days, meeting new engine standards for non-road equipment, equipment substitutions, diesel retrofitting, anti-idling restrictions, and the use of alternative fuels. Potential mitigation measures are included in the EIS in Section 4.4.2.3. The Army must make public its Clean Air Act conformity determination by placing a notice by prominent advertisement in a daily newspaper of general circulation in the area affected by the action, and will do so once it is completed. Information on these mitigations will be included in the ROD.</p>			

Commenter	Comment #	Comment Type	Name
S2	S2.16	State Agency	Ellie Irons
Section	Page Number	Organization	
4.4 Air Quality		Virginia Department of Environmental Quality	
Comment			
<p>(ii) Shortcomings in the Draft EIS. The Draft EIS offers no proposed mitigation measures to lessen the impact of construction emissions during the critical attainment period mentioned above (item 3(a)(i)). There is also no discussion of toxic air pollutant emissions and impacts; at a minimum, the Final EIS should include an estimate of current and future total hazardous air pollutant emissions, along with an evaluation of regulatory applicability.</p> <p>The Draft EIS and conformity analysis (Appendix E) identifies stationary source equipment and motor vehicles as the only sources of operational emission increases from the projects. There is no mention of anticipated emissions increases in sources such as consumer products, solvent usage, gasoline distribution, landscaping, aircraft operations, and perhaps others. The Final EIS should address all sources of air pollution and protected emissions increases.</p>			
Response			
<p>The draft general conformity determination was prepared and included in the draft EIS and is included in Appendix E of this Final EIS for reference purposes. The Army is continuing to work with the Commonwealth of Virginia to identify mitigation measures required to conform. The concepts being agreed to include using a developable land calculation in apportioning the SIP inventory data, specifying the enforcement inspection and penalty clauses to be used to monitor mitigation measures during construction, including mitigation measures such as limiting construction on ozone action days, meeting new engine standards for non-road equipment, equipment substitutions, diesel retrofitting, anti-idling restrictions, and the use of alternative fuels. Potential mitigation measures are included in the EIS in Section 4.4.2.3. The Army must make available its final conformity determination, and will do so once it is completed. Information on these mitigations will be included in the ROD.</p> <p>Many other sources of air emissions may change in response to the proposed action or alternatives. These may include the emissions cited in the comment. However, because the Army does not know the location of these other emissions they do not meet the definition of reasonably foreseeable or indirect emissions (40 CFR 93.152). Therefore, they were not included in the conformity determination or EIS (40 CFR 93.153(c)(3)). Since the BRAC action at Fort Belvoir does constitute a net decrease in personnel in the region, it is anticipated that these sources of air emissions would decrease as well. The EIS has been updated to qualitatively address HAPs associated with both construction and stationary sources in Sections 4.4.2.2.1 and 4.4.2.2.3 respectively.</p>			

Commenter	Comment #	Comment Type	Name
S2	S2.17	State Agency	Ellie Irons
Section	Page Number	Organization	
4.4 Air Quality		Virginia Department of Environmental Quality	
Comment			
<p>(b) Construction Phase.</p> <p>(i) Impacts. The temporary air pollutant increases from the five-year construction phase are by far the largest in terms of mass emissions, with the largest impact occurring in 2010 (374 tons of oxides of nitrogen (NOx) and 238 tons of volatile organic compounds (VOC)). Lesser, but still significant, levels are predicted for each year during the period from 2007 to 2011. In addition to the coinciding period of demonstrating compliance with the NAAQS, the project area is generally upwind of one of the worst-case ozone monitors in the non-attainment area, located at Mount Vernon. This monitor has an ozone design value of 90 parts per billion, the highest in Northern Virginia.</p> <p>(ii) Conformity. The Army proposes to demonstrate conformity for the construction phase and resulting emissions by comparing them to the current 1-hour and pending 8-hour ozone State Implementation Plan (SIP) regional emission estimates for non-road (NOx) and area (VOC) sources to demonstrate that they are:</p> <ol style="list-style-type: none"> 1) not significant at the regional level, and 2) can be reasonably assumed to be included in the regional estimates for non-road and area sources. <p>While previous EPA actions may have set precedents for using this method, the method has not yet been accepted by EPA Region III for the purpose of demonstrating general conformity for this particular project and situation. The Army should therefore continue to explore all available means to demonstrate conformity for the construction phase in the event the proposed method is not acceptable.</p> <p>(iii) Recommendations. DEQ's Air Quality Division recommends that the Army include, and commit to implement, a construction performance contract plan in the Final EIS. The plan should include all reasonable emission control measures to minimize the impact of the construction activities related to the BRAC projects. The measures to be considered should include, but not be limited to:</p> <ol style="list-style-type: none"> 1. The exclusive use of new diesel engine standard-compliant or control device-retrofitted heavy construction equipment; 2. Strict restriction of equipment idling times; and 3. Restriction or prohibition of construction on days when high ozone levels are predicted in the area. At a minimum, this should be done on predicted "Code Red" ozone days. <p>(iv) Regulatory Requirements for Construction. The construction projects should be accomplished in full compliance with current and pending Virginia requirements, through the use of compliant practices and/or products. See "Regulatory and Coordination Needs," item 1(a), below.</p>			
Response			
<p>The draft general conformity determination was prepared and included in the draft EIS and is included in Appendix E of this Final EIS for reference purposes. The Army is continuing to work with the Commonwealth of Virginia to identify mitigation measures required to conform. The concepts being agreed to include using a developable land calculation in apportioning the SIP inventory data, specifying the enforcement inspection and penalty clauses to be used to monitor mitigation measures during construction, including mitigation measures such as limiting construction on ozone action days, meeting new engine standards for non-road equipment, equipment substitutions, diesel retrofitting, anti-idling restrictions, and the use of alternative fuels. Potential mitigation measures are included in the EIS in Section 4.4.2.3. The Army must make available its final conformity determination, and will do so once it is completed. Information on these mitigations will be included in the ROD.</p>			

Commenter	Comment #	Comment Type	Name
S2	S2.18	State Agency	Ellie Irons
Section	Page Number	Organization	
4.4 Air Quality		Virginia Department of Environmental Quality	
Comment			
<p>(b) Operations Phase. Most air quality impacts from the completed Fort Belvoir projects will be generated from increased local motor vehicle traffic and stationary source equipment operation to support the new facilities on base.</p> <p>(i) Evaluation of Transportation Impacts. To fully evaluate air quality impacts from the Fort Belvoir BRAC projects and other BRAC undertakings in the Washington area, the best and most current employment and traffic projections must be compiled and provided to the Metropolitan Washington Council of Governments' Transportation Planning Board ("TPB"). These projections are then incorporated into the next regional transportation conformity determination for the Washington, D.C. non-attainment area. In this way, the overall transportation impact of the BRAC projects can be determined and demonstrated to conform to the SIP.</p> <p>(ii) Mitigation of Transportation Effects. DEQ's Air Quality Division recommends that all reasonable congestion mitigation practices should be employed to reduce transportation impacts on air quality; these should include ozone action days, codes orange and red telecommuting, and public transportation.</p> <p>(iii) Evaluation of Stationary Source Impacts. Stationary source equipment to support the new facilities contemplated under BRAC will be subject to different regulatory requirements, depending on the final project configuration. Requirements in the Virginia Regulations for the Control and Abatement of Air Pollution for major new source review for non-attainment areas (Article 9, 9 VAC 5-80-2000 et seq.) or minor new source review (Article 6, 9 VAC 5-80-1100 et seq.) will apply. The current estimate of the preferred alternative predicts that emissions will be below the major source threshold; therefore, minor new source review would apply. However, DEQ would still be required to find that the emissions increases are accounted for in the applicable SIP. See "Regulatory and Coordination Needs," item 1, below.</p> <p>(iv) Mitigation of Stationary Source Effects. According to DEQ's Air Quality Division, the Army should consider control devices and/or strategies to further reduce the emissions from stationary source equipment, even if such devices would not be required by the applicable permitting process.</p>			
Response			
<p>The draft general conformity determination was prepared and included in the draft EIS and is included in Appendix E of this Final EIS for reference purposes. The Army is continuing to work with the Commonwealth of Virginia to identify mitigation measures required to conform. The concepts being agreed to include using a developable land calculation in apportioning the SIP inventory data, specifying the enforcement inspection and penalty clauses to be used to monitor mitigation measures during construction, including mitigation measures such as limiting construction on ozone action days, meeting new engine standards for non-road equipment, equipment substitutions, diesel retrofitting, anti-idling restrictions, and the use of alternative fuels. Potential mitigation measures are included in the EIS in Section 4.4.2.3. The Army must make available its final conformity determination, and will do so once it is completed. Information on these mitigations will be included in the ROD.</p> <p>The Transportation Conformity Rules are applicable to highways and mass transit projects within non-attainment areas and establish the criteria and procedures for determining that transportation plans, programs, and projects that are funded under Title 23 of the U.S.C., or the Federal Transit Act, conform to SIPs. Because the proposed action and alternatives are not transportation projects and not adopted, accepted, approved, or funded by the FHWA or FTA, the Transportation Conformity Rules do not apply. However, the U.S. Army will continue to coordinate with VDEQ and MWCOG to ensure the latest planning assumptions associated with the BRAC within the region are available. On-road mobile source mitigation measures that will be funded and implemented have been included in the FEIS.</p> <p>Stationary source emissions have been estimated and are included in the FEIS. They are consistent with the comment.</p> <p>A review of stationary source reductions has been included in the FEIS. These include federally enforceable limits on generator usage. Stationary source mitigation measures that will be funded and implemented have also been included in the FEIS.</p>			

Commenter	Comment #	Comment Type	Name
S2	S2.19	State Agency	Ellie Irons
Section	Page Number	Organization	
4.12 Utilities		Virginia Department of Environmental Quality	
Comment			
<p>(e) Demolition or Renovation of Structures. Structures to be demolished, renovated, or removed should be checked for asbestos-containing materials and for lead-based paint prior to demolition. Appropriate measures must be taken if either or both substances are found; see "Regulatory and Coordination Needs," item 6(d), below.</p> <p>(f) Child Care Facility Construction. The Army proposes to build two new child-care facilities on the EPG (Child Development Centers #55661 and 55662) (Draft EIS, page 2-21, section 2.2.2.3). The risk assessments to be performed for this area, especially for child-care facilities, should include the appropriate risk pathways and assumptions used for child-care facilities, according to DEQ's Northern Virginia Regional Office.</p> <p>(g) Pollution Prevention. DEQ encourages the Army to implement pollution prevention principles in all construction projects and facilities. These principles include reduction of waste materials at the source, re-use of materials, and recycling of solid wastes. Hazardous waste generation should also be minimized, and hazardous wastes handled appropriately under state and federal law. See also item 14, below.</p> <p>DEQ's Northern Virginia Regional Office notes that approximately 8,410 tons of construction and demolition (C&D) debris will be generated from the proposed action and disposed of at various landfills in the area (Draft EIS, page 4-458, section 4.15). To reduce the impact of this large quantity of C&D waste, the Army should promote the beneficial re-use or recycling of it by sending it to a material recovery facility instead of to landfills.</p>			
Response			
<p>Comment noted. Thank you for your interest. Matters contained in the comment are addressed in appropriate sections of the EIS.</p>			

Commenter	Comment #	Comment Type	Name
S2	S2.20	State Agency	Ellie Irons
Section	Page Number	Organization	
4.7 Water Resources		Virginia Department of Environmental Quality	
Comment			
<p>(c) General Impacts. The primary impacts on water resources from these projects will be caused by increases in impermeable surfaces, changes to stormwater hydrographs, erosion and sedimentation increases during construction, and increases in non-point source runoff after construction. DEQ's Division of Water Resources does not have a preference among the alternatives described in the Draft EIS.</p> <p>(d) Wetlands Protection and Mitigation. In general, DEQ recommends that the section 404(b)(1) guidelines be followed, and that stream and wetland impacts be avoided to the maximum extent practicable. To minimize unavoidable impacts to wetlands and waterways, DEQ recommends the following practices:</p> <ul style="list-style-type: none"> • Operate machinery and construction vehicles outside of stream-beds and wetlands; use synthetic mats when in-stream work is unavoidable; • Erosion and sedimentation controls should be designed in accordance with the most current edition of the Virginia Erosion and Sediment Control Handbook (see "Regulatory and Coordination Needs," item 4, below). These controls should be in place prior to clearing and grading, and maintained in good working order to minimize impacts to State waters. The controls should remain in place until the area is stabilized. • Place heavy equipment, located in temporarily impacted wetland areas, on mats, geotextile fabric, or use other suitable measures to minimize soil disturbance, to the maximum extent practicable. • Restore all temporarily disturbed wetland areas to pre-construction conditions and plant or seed with appropriate wetlands vegetation in accordance with the cover type (emergent, scrub-shrub, or forested). The Army should take all appropriate measures to promote re-vegetation of these areas. Stabilization and restoration efforts should occur immediately after the temporary disturbance of each wetland area instead of waiting until the entire project has been completed. • Place all materials which are temporarily stockpiled in wetlands, designated for use for the immediate stabilization of wetlands, on mats, geotextile fabric in order to prevent its entry into State waters. These materials should be managed in a manner that prevents leachates from entering state waters and must be entirely removed within thirty days following completion of the construction activity. The disturbed areas should be returned to their original contours, stabilized within thirty days following removal of the stockpile, and restored to the original vegetated state. • All non-impacted surface waters within the project or right-of-way limits that are within 50 feet of any clearing, grading, or filling activities should be clearly flagged or marked for the life of the construction activity within that area. The Army should notify all contractors that these marked areas are surface waters where no activities are to occur. • Measures should be employed to prevent spills of fuels or lubricants into state waters. 			

Response
The comment identifies specific state environmental requirements that must be considered by the Army throughout the project planning and development process. The EIS states that state regulations would be adhered to.

Commenter	Comment #	Comment Type	Name
S2	S2.21	State Agency	Ellie Irons
Section	Page Number	Organization	
4.9 Cultural Resources		Virginia Department of Environmental Quality	
Comment			
<p>(b) Historic Properties identified in the Draft EIS. The Draft EIS lists the following properties that may be adversely affected by the BRAC projects:</p> <ul style="list-style-type: none"> • Fort Belvoir Historic District; • Friends' Meeting House and Burial Ground; • One eligible archaeological site; and • One potentially eligible archaeological site. <p>The Department of Historic Resources (DHR) believes that the BRAC actions have the potential to adversely affect more historic properties than just these. In some cases, the impacts that BRAC and related activities would have cannot be anticipated at this time, because implementation plans for the BRAC projects are not fully known. As an example, the Department of Historic Resources understands that the Army is not certain which buildings within the Fort Belvoir Historic District will house specific tenant agencies. In the absence of that knowledge, it is impossible to assess the impacts of possible alterations of the buildings, to address the missions of new tenants, upon contributing buildings within the Historic District.</p>			

Response
Renovation projects are listed in Section 2.2 of the EIS. The Army will ensure appropriate consultation in the event it is found that some tenants moving into historic buildings require renovations to the facilities.

Commenter	Comment #	Comment Type	Name
S2	S2.22	State Agency	Ellie Irons
Section	Page Number	Organization	
4.3 Transportation		Virginia Department of Environmental Quality	
Comment			
<p>(c) NEPA and Impact Analysis. The National Environmental Policy Act (NEPA) requires federal agencies to identify and evaluate the full range of impacts that their actions may have on the environment. DHR indicates that the rapid influx of approximately 22,000 additional personnel at the Fort will place additional strain on an already overburdened transportation infrastructure in Fairfax County (see item 13, below, and the separate comments from Fairfax County). The need for new and affordable housing attributable to the Fort's expansion is likely to require zoning changes, new construction, installation of utilities, and associated development; all of this is likely to affect historic properties beyond the boundaries of Fort Belvoir. Accordingly, the EIS must consider not only the direct consequences of BRAC activities, but also secondary outcomes that might affect cultural resources. These indirect and secondary effects might include:</p> <ul style="list-style-type: none"> • auditory and visual impacts from increased automobile traffic; • new development in communities serving Fort Belvoir; • diminished access to heritage destinations; and • new road construction needed to support the increase in Fort population. 			
Response			
The Study Team worked with VDOT and Fairfax County to determine appropriate modeling assumptions and methodologies. It was agreed that the land use would not be modified from what was in the official Metropolitan Planning Organization (MPO) land use plan for the region.			

Commenter	Comment #	Comment Type	Name
S2	S2.23	State Agency	Ellie Irons
Section	Page Number	Organization	
4.3 Transportation		Virginia Department of Environmental Quality	
Comment			
<p>(d) Transportation Impacts. DHR states that, as described in the Draft EIS, transportation analysis and design study will continue throughout the planning phase of the BRAC actions, and more details are likely to emerge as the planning process matures. For the purpose of gathering information for the Draft EIS, the Army used the regional travel demand model maintained by the Metropolitan Washington Council of Governments to estimate traffic impacts. While this method may be expedient for the purposes of the Draft EIS, DHR believes that the implications of BRAC on the transportation infrastructure are likely to be greater than first anticipated. Negative effects to historic properties from increased traffic, such as new road construction, will need to be addressed in the Final EIS and mitigated for in the Section 106 process. See also item 13, below, and the separate comments from Fairfax County.</p>			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.			

Commenter	Comment #	Comment Type	Name
S2	S2.24	State Agency	Ellie Irons
Section	Page Number	Organization	
4.9 Cultural Resources		Virginia Department of Environmental Quality	
Comment			
<p>(e) Archaeological Resources. The Department of Historic Resources indicates that additional archaeological evaluation (Phase II investigation) may be necessary to determine the National Register eligibility of sites currently considered potentially eligible (see Draft EIS, page 4-303, section 4.9.2.3.2). The Department understands that Phase II evaluation of Site 44FX1933 has been completed; the Army is requested to submit two copies of the evaluation report (see "Regulatory and Coordination Needs," item 7, below).</p> <p>The Department of Historic Resources is also interested in the status of the recommendation for archaeological potential, or lack thereof, for the GSA Parcel (see Draft EIS, page 4-289, section 4.9.1.3.1 and page 4-308, section 4.9.4.1.1). See "Regulatory and Coordination Needs," item 7, below.</p>			
Response			
Comment noted. The Army will continue to work with appropriate entities with respect to carrying out its Section 106 process.			

Commenter	Comment #	Comment Type	Name
S2	S2.25	State Agency	Ellie Irons
Section	Page Number	Organization	
4.6 Geology/Soils		Virginia Department of Environmental Quality	
Comment			
<p>7. Erosion and Sediment Control; Stormwater Management. Federal agencies and their authorized agents conducting regulated land-disturbing activities on private and public lands in the state must comply with the Virginia Erosion and Sediment Control Law and its implementing regulations, the Virginia Stormwater Management Law and its implementing regulations, and other applicable federal non-point source pollution mandates (e.g., section 313 of the Clean Water Act, and Federal Consistency requirements (see "Federal Consistency..." below) under the Coastal Zone Management Act). The sponsoring federal agency, in this case the Army, is ultimately responsible for achieving project compliance through oversight of on-site contractors, regular field inspection, prompt action against non-compliant sites, and/or other mechanisms consistent with agency policy. See "Regulatory and Coordination Needs," item 4, below.</p> <p>(a) Erosion and Sediment Control. Erosion and Sediment Control requirements apply to land-disturbing activities that affect 2,500 square feet or more (in Chesapeake Bay Preservation Areas such as the project area; see "Federal Consistency..." item 4, below). Accordingly, the Army should prepare and implement Erosion and Sediment Control Plans for this project to ensure compliance with state law. See "Regulatory and Coordination Needs," item 4, below. The Erosion and Sediment Control requirement is an Enforceable Policy of the Virginia Coastal Resources Management Program; see "Federal Consistency..." item 5, below.</p>			
Response			
Erosion and sediment control within the context of the Virginia Storm Water Management Program are discussed in Section 4.7.1.3.1. As noted in Section 4.14.4, the Army will prepare and implement an erosion and sediment control plan before beginning any construction associated with BRAC facilities.			

Commenter	Comment #	Comment Type	Name
S2	S2.26	State Agency	Ellie Irons
Section	Page Number	Organization	
4.7 Water Resources		Virginia Department of Environmental Quality	
Comment			
<p>(b) Stormwater Management. Stormwater Management requirements apply to land-disturbing activities that affect a land area of one (1) acre or more. As with the Erosion and Sediment Control Plan, the Army should prepare and implement a Stormwater Management Plan for the project to ensure compliance with state law. The Virginia Stormwater Management Handbook published by the Department of Conservation and Recreation should be consulted for specific designs and standards. See "Regulatory and Coordination Needs," item 4, below.</p> <p>(c) VPDES Stormwater Management General Permit. Development projects which disturb a land area of one acre or more, or projects disturbing between 2,500 square feet and less than 1 acre in Chesapeake Bay Preservation Areas (see "Federal Consistency..." item 4, below) require coverage under the Virginia Pollutant Discharge Elimination System (VPDES) Stormwater General Permit for Construction Activities. See "Regulatory and Coordination Needs," item 5, below.</p>			
Response			
The comment identifies specific state environmental requirements that must be considered by the Army throughout the project planning and development process. The EIS states that state regulations would be adhered to.			

Commenter	Comment #	Comment Type	Name
S2	S2.27	State Agency	Ellie Irons
Section	Page Number	Organization	
4.10 Socioeconomics		Virginia Department of Environmental Quality	
Comment			
<p>8. Outdoor Recreation. According to the Department of Conservation and Recreation, the responsibilities of Fairfax County in regard to recreational resources do not extend to federal government facilities. For this reason, the Army must provide recreational facilities to meet the needs of personnel assigned to Fort Belvoir. The Department of Conservation and Recreation supports full development and the upgrades to the MWR Family Travel Camp (Draft EIS, page 2-24).</p> <p>(a) Comments on Draft EIS. The Draft EIS mentions trail systems and open spaces, but does not mention gyms, pools, activity centers, and ball fields. These features contribute to the quality of life in all communities, according to DCR. The Final EIS should include a recreation section outlining all indoor and outdoor recreation needs (see Draft EIS, pages 1-7 and 1-8, section 1.4.3).</p> <p>(b) Recommendations. The Department of Conservation and Recreation has the following recommendations in regard to recreation facilities and plans:</p> <ul style="list-style-type: none"> • The Final EIS should reflect a plan for how the realigned Fort would provide for recreational needs of 22,000 additional personnel and their families. • Evaluate the on-base alternatives to vehicular travel by assessing trails for walking and bicycling. • Evaluate potential passive recreation trails in the environmental corridors discussed in the Draft EIS (see, for example, page 4-11, section 4.2.1.4.1). • Add gyms, pools, activity centers, and ball fields into the design of the newly realigned Fort. • Develop a plan for alternative transportation (walking and bicycling) to connect all developed portions of the Fort. 			
Response			
<p>Recreation was addressed in the EIS in Section 4.10.2.2.2 subsection "Shops, Services, Recreation" and in Section 5.10 Cumulative Effects. Information on other recreation issues raised in the comment were not considered part of the BRAC action because they did not meet at least one of the following 3 criteria: not funded by BRAC funds; would not be constructed by the 2011 BRAC implementation deadline; or were not ripe enough for NEPA analysis. Other non-BRAC recreation facilities will be identified in Fort Belvoir's upcoming Master Plan Update and associated NEPA documentation.</p>			

Commenter	Comment #	Comment Type	Name
S2	S2.28	State Agency	Ellie Irons
Section	Page Number	Organization	
4.7 Water Resources		Virginia Department of Environmental Quality	
Comment			
<p>9. Water Supply and Wastewater. All potable water is purchased from the Fairfax County Water Authority, according to the Department of Health. Expanded utilities must comply with the Waterworks Regulations (12 VAC 5-590-10 et seq.) and the Sewage Collection and Treatment Regulations (9 VAC 25-790). See "Regulatory and Coordination Needs," item 10, below for contact information.</p>			
Response			
<p>The comment identifies specific state environmental requirements that must be considered by the Army throughout the project planning and development process. The EIS states that state regulations would be adhered to.</p>			

Commenter	Comment #	Comment Type	Name
S2	S2.29	State Agency	Ellie Irons
Section	Page Number	Organization	
4.8 Biological Resources		Virginia Department of Environmental Quality	
Comment			
<p>10. Forest and Tree Protection. The Department of Forestry states that it finds limited impact from this project to the forest resources of the Commonwealth.</p> <p>In order to protect trees in the project area that are not slated for removal from the effects of construction activities associated with this project, the proponent should mark and fence them at least to the dripline or the end of the root system, whichever extends farther from the tree stem. Marking should be done with highly visible ribbon so that equipment operators see the protected areas easily.</p> <p>Parking and stacking of heavy equipment and construction materials near trees can damage root systems by compacting the soil. Soil compaction, from weight or vibration, affects root growth, water and nutrient uptake, and gas exchange. The protection measures suggested above should be used for parking and stacking as well as for moving of equipment and materials. If parking and stacking are unavoidable, the Army should use temporary crossing bridges or mats to minimize soil compaction and mechanical injury to plants.</p> <p>Any stockpiling of soil should take place away from trees. Piling soil at a tree stem can kill the root system of the tree. Soil stockpiles should be covered, as well, to prevent soil erosion and fugitive dust.</p> <p>Questions on tree protection may be directed to the Department of Forestry (Todd Groh, telephone (434) 977-1375, extension 3344).</p>			
Response			
<p>Many of the suggestions here are modern forestry BMPs. Fort Belvoir will protect trees and forests of the installation in accordance with its INRMP policies, Army regulations, and state guidelines to the extent practicable.</p>			

Commenter	Comment #	Comment Type	Name
S2	S2.30	State Agency	Ellie Irons
Section	Page Number	Organization	
4.6 Geology/Soils		Virginia Department of Environmental Quality	
Comment			
<p>11. Mineral Resources. According to the Department of Mines, Minerals, and Energy, the BRAC projects at Fort Belvoir will not affect mineral resources.</p>			
Response			
<p>Thank you for your concurrence.</p>			

Commenter	Comment #	Comment Type	Name
S2	S2.31	State Agency	Ellie Irons
Section	Page Number	Organization	
4.8 Biological Resources		Virginia Department of Environmental Quality	
Comment			
<p>12. Natural Area Preserves. The Department of Conservation and Recreation indicates that there are no state Natural Area Preserves in the vicinity of the projects.</p>			
Response			
<p>Thank you for this determination.</p>			

Commenter	Comment #	Comment Type	Name
S2	S2.32	State Agency	Ellie Irons
Section	Page Number	Organization	
4.3 Transportation		Virginia Department of Environmental Quality	
Comment			
<p>13. Roads and Transportation. According to the Virginia Department of Transportation (VDOT), the travel forecasting methodology used by the Army's consultant was coordinated with VDOT staff. Given the limited amount of detailed data available, the assumptions are reasonable, in the judgment of VDOT. The Final EIS could address the impact of security checks on queuing, and proposed mitigation measures, in greater detail to provide assurance that such required checks will not adversely affect mainline traffic.</p> <p>In its detailed comments on the Draft EIS (enclosed with VDOT letter), VDOT expresses several concerns regarding the impact of increased vehicle traffic upon roads and the traffic situation in the area. The situation appears to warrant careful consideration by the Army in the Final EIS and in its planning for the BRAC developments. Several specific concerns appear, in VDOT's judgment:</p> <ul style="list-style-type: none"> • The impact on traffic caused by consultants and other people doing business with Fort Belvoir agencies (Draft EIS, page 4-79); • The impact of security checks on vehicles entering Fort Belvoir on the traffic of surrounding roads during rush hours (Draft EIS, page 4-83, first paragraph); • The "rideshare facility" needs more description, including location, nature, means of access, security procedures, and whether there will be a bus terminal or transfer station with it (Draft EIS, page 4-85, section 4.3.44); • Greatly expanded transit service should be considered as a mitigation option, according to VDOT, and it might include shuttle service to the Franconia-Springfield station which now serves Metro and Virginia Rail Express trains (Draft EIS, page 4-88). 			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.			

Commenter	Comment #	Comment Type	Name
S2	S2.33	State Agency	Ellie Irons
Section	Page Number	Organization	
4.12 Utilities		Virginia Department of Environmental Quality	
Comment			
<ul style="list-style-type: none"> • Consider development of an Environmental Management System (EMS). An effective EMS will ensure that the proposed facility is committed to minimizing its environmental impacts, setting environmental goals, and achieving improvements in its environmental performance. DEQ offers EMS development assistance and recognizes facilities with effective Environmental Management Systems through its Virginia Environmental Excellence Program. • Consider environmental attributes when purchasing materials. For example, the extent of recycled material content, toxicity level, and amount of packaging should be considered and can be specified in purchasing contracts. • Consider contractors' commitments to the environment (such as an EMS) when choosing contractors. Specifications regarding raw materials and construction practices can be included in contract documents and requests for proposals. • Choose sustainable materials and practices for infrastructure construction and design. These could include asphalt and concrete containing recycled materials, and integrated pest management in landscaping, among other things. • Integrate pollution prevention techniques into facility maintenance and operation, to include the following: inventory control (record-keeping and centralized storage for hazardous materials), product substitution (use of non-toxic cleaners), and source reduction (fixing leaks, energy-efficient HVAC and equipment). Maintenance facilities should be designed with sufficient and suitable space to allow for effective inventory control and preventive maintenance. <p>DEQ's Office of Pollution Prevention provides information and technical assistance relating to pollution prevention techniques and EMS. If interested, the Army may contact that Office (Tom Griffin, telephone (804) 698-4545).</p>			
Response			
The Army continues to refine its practices to attain objectives of sustainability. Many of the factors such as those contained in the comment are regularly considered by the Army. Fort Belvoir is in the process of developing its EMS.			

Commenter	Comment #	Comment Type	Name
S2	S2.34	State Agency	Ellie Irons
Section	Page Number	Organization	
Other		Virginia Department of Environmental Quality	

Comment

Based on the information submitted in the Draft EIS (which contains the consistency determination in Appendix C) and the comments of agencies administering the enforceable policies of the Virginia Coastal Resources Management Program (VCP), the Commonwealth of Virginia objects to the federal consistency determination for the proposed BRAC projects at this time. Pursuant to the Federal Consistency Regulations, 15 CFR Part 930, section 930.43(b), this objection is based on insufficient information needed to determine the consistency of the projects with the Air Pollution Control enforceable policy of the VCP.

Response

Objection noted. The draft air quality general conformity determination was prepared and included in the draft EIS and is included in Appendix E of this Final EIS for reference purposes. The Army is continuing to work with the Commonwealth of Virginia to identify mitigation measures required to conform. The concepts being agreed to include using a developable land calculation in apportioning the SIP inventory data, specifying the enforcement inspection and penalty clauses to be used to monitor mitigation measures during construction, including mitigation measures such as limiting construction on ozone action days, meeting new engine standards for non-road equipment, equipment substitutions, diesel retrofitting, anti-idling restrictions, and the use of alternative fuels. Potential mitigation measures are included in the EIS in Section 4.4.2.3. The Army must make public its Clean Air Act conformity determination by placing a notice by prominent advertisement in a daily newspaper of general circulation in the area affected by the action, and will do so once it is completed. Information on these mitigations will be included in the ROD. Appendix C of the FEIS contains the CZMA consistency determination, which notes the objection on the determination in the Draft EIS and states that the determination is contingent on the GCD and mitigation issues being resolved between the Army and the Commonwealth.

Commenter	Comment #	Comment Type	Name
S2	S2.35	State Agency	Ellie Irons
Section	Page Number	Organization	
4.4 Air Quality		Virginia Department of Environmental Quality	

Comment

Air Pollution Control: General Conformity. As DEQ's Air Quality Division has indicated (see "Environmental Impacts and Mitigation," item 3(a)(i) above), a general conformity analysis is required for the BRAC projects at Fort Belvoir because the Washington Metropolitan Area, of which Fort Belvoir is a part, is a non-attainment area for two criteria pollutants: the 8-hour ozone standard and the fine particulate standard of the National Ambient Air Quality Standards (NAAQS) (see section 176(c) of the federal Clean Air Act). Analysis by the Air Quality Division indicates that the emission of ozone precursors attributable to the BRAC projects will exceed the general conformity thresholds for the area. For this reason, a determination must be made that the proposed action conforms to the applicable air quality plan and supports the overall goal of air quality standard compliance in the area. To achieve this, the project emission increases must be directly offset by equivalent reductions, or otherwise accounted for in the regional air quality planning process.

Response

The draft general conformity determination was prepared and included in the draft EIS and is included in Appendix E of this Final EIS for reference purposes. The Army is continuing to work with the Commonwealth of Virginia to identify mitigation measures required to conform. The concepts being agreed to include using a developable land calculation in apportioning the SIP inventory data, specifying the enforcement inspection and penalty clauses to be used to monitor mitigation measures during construction, including mitigation measures such as limiting construction on ozone action days, meeting new engine standards for non-road equipment, equipment substitutions, diesel retrofitting, anti-idling restrictions, and the use of alternative fuels. Potential mitigation measures are included in the EIS in Section 4.4.2.3. The Army must make available its final conformity determination, and will do so once it is completed. Information on these mitigations will be included in the ROD.

Commenter	Comment #	Comment Type	Name
S2	S2.36	State Agency	Ellie Irons
Section	Page Number	Organization	
4.4 Air Quality		Virginia Department of Environmental Quality	
Comment			
<p>(a) Construction Phase Emissions. As indicated above (“Environmental Impacts and Mitigation,” item 3(a)(i), above), the construction phase of the BRAC undertaking coincides with a time period in which the Washington area must demonstrate compliance with both the 8-hour ozone and the fine particulate matter NAAQS. However, the Draft EIS offers no proposed mitigation measures to lessen the impact of construction emissions during the critical attainment period. Moreover, the Army’s proposed method of demonstrating conformity for the construction phase of the projects has not yet been accepted by EPA Region III for the purpose of demonstrating conformity for this particular project and situation.</p> <p>DEQ’s Division of Air Quality believes that the Army should include, and commit to implement, a construction performance contract plan in the Final EIS. That plan should include all reasonable emission control measures to minimize the impacts of construction activities related to the project. The measures to be considered should include, but not be limited to:</p> <ul style="list-style-type: none"> • The exclusive use of new diesel engine standard-compliant or control device-retrofitted heavy construction equipment; • Strict restriction of equipment idling times; and • Restriction or prohibition of construction on days when high ozone levels are predicted in the area. At a minimum, this should be done on predicted “Code Red” ozone days. 			
Response			
<p>The draft general conformity determination was prepared and included in the draft EIS and is included in Appendix E of this Final EIS for reference purposes. The Army is continuing to work with the Commonwealth of Virginia to identify mitigation measures required to conform. The concepts being agreed to include using a developable land calculation in apportioning the SIP inventory data, specifying the enforcement inspection and penalty clauses to be used to monitor mitigation measures during construction, including mitigation measures such as limiting construction on ozone action days, meeting new engine standards for non-road equipment, equipment substitutions, diesel retrofitting, anti-idling restrictions, and the use of alternative fuels. Potential mitigation measures are included in the EIS in Section 4.4.2.3. The Army must make available its final conformity determination, and will do so once it is completed. Information on these mitigations will be included in the ROD.</p>			

Commenter	Comment #	Comment Type	Name
S2	S2.37	State Agency	Ellie Irons
Section	Page Number	Organization	
4.4 Air Quality		Virginia Department of Environmental Quality	
Comment			
<p>(b) Operational Phase Emissions. To fully evaluate air quality impacts from the Fort Belvoir BRAC projects and other BRAC undertakings in the Washington area, the best and most current employment and traffic projections must be compiled and provided to the Metropolitan Washington Council of Governments’ Transportation Planning Board. These projections are then incorporated into the next regional transportation conformity determination for the Washington, D.C. non-attainment area. In this way, the overall transportation impact of the BRAC projects can be determined and demonstrated to conform to the State Implementation Plan (SIP).</p>			
Response			
<p>The Army has confirmed with MWCOG that the latest planning assumptions associated with the Belvoir BRAC action will be included in the Round 7.1 cooperative forecast for the region.</p>			

Commenter	Comment #	Comment Type	Name
S2	S2.38	State Agency	Ellie Irons
Section	Page Number	Organization	
4.4 Air Quality		Virginia Department of Environmental Quality	
Comment			
<p>(c) Applicable Enforceable Policies. The Air Pollution Control enforceable policy of the Virginia Coastal Resources Management Program includes the requirements of the federal Clean Air Act, including section 176(a), cited above.</p> <p>(d) Summary of Needed Information. As indicated above, we require the following information to allow a determination of the consistency of the proposed BRAC projects with the Air Pollution Control enforceable policy:</p> <ul style="list-style-type: none"> o A construction contract performance plan, including measures to minimize air pollutant emissions (see item (a), above); and o The Army's part of a compilation of traffic and employment projections for incorporation into a conformity determination (see item (b), above). <p>The Army may provide the information directly to DEQ's Air Division or include it in the Final EIS. In this regard, Fort Belvoir staff and DEQ's Air Quality Division have begun direct discussions, which will continue with a meeting on May 1, 2007. Upon receipt of the requested information, the Air Division will complete its analysis of the federal consistency determination. If the information is provided in the Final EIS, DEQ's office of Environmental Impact Review will conduct the review of the FEIS and the consistency determination concurrently.</p> <p>If you need clarification about the information requested, please contact DEQ's Air Quality Division (Jim Sydnor, telephone (804) 698-4424 or Tom Ballou, telephone (804) 698-4406). For clarification on the federal consistency requirement and review process, please contact me (telephone (804) 698-4325) or Charlie Ellis of this Office (telephone (804) 698-4488).</p> <p>(e) Notification Requirement. In accordance with the Federal Consistency Regulations, 15 CFR Part 930, section 930.43(e), the Army must notify DEQ if it decides to proceed, despite our objection, before the project commences.</p>			

Response
<p>The draft general conformity determination was prepared and included in the draft EIS and is included in Appendix E of this Final EIS for reference purposes. The Army is continuing to work with the Commonwealth of Virginia to identify mitigation measures required to conform. The concepts being agreed to include using a developable land calculation in apportioning the SIP inventory data, specifying the enforcement inspection and penalty clauses to be used to monitor mitigation measures during construction, including mitigation measures such as limiting construction on ozone action days, meeting new engine standards for non-road equipment, equipment substitutions, diesel retrofitting, anti-idling restrictions, and the use of alternative fuels. Potential mitigation measures are included in the EIS in Section 4.4.2.3. The Army must make available its final conformity determination, and will do so once it is completed. Information on these mitigations will be included in the ROD.</p> <p>The Army has developed and delivered to VDEQ a construction contract performance plan, including measures to minimize air pollutant emissions (see item (a) in Comment S2.36 above). In addition, the Army has confirmed with MWCOG that the latest planning assumptions associated with the Belvoir BRAC action will be included in the Round 7.1 cooperative forecast for the region.</p>

Commenter	Comment #	Comment Type	Name
S2	S2.39	State Agency	Ellie Irons
Section	Page Number	Organization	
4.8 Biological Resources		Virginia Department of Environmental Quality	
Comment			
<p>1. Fisheries Management. According to the Department of Game and Inland Fisheries, the proposed BRAC projects at Fort Belvoir are consistent with the Fisheries Management enforceable policy of the Virginia Coastal Resources Management Program.</p>			
Response			
Thank you for this determination.			

Commenter	Comment #	Comment Type	Name
S2	S2.40	State Agency	Ellie Irons
Section	Page Number	Organization	
4.8 Biological Resources		Virginia Department of Environmental Quality	
Comment			
2. Wetlands Management. As indicated above (see "Environmental Impacts and Mitigation," item 5(b)), a Virginia Water Protection Permit will be required for projects affecting wetlands and/or surface waters. In order for the projects to be consistent with the Wetlands Management enforceable policy of the Virginia Coastal Resources Management Program, the Army must obtain and comply with the Virginia Water Protection Permits needed for the projects. See "Regulatory and Coordination Needs," item 2, below.			
Response			
Fort Belvoir will obtain all necessary permits for any disturbance of wetlands and will require adherence to all permit conditions.			

Commenter	Comment #	Comment Type	Name
S2	S2.41	State Agency	Ellie Irons
Section	Page Number	Organization	
4.7 Water Resources		Virginia Department of Environmental Quality	
Comment			
3. Subaqueous Lands Management. The Marine Resources Commission has jurisdiction over any encroachments in, on, or over any state-owned rivers, creeks, or streams in the Commonwealth. If any of the project activities should involve any encroachment channelward of ordinary high water along natural rivers and streams, a permit may be required from the Commission. In that case, the project or projects in question would be consistent with the Subaqueous Lands Management enforceable policy of the Virginia Coastal Resources Management Program if the Army applies for, obtains, and complies with the permit. See "Regulatory and Coordination Needs," item 9, below.			
Response			
The comment identifies specific state environmental requirements that must be considered by the Army throughout the project planning and development process. The EIS states that state regulations would be adhered to.			

Commenter	Comment #	Comment Type	Name
S2	S2.42	State Agency	Ellie Irons
Section	Page Number	Organization	
4.8 Biological Resources		Virginia Department of Environmental Quality	
Comment			
<p>(ii) Requirements. RPAs and RMAs are subject to general performance criteria found in the Chesapeake Bay Preservation Area Designation and Management Regulations (9 VAC 10-20-10 et seq.; see 9 VAC 10-20-120). These include the following requirements:</p> <ul style="list-style-type: none"> • minimize land disturbance; • preserve indigenous vegetation; • minimize post-development impervious surfaces; • satisfy stormwater management criteria consistent with the water quality protection provisions of the Virginia Stormwater Management Regulations (4 VAC 50-60); and • for land disturbance over 2,500 square feet, comply with the requirements of the Virginia Erosion and Sediment Control Handbook (DCR, Third Edition, 1992). <p>Note that the only land-disturbing activities allowed in RPAs are those associated with:</p> <ul style="list-style-type: none"> o Construction of water wells; o Construction of passive recreation facilities such as boardwalks, trails, and pathways; and o Historic preservation and archaeological activities. <p>In addition, the development criteria for RPAs limit land development therein (see the Chesapeake Bay Preservation Area Designation and Management Regulations at 9 VAC 10-20-130.1). Such development is allowed, subject to approval by the local government, only if:</p> <ul style="list-style-type: none"> • It is water-dependent (a development that cannot exist outside of the RPA and must be located on the shoreline due to its nature: ports, power plant intakes and outfalls, water and sewage treatment plants, marinas, beaches, and marine resources facilities; see 9 VAC 10-20-40); • It constitutes re-development; • It constitutes development or re-development within a designated “Intensely Developed Area;” • It is a new use in the nature of a permitted encroachment, as defined (9 VAC 10-20-130.4.a.); • It is a road or driveway crossing satisfying certain conditions (no reasonable alternatives, etc.; see 9 VAC 10-20-130.1.d.); • It is a flood control or stormwater management facility meeting certain conditions (minimum necessary size, approved stormwater program, etc.; see 9 VAC 10-20-130.1.e.). 			
Response			
Fort Belvoir will comply with all federal regulations and state-implemented federal regulations applicable to the proposed action, and will coordinate with all affected state agencies to ensure the maximum practicable protection of natural resources.			

Commenter	Comment #	Comment Type	Name
S2	S2.43	State Agency	Ellie Irons
Section	Page Number	Organization	
4.8 Biological Resources		Virginia Department of Environmental Quality	
Comment			
<p>(b) Analysis. The Draft EIS indicates that Fort Belvoir has approximately 1,984 acres of RPAs (page 4-223, section 4.7.1.5.1). It also indicates that approximately 14 acres of RPAs would be affected, in that seven proposed projects that are part of BRAC development would encroach into RPAs. The Draft EIS indicates that roads may be constructed in RPAs if certain conditions are met (page 4-231, section 4.7.2.3.2, Table 4.7-10). The federal consistency determination indicates that the encroachments would be limited to roads and utility corridors (Draft EIS, Appendix C, page C-9, “Coastal Lands Management” heading in chart).</p> <p>The Draft EIS also indicates that riparian areas indicated on the water resources map (Figure 4.7-1, page 4-205) represent areas within 35 feet of intermittent or perennial streams, inter alia (page 4-223, section 4.7.1.5.1). Under the Regulations, Resource Protection Areas include perennial streams and a buffer of at least 100 feet, not 35 feet, landward of same (see item 4(a)(i) above and 9 VAC 10-20-80.B in the Regulations.)</p>			
Response			
See the response to Comment L5.102. The referenced text on Page 4-223 refers to riparian areas as identified by Fort Belvoir beyond the 100-foot RPA buffers, not RPAs themselves.			

Commenter	Comment #	Comment Type	Name
S2	S2.44	State Agency	Ellie Irons
Section	Page Number	Organization	
4.7 Water Resources		Virginia Department of Environmental Quality	
Comment			
<p>(c) Chesapeake Ecosystem Unified Plan. The 1998 Federal Agencies' Chesapeake Ecosystem Unified Plan requires the signatories, including the Department of Defense/Army, to fully cooperate with local and state governments in carrying out voluntary and mandatory actions to comply with the management of stormwater. In that Plan, the agencies also committed to encouraging construction design that:</p> <ul style="list-style-type: none"> • minimizes natural area loss on new and rehabilitated federal facilities; • adopts low-impact development and best management technologies for storm water, sediment and erosion control, and reduces impervious surfaces; and • considers the Conservation Landscaping and Bay-Scapes Guide for Federal Land Managers. <p>The general performance criteria exempt silvicultural activities in Chesapeake Bay Preservation Areas, provided that silvicultural operations adhere to water quality protection procedures prescribed by the Virginia Department of Forestry in its Forestry Best Management Practices for Water Quality in Virginia Technical Guide (1997) (see the Regulations at 9 VAC 10-20-120.10). The Technical Guide specifically recommends:</p> <p>... all Streamside Management Zones (SMZs) be a minimum of 50 feet in width, measured from the top of the stream bank. This 50-foot SMZ is a managed forest; within this managed area up to 50% of the basal area or up to 50% of the forest canopy can be harvested.</p>			
Response			
The comment identifies specific state environmental requirements that must be considered by the Army throughout the project planning and development process. The EIS states that state regulations would be adhered to.			

Commenter	Comment #	Comment Type	Name
S2	S2.45	State Agency	Ellie Irons
Section	Page Number	Organization	
4.7 Water Resources		Virginia Department of Environmental Quality	
Comment			
<p>(d) Chesapeake 2000 Agreement. The Chesapeake 2000 Agreement committed the government agency signatories to a number of sound land use and stormwater quality controls. The signatories additionally committed their agencies to lead by example with respect to controlling nutrient, sediment and chemical contaminant runoff from government properties. In December 2001, the Executive Council of the Chesapeake Bay Program issued Directive No. 01-1, Managing Storm Water on State, Federal and District-owned Lands and Facilities, which includes specific commitments for agencies to lead by example with respect to stormwater control.</p>			
Response			
The comment notes specific state environmental requirements that must be considered by the Army throughout the project planning and development process. No change was made to the EIS text, which states that state regulations would be adhered to.			

Commenter	Comment #	Comment Type	Name
S2	S2.46	State Agency	Ellie Irons
Section	Page Number	Organization	
4.7 Water Resources		Virginia Department of Environmental Quality	
Comment			
<p>(e) Conclusion on Coastal Lands Management Consistency. Provided that the BRAC projects at Fort Belvoir are in compliance with the following three requirements as well as the foregoing recommendations and requirements, the Division of Chesapeake Bay Local Assistance concurs that the projects are consistent with the Coastal Lands Management enforceable policy of the Virginia Coastal Resources Management Program. The requirements are:</p> <ul style="list-style-type: none"> • Part IV, Land Use and Development Performance Criteria, Chesapeake Bay Preservation Area Designation and Management Regulations, 9 VAC 10-20-110 et seq.; • Stormwater management criteria consistent with water quality protection provisions (4 VAC 50-60-60 et seq.) of the Virginia Stormwater Management Regulations (4 VAC 50-60 et seq.); and • Virginia Erosion and Sediment Control Handbook (Third Edition, 1992). 			
Response			
The comment notes specific state environmental requirements that must be considered by the Army throughout the project planning and development process. No change was made to the EIS text, which states that state regulations would be adhered to.			

Commenter	Comment #	Comment Type	Name
S2	S2.47	State Agency	Ellie Irons
Section	Page Number	Organization	
4.7 Water Resources		Virginia Department of Environmental Quality	
Comment			
<p>5. Non-point Source Pollution Control. The Erosion and Sediment Control Plan requirement applies to projects involving land disturbance of 2,500 square feet or more in Chesapeake Bay Preservation Areas. The following activities are subject to the Plan requirement:</p> <ul style="list-style-type: none"> • clearing and grading activities • installation of staging areas, parking lots, roads, buildings, utilities, or other structures • soil/dredge spoil areas, and • related land conversion activities. <p>Questions may be directed to the appropriate Watershed Office of the Department of Conservation and Recreation. See “Regulatory and Coordination Needs,” item 4, below.</p> <p>Plan development, approval, and compliance would make the project consistent with the Non-point Source Pollution Control enforceable policy of the Virginia Coastal Resources Management Program.</p>			
Response			
The comment notes specific state environmental requirements that must be considered by the Army throughout the project planning and development process. No change was made to the EIS text, which states that state regulations would be adhered to.			

Commenter	Comment #	Comment Type	Name
S2	S2.48	State Agency	Ellie Irons
Section	Page Number	Organization	
4.12 Utilities		Virginia Department of Environmental Quality	
Comment			
<p>6. Point Source Pollution Control. DEQ’s Northern Virginia Regional Office recommends that the Army ensure that capacity for anticipated sanitary wastes is available at Fairfax County’s Noman Cole Wastewater Reclamation Plant (WWRP). New sanitary sewer lines and pump stations are subject to review and approval by DEQ prior to construction. The Army must obtain and comply with Virginia Pollutant Discharge Elimination System (VPDES) permits for such facilities in order to make them consistent with the Point Source Pollution Control enforceable policy of the Virginia Coastal Resources Management Program. See “Regulatory and Coordination Needs,” item 2, below.</p>			
Response			
Comment noted. Thank you for your interest. Your comment will be made part of the administrative record of the action.			

Commenter	Comment #	Comment Type	Name
S2	S2.49	State Agency	Ellie Irons
Section	Page Number	Organization	
4.4 Air Quality		Virginia Department of Environmental Quality	

Comment

1. Air Quality Regulation.

(a) Regulatory Requirements for Construction. As stated above (“Environmental Impacts and Mitigation,” item 3(b)(iv)), the construction projects should be accomplished in full compliance with current and pending Virginia regulatory requirements, through the use of compliant practices and/or products. These requirements appear in 9 VAC 5, Chapter 40 (existing stationary sources), Part II (emission standards) of the Virginia Regulations for the Control and Abatement of Air Pollution. They are:
 Article 1, Visible emissions and fugitive dust and emissions (9 VAC 5-40-60 et seq.);
 Article 39, Asphalt paving operations (9 VAC 5-40-5490 et seq.);
 Article 40, Open burning (9 VAC 5-40-5600 et seq.);
 Article 42, Portable fuel containers (9 VAC 5-40-5700 et seq.);
 Article 49, Architectural and industrial maintenance coatings (9 VAC 5-40-7120 et seq.); and
 Article 50, Consumer products (9 VAC 5-40-7240 et seq.).

The portable fuel container and consumer products rules (Articles 42 and 50) are being revised, and more restrictive requirements will be in effect no later than 2009. This listing is not all-inclusive; the Army and any contractors should ensure compliance with all applicable Virginia air pollution control regulations.

Irrespective of whether stationary sources are above or below the major source threshold, one or more air pollution control permits will be required for the projects.

(b) Coordination. Once the final project plan is selected, the Army should submit applications to DEQ’s Northern Virginia Regional Office. Questions regarding air quality compliance and permit applicability may be directed to that Office (Mr. Terry Darton, Air Permit Manager, telephone (703) 583-3845).

Response

The Army will continue to act in accordance with all existing applicable air quality regulatory requirements for activities over which it has direct control and will meet in a timely manner all regulatory requirements that become applicable in the future. Likewise, the Army actively encourages all tenants and users of its facilities to comply with applicable air quality requirements. The EIS has been updated to reflect the air pollution control regulations specifically outlined in the comment.

Commenter	Comment #	Comment Type	Name
S2	S2.50	State Agency	Ellie Irons
Section	Page Number	Organization	
4.7 Water Resources		Virginia Department of Environmental Quality	

Comment

2. Water Quality Regulation. As indicated above (“Environmental Impacts and Mitigation,” item 5(b)), Virginia Water Protection Permits will be required for project impacts to surface waters. Wetland impacts will also require these permits. The Army should contact DEQ’s Northern Virginia Regional Office (Tom Faha, Water Permits Manager, telephone (703) 583-3846) to pursue appropriate permits governing surface water and wetland impacts.

Response

The comment states specific state environmental requirements that must be considered by the Army throughout the project planning and development process. No change was made to the EIS text, which states that state regulations would be adhered to.

Commenter	Comment #	Comment Type	Name
S2	S2.51	State Agency	Ellie Irons
Section	Page Number	Organization	
4.8 Biological Resources		Virginia Department of Environmental Quality	
Comment			
<p>3. Wildlife Protection. The Army is requested to coordinate with the Department of Game and Inland Fisheries (start with Amy Martin, telephone (804) 367-2211) regarding the siting of the MWR (“Morale, Welfare, and Recreation”) Family Travel Camp project, because of its proximity to potential bald eagle nesting areas and to important hunting areas (see “Environmental Impacts and Mitigation,” item 2(c), above). In addition, the Army is requested to coordinate with the Department relative to the following issues discussed above (“Environmental Impacts and Mitigation,” items 1 and 2, sub-paragraphs indicated):</p> <ul style="list-style-type: none"> • Managing wildlife through hunting activity (item 2(e)) • Effects of projects on anadromous fish waters (item 2(f)(ii)); • Effects of projects on bald eagles and nests (item 2(g)(i). For projects which may affect bald eagles, the Army must also coordinate with the U.S. Fish and Wildlife Service (Eric Davis, Virginia Field Office, telephone (804) 693-6694, extension 104). • Effects of projects on wood turtles (items 1(c) and 2(g)(ii)); • Effects of projects on shortnose sturgeon habitat (item 2(g)(v)); • Planning for, and effects of, the proposed MWR Family Travel Camp (item 2(c), on bald eagle habitat in particular (item 2(g)(i); and • Effects of projects on wildlife habitat in general. <p>In addition, the Army is requested to coordinate with the Department of Game and Inland Fisheries and the U.S. Fish and Wildlife Service (see contact information above) with regard to avoiding the habitat of the small whorled pogonia (see “Environmental Impacts and Mitigation,” item 1(b)(i), above).</p>			
Response			
Fort Belvoir will continue to consult with Virginia agencies as it progresses in implementation of BRAC.			

Commenter	Comment #	Comment Type	Name
S2	S2.52	State Agency	Ellie Irons
Section	Page Number	Organization	
4.6 Geology/Soils		Virginia Department of Environmental Quality	
Comment			
<p>4. Erosion and Sediment Control; Stormwater Management. Erosion and Sediment Control requirements stem from the Virginia Erosion and Sediment Control Law, Virginia Code section 10.1-567; Stormwater Management Plan requirements stem from the Virginia Stormwater Management Law, Virginia Code section 10.1-603.15. The Army must comply with these rules governing erosion and sediment control and stormwater management; as mentioned above, the erosion and sediment control requirement is an enforceable policy of the Virginia Coastal Resources Management Program (“Federal Consistency,” item 7). The Army is encouraged to contact the Department of Conservation and Recreation’s Potomac Watershed Office (Gary Switzer, telephone (540) 347-6420 for erosion and sediment control, and Shelby Hertzler, telephone (540) 351-1589 for stormwater management) and/or local erosion and sediment control and stormwater management officials to obtain assistance in plan development and implementation, and to ensure that controls are in compliance with applicable requirements during and after construction of the project.</p>			
Response			
Erosion and sediment control within the context of the Virginia Storm Water Management Program are discussed in Section 4.7.1.3.1. The Army will prepare and implement an erosion and sediment control plan before beginning any construction associated with BRAC facilities.			

Commenter	Comment #	Comment Type	Name
S2	S2.53	State Agency	Ellie Irons
Section	Page Number	Organization	
4.13 Hazardous Waste		Virginia Department of Environmental Quality	
Comment			
<p>(a) Contamination. Any soil suspected of contamination, or wastes that are generated, must be tested and disposed of in accordance with applicable federal, state, and local laws and regulations. These include, but are not limited to, the Virginia Waste Management Act (Virginia Code sections 10.1-1400 et seq.), the Virginia Hazardous Waste Management Regulations (9 VAC 20-60), and the Virginia Solid Waste Management Regulations (9 VAC 20-80). (See the enclosed DEQ memo, Kohler to Ellis, dated March 27, 2007 for additional citations.) Sampling in accordance with the Hazardous Waste Management Regulations may need to be done on unknown material, such as in the Engineering Proving Grounds (EPG). The Army should also continue using appropriate EPA identification numbers for each specific parcel (i.e., EPG, GSA Parcel, or main base) for tracking hazardous waste.</p> <p>(b) CERCLA Responsibilities. DEQ's Waste Division, Federal Facilities Restoration Program recommends that the Army contact Fort Belvoir's Environmental and Natural Resources Division (Ms. Laura Curtis, telephone (703) 806-0024) for information concerning CERCLA obligations at the Main Post and EPG. This contact is also recommended as pre-requisite to any disturbance of land, sediment, or groundwater at or near Military Munitions Restoration Program sites, Solid Waste Management Units at the Main Post or EPG, or Areas of Potential Concern at EPG (see the discussion of the Historical Records Review, "Environmental Impacts and Mitigation," item 4(c), above).</p> <p>(c) Solid Waste Permitting. The Army should contact DEQ's Northern Virginia Regional Office (Richard Doucette, telephone (703) 583-3813) for questions relating to any of the four solid waste management facilities with solid waste permits in hand or in process (see "Environmental Impacts and Mitigation," item 4(d), above). Similarly, for any new solid waste management facilities, the Army should contact the Regional Office, above.</p> <p>Note that if the material is a solid waste, the waste generator, in this case the Army, has the responsibility for determining whether the waste is hazardous. This can be accomplished by applying the knowledge of the generator of the material, such as using information from the label of a container, or by sampling the material in accordance with the Virginia Hazardous Waste Management Regulations (see item 6(a), above).</p> <p>(d) Demolition or Renovation of Structures. Any structures to be demolished, renovated, or removed should be checked beforehand for asbestos-containing materials and lead-based paint. If asbestos-containing materials are found, the Army must follow the requirements of 9 VAC 20-80-640 as well as other requirements in the Solid Waste Management Regulations cited above (item 6(a)). Similarly, if lead-based paints are found, the Army must follow the requirements of 9 VAC 20-60-261 as well as other requirements in the Hazardous Waste Management Regulations.</p>			
Response			
<p>The Army is working with VDEQ on all matters related to hazardous waste corrective action and management to ensure compliance with all applicable laws and regulations under the CERCLA program including the MMRP. The Army is working with EPA Region 3 on all matters related to hazardous waste corrective action and management to ensure compliance with all applicable laws and regulations under the RCRA program. The Army is working with the VDEQ Northern Virginia regional office regarding solid waste permitting, hazardous waste management, petroleum storage, asbestos, and lead-based paint.</p>			

Commenter	Comment #	Comment Type	Name
S2	S2.54	State Agency	Ellie Irons
Section	Page Number	Organization	
4.9 Cultural Resources		Virginia Department of Environmental Quality	
Comment			
<p>7. Historic Resources Coordination. To ensure compliance with section 106 of the National Historic Preservation Act, the Army is requested to contact the Department of Historic Resources (Marc Holma, telephone (804) 367-2323, extension 114), with regard to the archaeological potential of the GSA Parcel and the evaluation report and recommendation stemming from the Phase II evaluation of Site 44FX 1933 (see "Environmental Impacts and Mitigation," item 6(e), above). The Phase II evaluation report and recommendation should be submitted in two copies to: Mr. Marc Holma Department of Historic Resources 2801 Kensington Avenue Richmond, Virginia 23221.</p>			
Response			
<p>As stated in section 4.9.1.3.1, there is little potential for archaeological resources on the GSA Parcel, and there are no historic properties listed on national, state, or county registers near the GSA Parcel boundaries. Section 106 consultation with VDHR will be conducted prior to any BRAC activities taking place at the GSA parcel.</p>			

Commenter	Comment #	Comment Type	Name
S2	S2.55	State Agency	Ellie Irons
Section	Page Number	Organization	
4.3 Transportation		Virginia Department of Environmental Quality	
Comment			
8. Roads and Transportation. Any VDOT land use requirements, lane closures, traffic control, or work zone safety issues should be closely coordinated with Fairfax County (start with the Department of Planning and Zoning, Noel Kaplan, telephone (703) 324-1210) and with VDOT's Northern Virginia District Office (telephone (703) 383-2888).			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. The Army will cooperate with VDOT on these issues.			

Commenter	Comment #	Comment Type	Name
S2	S2.56	State Agency	Ellie Irons
Section	Page Number	Organization	
4.7 Water Resources		Virginia Department of Environmental Quality	
Comment			
9. Subaqueous Lands Encroachment. As mentioned above ("Federal Consistency..." item 3), a permit may be required from the Marine Resources Commission for any project encroachment channelward of ordinary high water along natural rivers and streams. Inquiries regarding Marine Resources Commission permitting applicability and procedures may be directed to the Commission (Elizabeth Gallup, telephone (757) 247-2200).			
Response			
The comment states specific state environmental requirements that must be considered by the Army throughout the project planning and development process. The EIS states that state regulations would be adhered to. The Army will consult with state agencies as necessary to obtain the required permits. As shown by project locations in Figure 2-6, the Army does not plan to encroach upon any subaqueous lands, but in any case, would adhere to all state requirements for permits as stated.			

Commenter	Comment #	Comment Type	Name
S2	S2.57	State Agency	Ellie Irons
Section	Page Number	Organization	
4.10 Socioeconomics		Virginia Department of Environmental Quality	
Comment			
10. Recreation. Questions regarding the recommendations on recreation facilities ("Environmental Impacts and Mitigation," item 8, above) may be directed to the Department of Conservation and Recreation (Robert Munson, telephone (804) 786-6140). The Family Travel Camp proposal should also be discussed with the Department of Game and Inland Fisheries (see "Regulatory and Coordination Needs," item 3, above) because of the proximity of the site to potential wildlife habitat.			
Response			
Your comment will be made part of the administrative record of the action. The Army will continue to undertake appropriate consultations during BRAC implementation.			

Commenter	Comment #	Comment Type	Name
S2	S2.58	State Agency	Ellie Irons
Section	Page Number	Organization	
4.7 Water Resources		Virginia Department of Environmental Quality	
Comment			
11. Water Supply and Wastewater Coordination.			
(a) Water Supply. Inasmuch as potable water is to be purchased from the Fairfax County Water Authority, the Army should consult with the County (start with the Department of Planning and Zoning, attn: Noel Kaplan, telephone (703) 324-1210) regarding any additional water supply needs; the existing purchase contract may need to be revised. Water supply facilities must also be in compliance with Virginia's Waterworks Regulations (12 VAC 5-590-10 et seq.). Information on development of water supply facilities is available from the Department of Health's Culpeper Field Office (Hugh Eggborn, Director, telephone (540) 829-7340).			
(b) Wastewater. Expansion of wastewater facilities would need to comply with Virginia's Sewage Collection and Treatment Regulations (9 VAC 25-790 et seq.). Information on compliance with these regulations is available from DEQ's Northern Virginia Regional Office (Tom Faha, Water Permits Manager, telephone (703) 583-3846). The Army should also check with the County (contact information above) regarding the capacity of the existing facility to take additional wastewater.			
Response			
The comment states specific state environmental requirements that must be considered by the Army throughout the project planning and development process. No change was made to the EIS text, which states that state regulations would be adhered to.			

Commenter	Comment #	Comment Type	Name
S2	S2.59	State Agency	Ellie Irons
Section	Page Number	Organization	
Other		Virginia Department of Environmental Quality	
Comment			
12. Local Coordination. DEQ recommends that the Army consult fully with Fairfax County in particular (start with the Department of Planning and Zoning, attn: Noel Kaplan, telephone (703) 324-1210) regarding planning for and implementing the BRAC projects.			
Response			
As a result of the Commonwealth's comments, the Army initiated further coordination and consultation with appropriate parties.			

Commenter	Comment #	Comment Type	Name
S3	S3.1	State Agency	Marc Holma
Section	Page Number	Organization	
4.9 Cultural Resources		Virginia Department of Historic Resources	
Comment			
Despite this claim, we suspect that more historic properties have the potential to be adversely affected than just those listed in the DEIS as a result of BRAC at Fort Belvoir. In some instances the impacts that the BRAC and related activities may have cannot be anticipated or mitigated at this time. This is because the implementation plans are not fully known. For example, we understand that the Army is not certain as to which buildings within the Fort Belvoir Historic District will house specific tenants. Without that knowledge it is impossible to assess the impacts that possible alterations necessary to address the mission of new tenants will have on contributing buildings within the historic district.			
Response			
Renovation projects are listed in Section 2.2 of the EIS. The Army will ensure appropriate consultation in the event it is found that some tenants moving into historic buildings require renovations to the facilities. Furthermore, other projects resulting in adverse effects would be addressed in a programmatic agreement in accordance with section 106 of the NHPA and 36 CFR Part 800.			

Commenter	Comment #	Comment Type	Name
S3	S3.2	State Agency	Marc Holma
Section	Page Number	Organization	
4.9 Cultural Resources		Virginia Department of Historic Resources	
Comment			
<p>The National Environmental Policy Act (NEPA) requires federal agencies to identify and evaluate the full range of impacts to the environment that its actions may have. The rapid influx of approximately 22,000 new residents will place increased strain on a11 already over burdened transportation infrastructure in Fairfax County. Additionally, the need for new and affordable housing will likely require local zoning changes, new construction, installation of utilities, and other associated development. These undertakings are likely to affect historic properties beyond Fort Belvoir's reservation boundaries. The environmental document must consider not only the direct consequences of BRAC related activities, but also secondary outcomes that might impact cultural resources. Some of these indirect and secondary effects may include increased auditory and visual impacts resulting from increased automobile traffic, new development in communities serving Fort Belvoir, diminished access to heritage destinations, and new road construction needed to support the increase in population.</p>			
Response			
Text has been added to Section 5.9 to more thoroughly address cumulative effects from these foreseeable indirect activities.			

Commenter	Comment #	Comment Type	Name
S3	S3.3	State Agency	Marc Holma
Section	Page Number	Organization	
4.9 Cultural Resources		Virginia Department of Historic Resources	
Comment			
<p>As described in the DEIS, the transportation analysis and design study for the BRAC action will continue throughout the planning phase and, therefore, more details will emerge as the process matures. However, for the purpose of gathering enough information for the current environmental document, the Army used the regional travel demand model maintained by the Metropolitan Washington Council of Governments (MWCOC) in order to estimate the traffic impacts expected from BRAC. Although this method may be expedient for the purposes of the DEIS, we believe that as the study progresses the implications of BRAC on the transportation infrastructure will be greater than first anticipated. Any negative effects to historic properties caused by increases in traffic-like new road construction-will need to be addressed in the EIS and mitigated for in the Section 106 process.</p>			
Response			
Comment noted. Thank you for your interest. Your comment will be made part of the administrative record of the action.			

Commenter	Comment #	Comment Type	Name
S3	S3.4	State Agency	Marc Holma
Section	Page Number	Organization	
4.2 Land Use		Virginia Department of Historic Resources	
Comment			
<p>Similarly, land use consequences arising from the influx of the approximately 22,000 new employees and residents of Fort Belvoir must be thoroughly examined and their adverse effects to historic properties mitigated in order to satisfy the requirements of NEPA and Section 106. As with the regional transportation situation, an infusion of residents in an area that is finding it difficult to cope with the natural rise in population will only add to an already stretched housing market and public services capability. New construction to meet residential, social, and commercial demands is likely further diminish the existing settings of area historic resources, such as Woodlawn Plantation, and may result in adverse effects due to visual, auditory or other environmental degradations. The ETS document must anticipate such eventualities and take into account those effects that are reasonably foreseeable, may be farther removed in distance and time, and are cumulative. Such a.11 evaluation is also expected within the Sectioi~1 06 process.</p>			
Response			
The Army is considering effects on historic resources for this project and the proper permits are being applied for. Details on this resource are found in section 4.9.			

Commenter	Comment #	Comment Type	Name
S3	S3.5	State Agency	Marc Holma
Section	Page Number	Organization	
4.9 Cultural Resources		Virginia Department of Historic Resources	
Comment			
Sections 4.9.1.3.1 and 4.9.4.1.1 : Has the recommendation for the archaeological potential, or lack thereof, of the GSA Parcel been submitted to DI-IR for review and concurrence?			
Response			
Fort Belvoir would conduct Section 106 consultation with the SHPO and consulting parties before conducting any activities at the GSA Parcel. This would include determining the need for archaeological surveys.			

Commenter	Comment #	Comment Type	Name
S3	S3.6	State Agency	Marc Holma
Section	Page Number	Organization	
4.9 Cultural Resources		Virginia Department of Historic Resources	
Comment			
Section 4.9.2.3.2: It is important to note that additional archaeological evaluation (Phase II investigation) may be necessary to determine the National Register eligibility of sites currently considered potentially eligible. We understand that Phase II evaluation of site 44FX1933 has recently been completed. Please submit two copies of the report when available for our consideration along with the Army's recommendation on National Register eligibility.			
Response			
Comment noted. Thank you for your interest. Your comment will be made part of the administrative record of the action.			

Commenter	Comment #	Comment Type	Name
S4	S4.1	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
<p>The Army is required to prepare the DEIS under NEPA which was enacted by Congress to ensure that whenever federal agencies or wherever federal funds are used for major projects, the impacts of that project on the natural and the human environment must be studied. Different alternatives and their impacts are proposed and analyzed. The purpose is to ensure that when the choice is made on where or how the project will be built, the impacts will be as minimal as possible (or minimized).</p> <p>Typically, during this process, mitigating actions are identified to lessen the negative impacts of the project and are included as a part of the project. But this is not the case here. In its DEIS, the Army has noted the devastating impact the BRAC action will have on the road system around Fort Belvoir and they have listed the mitigating actions needed to address the traffic impacts, but the Army is specifically not proposing to include these mitigating actions in their project or to provide funding for them.</p> <p>Even worse, the Army hints on page 4-137, that Defense Access Road (DAR) funding will be available to help fund road mitigation projects. However, DAR funding is limited, difficult to obtain, and every other BRAC facility in the nation will be fighting for the limited funding available. In fact, many of the 13 mitigating highway improvement projects are not eligible for DAR funding under existing Army law, but the DEIS does not tell you that. The DEIS tells you the funding is available "within the legal authority of the Army" – just not that most of it is not allowed by the law. It appears the Army is relying on the citizens of the Commonwealth to bear the expense of relieving the traffic nightmare the BRAC action will be creating.</p>			
Response			
The Army agrees that impacts are identified and mitigation measures identified. Depending on the circumstances, they can be included in the proposed action or pursued as supporting actions with their own study process. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. The DAR Certification is ongoing and under continuous review.			

Commenter	Comment #	Comment Type	Name
S4	S4.2	State Agency	Pierce Homer
Section	Page Number	Organization	
Other		VDOT	
Comment			
<p>The DEIS essentially describes potential land use changes attributable to BRAC studies but defers the required analysis of associated environmental consequences generated by a decision until after approvals are granted. It fails the test of reasonableness by excluding discussions of direct and indirect impacts related to transportation infrastructure improvements necessary to support implementation of the preferred alternative changes. The focus is on what is occurring at the Fort, not the direct impacts and effects on the surrounding roadways and the indirect impacts on the surrounding roadways as well.</p> <p>This action by the Army will have a significant adverse impact on the quality of life for the human environment for those who live near the Fort, in the Region, and are just passing through on the main highways that will be affected. Additional time spent stopped in traffic is a negative impact on our quality of life. Even more disturbing is how safety is negatively impacted by increases in traffic and backups on the interstates and throughways which can cause more accidents with resulting fatalities and injuries.</p> <p>These reviews of direct, indirect and cumulative impacts are required under NEPA as part of the "hard look" that is required of a federal agency proposing to take a major action so that they will make an informed decision when they do make a decision. The Army is making an independent decision as if it were in a vacuum without regard for what or how the direct, indirect or cumulative impacts of its action will affect the human and natural environment around and in the vicinity of the Fort and in that region and for people using the main highways passing through the region. Congress enacted NEPA to prevent this very situation from occurring.</p>			
Response			
<p>The draft EIS identifies road improvements as mitigation. The Army believes it has appropriately exercised its discretion in defining the scope of the EIS and, accordingly, taken the requisite hard look which has resulted in a comprehensive analysis of transportation. However, the Army recognizes the need for additional studies. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.</p>			

Commenter	Comment #	Comment Type	Name
S4	S4.3	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
<p>The designation of a preferred alternative appears to be based upon the acknowledgement that "...traffic-related issues and development density; specifically, use of the EPG for all base realignment units, agencies and activities would have resulted in development densities that might not be supportable because of traffic congestion." Notwithstanding this recognition, the DEIS excludes substantive analysis of site access requirements. The DEIS fails to adequately identify needed independent transportation improvements, any associated effects, funding sources, timing requirements and required approvals. Furthermore, it lacks evidence of required consultation under NEPA with state and federal transportation officials to address this issue.</p>			
Response			
<p>The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. This process is consistent with the tiering process envisioned in the CEQ regulations.</p>			

Commenter	Comment #	Comment Type	Name
S4	S4.4	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
<p>The Army's DEIS quite openly states that its focus is facing inward in this project - focusing on building new buildings on the EPG for new personnel, building roads on the post for on post traffic and getting the Fairfax County Parkway completed with some new access points so that their personnel can get to work at the EPG and on the Fort as quickly as possible. But that only addresses a very small portion of the traffic impact that will occur when 22,000 new personnel show up on September 15, 2011. Page 4-84 of the DEIS states,</p> <p>Implementing the Preferred Alternative would result in significant adverse effects to the transportation system with respect to congestion and increased travel time. These effects would lead to reduced employee productivity, higher commuting costs, and degradation of quality of life. These effects would not be limited to personnel at Fort Belvoir. Through commuters and the local community would also be affected.</p> <p>The Army's failure to include in its proposed preferred alternative adequate road improvements needed to mitigate the impacts of its BRAC action on the human environment fails to meet the purpose of NEPA. The Army is proposing to develop the EPG into an office park for 18,000 people to work there. The DEIS also indicates they are planning on renting out office space on the EPG for profit – how many more people will that bring to the post? The DEIS just indicates that that impact will be addressed in the future.</p>			
Response			
<p>The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD.</p>			

Commenter	Comment #	Comment Type	Name
S4	S4.5	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
<p>Therefore, the Army should amend the DEIS to comply with NEPA, to address the impacts the BRAC action will have on the roadway system in the vicinity of the post and to include actions to mitigate the impacts they will be causing. The Army needs to adhere to Federal law by adequately mitigating the impacts its actions will have on the transportation systems and thus reduce the significant, negative effect it will have on the quality of life of our citizens.</p>			
Response			
<p>The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. Funding of transportation projects will also be addressed in the ROD.</p>			

Commenter	Comment #	Comment Type	Name
S4	S4.6	State Agency	Pierce Homer
Section	Page Number	Organization	
Other		VDOT	
Comment			
<p>Part 1501.7 – Scoping This section of the regulations requires the determination of the scope and the significant issues of the proposed action that are to be analyzed in depth in the environmental impact statement. “Scope” is defined in 40 CFR Section 1508.25. It “consists of the range of actions, alternatives, and impacts to be considered in an environmental impact statement. . . . To determine the scope of environmental impact statements, agencies shall consider 3 types of actions, 3 types of alternatives, and 3 types of impacts.” The Army inappropriately limited its scope to obtaining a revised land use plan and to realigning its functions as directed by the BRAC commission. However, in accordance with NEPA, the scope of this action would include most if not all of the list of 13 mitigating highway improvements because they are connected actions as defined in 40 CFR Section 1508.25(a)(1). The Army's action meets the criteria for connected actions with the transportation mitigation improvements under NEPA because the Army's action automatically triggers the transportation mitigation improvements.</p>			
Response			
<p>Case law establishes that, under the National Environmental Policy Act, a proponent is not required to provide mitigation. Thus, the road improvements are not connected actions. Even so, the Army has considered road improvements as potential mitigation, as set forth in 40 CFR 1508.25(b)(3) to learn fully and to inform the public the potential effects of its proposals. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. Additional NEPA analysis may be required for some of the projects.</p>			

Commenter	Comment #	Comment Type	Name
S4	S4.7	State Agency	Pierce Homer
Section	Page Number	Organization	
Other		VDOT	
Comment			
<p>The Army states its purpose as twofold in this DEIS – to revise its land use plan within its master plan and to realign its function in accordance with the BRAC commission mandate. The bottom line is that the major purpose of the BRAC realignment is to have 22,000 new personnel show up for work by September 2011 and the need is to address the environmental impacts through the NEPA process that this huge federal action will have on both the human and the natural environment both in the region of the Fort, in the vicinity of the Fort and in the immediate area of the Fort and on the Fort itself. The scope, purpose and need enumerated and chosen by the Army is so limited that it does not meet the requirements of NEPA. The scope must be revised to include the transportation needs and impacts related to getting the BRAC action employees in place and mitigating the adverse impacts caused by that action and the purpose and need also need to be revised to include those true factors as well.</p> <p>In addition, the draft DEIS presented by the Army does not fulfill the purpose required by the regulations in part because it has not provided full and fair discussions of the significant environmental impacts, including impacts on the human environment regarding transportation impacts and it has not been used by Federal officials to plan actions and make decisions regarding transportation improvements that are obviously necessary to support the preferred alternative.</p>			
Response			
<p>The Army may fund road improvements through referral of requirements to the Defense Access Roads Program, but the Army does not build those roads. Accordingly, the Army has appropriately scoped the EIS, to include consideration of road improvements as possible mitigation measures. The EIS analysis showing that there would be significant adverse effects on transportation demonstrates full and complete disclosure as intended by the National Environmental Policy Act. In this regard, the Army has completely met the intent of the law.</p>			

Commenter	Comment #	Comment Type	Name
S4	S4.8	State Agency	Pierce Homer
Section	Page Number	Organization	
Other		VDOT	
Comment			
<p>In Summary, the DEIS only addresses alternatives related to land use changes on Fort Belvoir in order to determine such issues as where will the office spaces be for the 22,000 additional employees arriving by 2011 in response to the BRAC action. It does not discuss the required highway improvements necessary for providing access to the site for those employees nor does it address in any detail the necessary roadway improvements in the surrounding roadway network that will be necessary to address the impact that additional inflow and outflow will have. The DEIS does not address effects and values in adequate detail to support informed decision-making or to compare environmental, economic, and technical issues as required by the federal regulations for proper decision making.</p> <p>The failure to adequately evaluate site access concurrently with land use planning means that the land use recommendations made in the DEIS may not be appropriately developed for decision-making at this time. Unknown factors surrounding the viability of highway access could later invalidate land use decisions. Those unknown factors include the environmental impacts of road improvements, the need for enabling state and federal approvals, the extent of improvement needed and a source of funding for that work. Failure to address those issues concurrent with the land use study could undermine the purpose and need for land use changes and compromise study schedules.</p>			
Response			
<p>The Army is satisfied that information in the EIS will support sound decision making. Further work with respect to the Real Property Master Plan may cause adjustment but not wholesale change in the Army's view. The EIS provides a plan for transportation mitigation that can be used by planners at all levels of government.</p>			

Commenter	Comment #	Comment Type	Name
S4	S4.9	State Agency	Pierce Homer
Section	Page Number	Organization	
Other		VDOT	
Comment			
<p>In accordance with 40 CFR Section 1502.9(a), the proposed Draft Environmental Impact Statement (DEIS) is “so inadequate as to preclude meaningful analysis”, therefore the Army must prepare and circulate a revised draft. The scope is flawed and therefore the document needs to be revised in accordance with National Environmental Policy Act (NEPA) requirements.</p> <p>The DEIS not only does not meet the NEPA statutory and regulatory requirements, it is a document of conjecture that is a generalized inventory of existing conditions with generalized references to possible impacts in the future. It needs to be redrafted to comply with the NEPA requirements that are clearly laid out in 40 CFR Sections 1500-1508. Until they have done so, the Army should not consider issuing a Final Environmental Impact Statement and a Record of Decision for the proposed action.</p>			
Response			
<p>Responses to VDOT’s comments indicate that the draft EIS is, in fact, sufficient for sound decision making. The document has been appropriately scoped, and all relevant issues have been adequately analyzed. The Army believes that revision and recirculation would serve no meaningful purpose. The transportation section of the EIS is over 111 pages. It certainly represents the hard look required by NEPA. The problem that many have with the document is the magnitude of the impact, not the adequacy of the analysis</p>			

Commenter	Comment #	Comment Type	Name
S4	S4.10	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
<p>Section 4.3.1.2 - Transportation Analysis and Design states that “At this point, the studies have been taken to a level of detail sufficient for an EIS, thereby allowing for the assessment of the transportation systems and the identification of potential mitigating actions.” We disagree with this statement. More detailed operational analyses are needed to determine the adequacy of the proposed mitigation improvements.</p> <p>The DEIS states: “In the Conference Report on the National Defense Authorization Act for Fiscal Year 2007, the conferees identified the following Items of Special Interest:</p> <p>“The conferees note that the decisions of the 2005 Defense Base Closure and Realignment (BRAC) round will have a significant impact on the transportation infrastructure and national highway system in Northern Virginia supporting Fort Belvoir and Marine Corps Base Quantico. These effects, if not studied and addressed through a long-term investment strategy, have the potential to adversely affect timely access to these two critical military installations, as well as the quality of life for military members and their families on the installations and in the local communities.”</p> <p>“The conferees direct the Secretary of the Army to work with appropriate Federal, Commonwealth, and local agencies to ensure the draft and final environmental impact statements address the following factors:</p> <p>(1) a description of the demographic, population, and other planning assumptions used to determine traffic infrastructure requirements; (2) an analysis of the direct and indirect impact to the transportation infrastructure resulting from the BRAC decisions; (3) a description of the standards and methodologies for the traffic impact studies contained in the study; and (4) an assessment of specific traffic infrastructure improvements and new construction projects identified to mitigate the effects of the increase of personnel, and estimates of the costs to carry out the projects.”</p> <p>We concur with the conferees’ findings that BRAC decision related to Fort Belvoir will have a significant impact on the transportation infrastructure in Northern Virginia and that these impacts will adversely affect the quality of life and therefore the human environment in this region. The DEIS does not meet the mandated requirements the conferees directed the Secretary of the Army to meet and therefore it needs to be redrafted.</p> <p>In addition, it should also be noted that Interstate 95 is the main north/south highway between Maine and Florida and it traverses Fort Belvoir property serving interstate commerce, tourism, commuters, the military, and the Nation’s Capital. This section of highway currently carries an estimated 300,000 vehicles per day, has a level of service F and frequent stop and go conditions. With the addition of the BRAC impacts at Fort Belvoir in 2011 if mitigating road improvements are not put in place to attempt to address the congestion, the commuting wait period on I-95 is expected to lengthen by 30 minutes to 1 hour.</p> <p>Also, The DEIS does not propose a long-term investment strategy to fund any transportation improvements necessitated by the proposed land use changes. Funding is not available through the Commonwealth’s transportation budget to underwrite the cost of these unidentified needs</p>			
Response			
<p>The Army concurs that effects and mitigation measures are identified in the EIS. Depending on the circumstances, they can be included in the proposed action or pursued as supporting actions with their own study process. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. The four requirements have been met, and the Army is continuing to collaborate with government agencies as the project moves forward.</p>			

Commenter	Comment #	Comment Type	Name
S4	S4.11	State Agency	Pierce Homer
Section	Page Number	Organization	
Other		VDOT	
Comment			
<p>1. The alternatives need to be more clearly differentiated from each other. The discussion on the impacts of the alternative components seems to be the same other than the cost. The cost items could be broken down to identify the differences and should qualify whether or not they were done assuming 2007 dollars. Costs should identify whether or not all aspects of project development were included, such as preliminary engineering, right of way, construction and administration as well as escalation for inflation to accommodate the schedules for development. Impact, Cost, and Mitigation matrices should help explain the differences between the Preferred Alternative, the Town Center Alternative, City Center Alternative, the Satellite Campuses Alternative and the No Action Alternative for the following components:</p> <ul style="list-style-type: none"> a. Land Use b. Transportation c. Air Quality d. Noise e. Topography, Geology and Soils f. Water Resources g. Biological Resources h. Cultural Resources i. Socioeconomics j. Aesthetics and Visual Resources k. Utilities l. Hazardous and Toxic Materials m. Unavoidable Adverse Environmental Impacts <p>2. The narrative should revolve around the above matrices to make the discussion easy to follow and to avoid repetition of passages verbatim as currently found in the Draft EIS. Similar passages are presented over and over again in the document, making it hard to read and understand because the "flow" was difficult to assess. It is currently difficult to judge the differences between the impacts of each alternative component because the terminology used cannot be quantified.</p> <p>3. Discussion should refer to figures, tables, or charts to make each point easier to follow and to make the thought less abstract.</p>			
Response			
<p>Cost estimates for road improvements identified in the draft EIS are "order of magnitude" based on best professional judgment of highly experienced experts in the field. The purpose of identifying road improvements was to learn what mitigation measures might be available and appropriate, rather than actually laying the foundation for their implementation. The Army expects that level of engineering detail to follow the environmental impacts analysis process. A summary table of impacts has been added to the Executive Summary of the EIS.</p>			

Commenter	Comment #	Comment Type	Name
S4	S4.12	State Agency	Pierce Homer
Section	Page Number	Organization	
4.2 Land Use	4-19	VDOT	
Comment			
<p>4. Referencing page 4-19 of the document, section 4.2.2.3, some additional discussion of the overall affects of the timing of completion of the Fairfax County Parkway might be necessary.</p>			
Response			
<p>The Army is planning that the parkway will be built in time to accommodate the new organizations at EPG. The Army is working diligently with the state to assure the parkway is completed on time.</p>			

Commenter	Comment #	Comment Type	Name
S4	S4.13	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
5. 2011 is used as the baseline analysis year. With respect to the baseline year, does this assume that for the candidate build alternatives, the Department of the Army is confirming that no additional internal land use changes made beyond 2011 will have consequential affects on the local or regional transportation network?			
Response			
The impact analysis in the EIS is adequate to support an informed selection of the alternatives for BRAC implementation. The on-going Master Plan update and its NEPA analysis will examine the long-term needs of Fort Belvoir, including the 2030 horizon year.			

Commenter	Comment #	Comment Type	Name
S4	S4.14	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
6. For each of the candidate build alternatives, it would be helpful if the discussion of transportation and roadway projects required for mitigation of the affects of implementing the alternative also made clear whether or not the individual projects were already a part of an officially adopted transportation plan or improvement program, state or local.			
Response			
Comment noted.			

Commenter	Comment #	Comment Type	Name
S4	S4.15	State Agency	Pierce Homer
Section	Page Number	Organization	
Other		VDOT	
Comment			
7. The regional effects of this “shift” in employment base to Fort Belvoir and the EPG should also qualitatively consider the re-occupation of sites previously used by the employment base and the potential impact to the regional transportation system.			
Response			
The model includes rebalancing of jobs, and areas like Crystal City only see a net job drop of 3 percent as companies fill in vacated space - in essence full occupancy. Additional text has been added to Section 4.3.1.3.			

Commenter	Comment #	Comment Type	Name
S4	S4.16	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
8. More discussion should be forthcoming from the Department of Army regarding the details of security inspections at the entrance gates of the facilities in question and their potential impact to queues on components of the local network. The impact of security checks on queuing, and proposed mitigation measures, could be addressed in more detail to provide more assurance that such required checks will not impact mainline traffic.			
Response			
The design process will be ongoing, following the Record of Decision to select the land-use alternative and associated transportation mitigating actions. EPG will not have security gates at the access points, but rather each tenant will adopt its own security protocol for its parcel. Section 4.3.8.2 has been updated.			

Commenter	Comment #	Comment Type	Name
S4	S4.17	State Agency	Pierce Homer
Section	Page Number	Organization	
4.4 Air Quality		VDOT	
Comment			
<p>9. There are a number of regionally significant road improvements planned in and around Ft. Belvoir that need to be included in the air analyses in the Draft EIS. The CO microscale analysis and the General Conformity Determination (GCD) both need to address the effect of these anticipated road improvements on vehicle miles traveled and air pollutant emissions in the vicinity of Ft. Belvoir. In addition, the anticipated road improvements must meet all applicable project-level and regional transportation conformity requirements.</p>			
Response			
<p>The Transportation Conformity Rules are applicable to highways and mass transit projects within non-attainment areas and establish the criteria and procedures for determining that transportation plans, programs, and projects that are funded under Title 23 of the U.S.C. or the Federal Transit Act conform to SIPs. Because the proposed action and alternatives are not transportation projects and not adopted, accepted, approved, or funded by the FHWA or FTA, the Transportation Conformity Rules do not apply. The Army has confirmed with MWCOG that the latest planning assumptions associated with the Belvoir BRAC action will be included in the Round 7.1 cooperative forecast for the region. The Army will continue to coordinate with VDEQ and MWCOG to ensure the latest planning assumptions associated with the BRAC within the region are available.</p> <p>The Army has carefully considered all relevant information available and is satisfied that the CO hot spot analysis in the EIS is sufficient to guide sound decision-making. Because the unmitigated transportation conditions would not introduce CO concentrations above the NAAQS, it is believed that further analysis would not produce additional new information bearing on relevant issues.</p>			

Commenter	Comment #	Comment Type	Name
S4	S4.18	State Agency	Pierce Homer
Section	Page Number	Organization	
4.4 Air Quality		VDOT	
Comment			
<p>10. The General Conformity Determination incorrectly assumes that the construction emissions are already accounted for in the inventories for the 1-hour ozone attainment demonstration SIP, based on the belief that they represent a small percentage of the regional projections. As shown in Table 4.4-6, 368 tons per year of NOx emissions (in 2010) is not insignificant and therefore should not be assumed to be accounted for in the 1-hour ozone SIP. In addition, these emissions should not be assumed to be accounted for in the 8-hour ozone SIP that was recently approved by the Metropolitan Washington Air Quality Committee and is currently under public review. Page 3-2 of GCD states "guidance issued by EPA states that if emissions are not readily identifiable in a SIP inventory, the federal agency should coordinate with the state to determine what portion of a category, if any, could or would be allocated to any given project," however this guidance was not followed. The Metropolitan Washington Council of Governments (MWCOG) can provide the amount of construction emissions that were allocated to Fairfax County in both the 1-hour and 8-hour ozone SIPs, and this total can be further scaled down to represent those allocated specifically to Ft. Belvoir by comparing the anticipated employment levels at the Fort compared to the county total, similar to that done in a recent general conformity determination prepared for Dulles Airport.</p> <p>11. The anticipated 200 tons per year of VOC emissions in 2010 from architectural coatings needs to be compared to that allocated for architectural coatings at the Fort in both the 1-hour and 8-hour SIPs. MWCOG can provide the architectural coating amounts that were allocated to Fairfax County in both the 1-hour and 8-hour ozone SIPs, and these estimates should be appropriately scaled down to represent those allocated specifically at the Fort, such as by employment or population. The GCD incorrectly compares the project-related VOC emissions to the entire region wide (including DC and MD) 2005 and 2008 area source emission inventories to conclude that it is a small percentage of regional projections and therefore accounted for in the SIP.</p>			
Response			
<p>The draft general conformity determination was prepared and included in the draft EIS and is included in Appendix E of this Final EIS for reference purposes. The Army is continuing to work with the Commonwealth of Virginia to identify mitigation measures required to conform. The concepts being agreed to include using a developable land calculation in apportioning the SIP inventory data, specifying the enforcement inspection and penalty clauses to be used to monitor mitigation measures during construction, including mitigation measures such as limiting construction on ozone action days, meeting new engine standards for non-road equipment, equipment substitutions, diesel retrofitting, anti-idling restrictions, and the use of alternative fuels. Potential mitigation measures are included in the EIS in Section 4.4.2.3. The Army must make public its Clean Air Act conformity determination by placing a notice by prominent advertisement in a daily newspaper of general circulation in the area affected by the action, and will do so once it is completed. Information on these mitigations will be included in the ROD.</p>			

Commenter	Comment #	Comment Type	Name
S4	S4.19	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
12. The DEIS states that the realignment would decrease both the number of vehicles and subsequently the total vehicle miles traveled within the region. This conclusion seems unlikely considering an additional 22,000 jobs will be moving into the area, and approximately 15 new road improvements have been proposed to accommodate the additional traffic. The effect of this BRAC action and all anticipated road improvements on motor vehicle usage should be better documented through travel demand modeling.			
Response			
An additional paragraph has been added to Section 4.3.4.2.1 to discuss the vehicle miles traveled on how the VMT goes down for BRAC employees on the basis of the assumed redistribution of residential locations.			

Commenter	Comment #	Comment Type	Name
S4	S4.20	State Agency	Pierce Homer
Section	Page Number	Organization	
4.4 Air Quality	4-139	VDOT	
Comment			
13. Page 4-139 – the OTR consists of 12 states and Washington, DC, not 22.			
Response			
The commentor's information has been incorporated into the EIS.			

Commenter	Comment #	Comment Type	Name
S4	S4.21	State Agency	Pierce Homer
Section	Page Number	Organization	
4.4 Air Quality	App E	VDOT	
Comment			
14. Attachment 1, Emission Calculations, Tables A1-1 thru A1-7 – These tables should indicate the calendar year or years that the projected emissions will occur for each line item. In addition, all Worker Vehicle Emissions should include documentation indicating the speed that the mobile source emissions factors represent.			
Response			
Information on matters outlined in the comment appear in Section 2.2.2.3 and Appendix E.1 Section 3.1.1.2.			

Commenter	Comment #	Comment Type	Name
S4	S4.22	State Agency	Pierce Homer
Section	Page Number	Organization	
4.4 Air Quality	App E	VDOT	
Comment			
15. Appendix E.2, Vehicle Microscale CO Concentration Modeling – Indicate the calendar year or years that the CO microscale analysis represents, as the year of expected peak emissions is required to be analyzed.			
Response			
Thank you for the comment. Section 4.4.1.5 was updated with suggested changes.			

Commenter	Comment #	Comment Type	Name
S4	S4.23	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
16. Although funding is alluded to through the Defense Access Road program to “the extent allowed by law”, for accuracy and integrity the restrictive limitations of that funding should be clearly explained so as not to give the impression that the 15 mitigation projects can be built with Army funds. The source of funding for mitigation is an issue in the DEIS and needs to be addressed.			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD.			

Commenter	Comment #	Comment Type	Name
S4	S4.24	State Agency	Pierce Homer
Section	Page Number	Organization	
Other		VDOT	
Comment			
17. In the introduction, “affected jurisdictions” should include more than just Fairfax County. Federal agency offices will be leaving Arlington and other areas to move into Ft. Belvoir; Figure 1-3 shows the extent of the region of influence for this project.			
Response			
The Army believes that Fairfax County is the jurisdiction most affected by its proposed actions. As effects in other jurisdictions are exceedingly attenuated, they have not been listed as affected.			

Commenter	Comment #	Comment Type	Name
S4	S4.25	State Agency	Pierce Homer
Section	Page Number	Organization	
Other	ES-4	VDOT	
Comment			
18. On page ES-4, to provide decision-makers a more complete estimate of the BRAC impacts, an estimated construction cost needs to be provided here for the “20 separate projects” mentioned, or at least refer the reader to the section in the DEIS where they are provided.			
Response			
The draft EIS does not report the Army's estimate of facilities construction costs, as that information is normally not made public prior to acquisition (contract solicitation) actions.			

Commenter	Comment #	Comment Type	Name
S4	S4.26	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	ES-2	VDOT	
Comment			
19. On page ES-2, when reading this paragraph, one gets the impression that employees represent the additional traffic added to the network. Does this DEIS account for all additional trips generated as a result of the proposed development? An example on page ES-3 is with the 2,069 medical personnel. If they work at the proposed new hospital a total of 9,800 trips will be generated based on ITE TRIP Generation Manual. This needs to be clarified.			
Response			
The analysis for the EIS does include the hospital. Those trips as cited by the reviewer would be spread out over a 24-hour period because a hospital operates around-the-clock.			

Commenter	Comment #	Comment Type	Name
S4	S4.27	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	ES-8	VDOT	
Comment			
20. On page ES-8 (ES.6.2), for both accuracy and integrity, it should be made clear that “the developer” in this case is the Federal government.			
Response			
The sentence was revised.			

Commenter	Comment #	Comment Type	Name
S4	S4.28	State Agency	Pierce Homer
Section	Page Number	Organization	
4.4 Air Quality	ES-9	VDOT	
Comment			
21. On page ES-9 (ES.6.3), some explanation is needed to clarify the statement that regional VMT will decrease. Unless some data is provided at a macro level to show that increased commuting distances for personnel formerly commuting to locations in the District of Columbia or Maryland suburbs are balanced by shorter commuting distances for personnel residing south of the installation, it is an intellectual stretch to accept no overall change in VMT.			
Response			
Table 4.3-17 in Section 4.3.4.2.1 of the FEIS was added to demonstrate a reduction in vehicle miles traveled. Information on mobile sources of air emissions appear in Section 4.4.2.2.2 and Appendix E.1 Sections 3.1.1.2 and 3.1.3.2.			

Commenter	Comment #	Comment Type	Name
S4	S4.29	State Agency	Pierce Homer
Section	Page Number	Organization	
Other	ES-16	VDOT	
Comment			
22. On page ES-16, by the same logic, the Federal Government (as the developer of the on-post changes that will impact traffic on adjacent public roads) should be responsible for mitigating these impacts.			
Response			
The draft EIS identifies numerous road improvements to reduce the effects on transportation. To the extent allowed by law, the Army will seek funding to alleviate these effects.			

Commenter	Comment #	Comment Type	Name
S4	S4.30	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	ES-20	VDOT	
Comment			
23. On page ES-20 (ES.8.1), if a 10% mode split reduces cars entering the installation by 725, the implication is that there are still over 6,000 cars entering that will presumably have to be cleared through some form of security check. The plan for quickly conducting such security checks, so that the entering cars do not back up onto mainline traffic, should be summarized here for reader understanding.			
Response			
As the site plans are on-going since the release of the DEIS, the security plan has been refined such that the access points are no longer gated, but each tenant will have their security protocol at their parcel boundaries. Section 4.3.8.2 has been revised.			

Commenter	Comment #	Comment Type	Name
S4	S4.31	State Agency	Pierce Homer
Section	Page Number	Organization	
DOPAA	2-4	VDOT	
Comment			
24. On page 2-4, Table 2-1 will be clearer if like categories are listed in the same horizontal row (e.g., Training opposite Training, etc.).			
Response			
The overall effect of the changes militates toward listing each land use plan's acreages directly. Elimination of certain classifications results in there being gaps in the table and leaving, perhaps, in the reader's mind a question as to the reason for the gap. Accordingly, the Army has chosen the format presented.			

Commenter	Comment #	Comment Type	Name
S4	S4.32	State Agency	Pierce Homer
Section	Page Number	Organization	
DOPAA	2-12	VDOT	
Comment			
25. On page 2-12, (2.2.2.3), first paragraph, first sentence should indicate 6.2 million square feet.....			
Response			
The text was revised to indicate "... 6.2 million square feet ...". Thank you for noting this error.			

Commenter	Comment #	Comment Type	Name
S4	S4.33	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	4-33	VDOT	
Comment			
26. On page 4-33 (4.3.1.2), we take issue with the statement "the analysis completed.....use the year 2011 as the baseline analysis year, as that is the requirement of the reviewing transportation agencies". VDOT uses a design year that is 22 years past the start of construction on proposed roadway improvements. Therefore, similar to the analysis provided for the recent Fort Lee BRAC EIS, we request transportation analyses be provided to determine the long term (2030) impact of the land use alternatives.			
Response			
The impact analysis in the EIS is adequate to support an informed selection of the alternatives for BRAC implementation. The on-going Master Plan update and its NEPA analysis will examine the long term needs of Fort Belvoir, including the 2030 horizon year.			

Commenter	Comment #	Comment Type	Name
S4	S4.34	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	4-33	VDOT	
Comment			
27. On page 4-33 (4.3.1.3), we take issue with the statement "the interpretation and use of the modeling results is solely the responsibility of the EIS preparers." If VDOT is asked to accept maintenance responsibilities for any of the proposed road improvements in the DEIS we must approve of the methodology, assumptions and results of the modeling analysis.			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. The Army cannot control and makes no presumption concerning how other entities might wish to adopt information in the EIS for their own purposes.			

Commenter	Comment #	Comment Type	Name
S4	S4.35	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	4-40	VDOT	
Comment			
28. On page 4-40 (4.3.2.3.1), what impact will additional ridership have on Metrorail and VRE operations? Do these transit systems, stations and parking facilities have excess capacity to handle the increased ridership expected to be generated by the chosen land use alternative?			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.			

Commenter	Comment #	Comment Type	Name
S4	S4.36	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	4-46	VDOT	
Comment			
29. On page 4-46, a comparison of AM and PM travel time contours clearly shows longer commutes in the PM which are likely to worsen with the additional volume generated by the BRAC land use decision.			
Response			
Comment noted.			

Commenter	Comment #	Comment Type	Name
S4	S4.37	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	4-47	VDOT	
Comment			
30. On page 4-47, the TransAction 2030 Plan is a product of the Northern Virginia Transportation Authority (NVTA), not the NVTC (an entity located in Arlington which deals chiefly with transit matters).			
Response			
The text was revised as suggested.			

Commenter	Comment #	Comment Type	Name
S4	S4.38	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	4-49	VDOT	
Comment			
31. On page 4-49, while the theory and information presented are useful when considering the macro effects of the BRAC movement, a more useful discussion would involve identifying the effects on roads in the vicinity of Ft. Belvoir of 22,000 new workers arriving and departing during the peak hours. Such concentrated impacts can not be swept aside by considering impacts on a regional or Fairfax-wide level. A discussion of the effects on the roads in the vicinity of Ft. Belvoir should be included in any future environmental documents, supplemental or final.			
Response			
This section covers regional effects. See Section 4.3.2.5 (Available Capacity and Performance) for the local impacts.			

Commenter	Comment #	Comment Type	Name
S4	S4.39	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	4-50	VDOT	
Comment			
32. On page 4-50, for clarity, the sources should be cited for the volumes offered in Table 4.3-4 and the corresponding LOS.			
Response			
The footnote has been added as requested.			

Commenter	Comment #	Comment Type	Name
S4	S4.40	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	4-50	VDOT	
Comment			
33. On page 4-50, we take issue with the statement the I-95 4th lane improvement “is not expected to alleviate congestion along I-95.....” The widening of I-95 will reduce congestion, improve safety and shorten the length of the peak period in comparison to not widening I-95.			
Response			
The I-95 corridor is congested today. The road improvement project will add to the capacity locally, however will move the bottlenecks within the corridor to another location. In turn, that area would likely still experience congestion because of these new bottlenecks.			

Commenter	Comment #	Comment Type	Name
S4	S4.41	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	4-52	VDOT	
Comment			
34. On page 4-52, the second full paragraph duplicates the content of the first.			
Response			
The second paragraph was deleted, as suggested.			

Commenter	Comment #	Comment Type	Name
S4	S4.42	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	4-53	VDOT	
Comment			
35. On page 4-53 (Figure 4.3-11), what peak hour is this referring to?			
Response			
It refers to AM and PM peak hour.			

Commenter	Comment #	Comment Type	Name
S4	S4.43	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	4-55	VDOT	
Comment			
36. On page 4-55, much of the information in this paragraph does not seem germane to the impact of the BRAC action. While comparison of Fort Belvoir to other development may have some utility, it is only relevant if the other development has similar access characteristics to Fort Belvoir – limited access points, limited transit service, adjacent roadways that are already congested and are physically (not to mention financially) difficult to improve, and limited options for effective mitigation.			
Response			
The purpose of this section is to show what the trip generation rate is for Fort Belvoir and how that compares to other developments of similar size: that during the peak hour Fort Belvoir generates fewer trips than other developments. The issue on limited access does not always affect trip generation rates, it is more due to the duties of reporting personnel. Although there are 22,000 employees at Fort Belvoir, not all are required to report in the morning peak because their duties are spread out. The recommended mitigating options are not generally limited by site constraints.			

Commenter	Comment #	Comment Type	Name
S4	S4.44	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	4-60	VDOT	
Comment			
37. On page 4-60 (Table 4.3-9), U.S. Route 1/Neabsco Creek Bridge project is planned to be under construction in 2007 and therefore is in the TIP/CLRP.			
Response			
The reference was removed from the table. Please note that it is listed in Table 4.3-10 as being completed by 2011.			

Commenter	Comment #	Comment Type	Name
S4	S4.45	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	4-63	VDOT	
Comment			
38. On page 4-63 (4.3.3.3), since a third track is not currently funded for construction, especially within the 2011 planning horizon used in the DEIS, any discussion of it in the DEIS gives the false impression that it will help mitigate the impacts of the BRAC decision. This should be removed or clarified appropriately.			
Response			
We are noting the project is under consideration. However, note the opening sentence of the paragraph no major changes are expected before 2011.			

Commenter	Comment #	Comment Type	Name
S4	S4.46	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	4-66	VDOT	
Comment			
39. On page 4-66 & 4-67, the reason to include statewide and regional population numbers in these tables (and similar tables for other alternatives) is not clear as this information is not germane. At the micro level, the increase of 22,000 people on Fort Belvoir does have significant transportation impacts on the roads in the immediate vicinity of the installation. We disagree with the premise that traffic volumes on roadways surrounding Ft. Belvoir would naturally occur under the No Action since there is no guarantee where future development will occur within the Washington Metropolitan Region.			
Response			
We are using the approved MPO land use adopted by the region, and while not guaranteed, past experience indicates development to the projected levels is likely. A number of these developments are under construction and will be open by 2011.			

Commenter	Comment #	Comment Type	Name
S4	S4.47	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	4-69	VDOT	
Comment			
40. On page 4-69, recommend clarifying the “completion” date (open to traffic, total project closeout, some other meaning?) for the Wilson Bridge project. The project website indicates that the second span will be open to traffic in 2008.			
Response			
Projects in this project listing are assumed to be completed by 2011. As the commentator correctly identifies, the second span will be open to traffic in 2008 per the schedule, thus it will be completed by 2011.			

Commenter	Comment #	Comment Type	Name
S4	S4.48	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	4-79	VDOT	
Comment			
41. On page 4-79, a consideration mentioned, but admittedly difficult to address in much detail, is the additional impact on congestion caused by consultants and others who do business with agencies to be located on the installation. The additional vehicles on the system from these employees could lower the LOS and makes the importance of mitigating measures even greater.			
Response			
The embedded contractors are considered as part of the employment levels for WHS and NGA. Non-embedded contractors are considered as part of the visitors in the model, with an estimated 900 daily visitors to NGA and WHS, similar to the daily visitors to the Pentagon.			

Commenter	Comment #	Comment Type	Name
S4	S4.49	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	4-83	VDOT	
Comment			
42. On page 4-83, it should be clarified that the 2,000 – 3,000 vph available capacity and the resultant hours of queuing refer only to the roadway capacity – from Table 4.3-6 it is clear that security processing for that number of vehicles may extend the queuing for an even longer time. This should be clarified.			
Response			
Text was added to state roadway capacity.			

Commenter	Comment #	Comment Type	Name
S4	S4.50	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	4-85	VDOT	
Comment			
43. On page 4-85, the “rideshare facility” needs to be described more fully, even if only conceptually. Is this a parking lot and if so, how many spaces? Where is it located and how will it be accessed? How many security gates will process vehicles going to the facility in the morning commuter arrival periods? Is a bus terminal or transfer station envisioned?			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Following adopting of these mitigating actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.			

Commenter	Comment #	Comment Type	Name
S4	S4.51	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	4-85	VDOT	
Comment			
44. On page 4-85, there needs to be clarification whether this “additional EPG access” refers to additional highway entrances to EPG, additional security gates, or both.			
Response			
These refer to additional roadway links.			

Commenter	Comment #	Comment Type	Name
S4	S4.52	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	4-85	VDOT	
Comment			
45. On page 4-85 and all other sections devoted to listing transportation mitigations, specific improvements should be identified. Currently, the DEIS lists general improvements such as “Fairfax County Parkway Improvements between I-95 and Kingman Road”. What are the specific improvements to the Fairfax County Parkway needed to mitigate the impact of the BRAC development? There are other examples on these lists where more specific mitigation strategies should be identified.			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Following adopting of these mitigating actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.			

Commenter	Comment #	Comment Type	Name
S4	S4.53	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	4-85	VDOT	
Comment			
46. On page 4-85 and all other sections devoted to listing transportation mitigations, specific improvements to the ramp servicing traffic from northbound I-95 to westbound Fairfax County Parkway are not mentioned even though the development of EPG greatly impacts this ramp.			
47. On page 4-85 and all other sections devoted to listing transportation mitigations, specific improvements to the Fairfax County Parkway/Franconia Springfield interchange are not mentioned even though the development of EPG greatly impacts this interchange.			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.			

Commenter	Comment #	Comment Type	Name
S4	S4.54	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	4-86	VDOT	
Comment			
48. On page 4-86, clarify whether the order-of-magnitude costs include a factor for right-of-way acquisition or the assumption that none is needed and a factor for utility relocation (typically a significant percentage of the overall project cost in northern Virginia).			
Response			
ROW acquisition is not included. These costs are usually included when more detailed design is available.			

Commenter	Comment #	Comment Type	Name
S4	S4.55	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	4-88	VDOT	
Comment			
49. On page 4-88, greatly expanded transit service should be considered among mitigation options. With a major transit center (Franconia-Springfield, with both Metrorail and VRE service) about 1 mile from the EPG site, a much more extensive shuttle service from the center to EPG should be considered in order to help achieve a mode share greater than 10%. If the security check is performed at the transit center and designated commuter parking lots during the AM peak period, access time at EPG will be reduced. As indicated (page 4-89), shuttle bus service compares very favorably, in financial terms, with other mitigation options. In view of the cost, and project implementation lead time, for improving the affected highway network it may be useful for the Federal Government to consider increasing its monthly subsidy payment for those BRAC employees who use public transportation, at least on a temporary basis.			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD.			

Commenter	Comment #	Comment Type	Name
S4	S4.56	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	4-89	VDOT	
Comment			
50. On page 4-89, the TDMC section is insufficient. An effective TDM component is critical to the success of the transportation system in the area. Goals need to be established for reductions to single occupancy vehicle use. Telework, carpooling, vanpooling, bus VRE and Metrorail use need to be optimized. Improvements/increases to park and ride and transit transfer facilities need to be specifically identified and funded. A reduced parking ratio and/or parking charges should be analyzed. The Army should consider providing a significant contribution toward a VDOT regional TMP that is currently under consideration for all "MEGA" projects in Northern Virginia that are nearing construction.			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD.			

Commenter	Comment #	Comment Type	Name
S4	S4.57	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	4-89	VDOT	
Comment			
51. On page 4-89, please provide details on how the cost estimates for the transit related mitigations actions were derived. Did area transit providers participate in reviewing these estimates?			
Response			
Costs are preliminary and have not been developed with transit providers yet. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. If the ROD accepts transit as a mitigating action, further details will be developed in conjunction with the transit providers.			

Commenter	Comment #	Comment Type	Name
S4	S4.58	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	4-92	VDOT	
Comment			
52. On page 4-92, was the time for security processing of commuter buses examined or estimated in order to gauge whether this impact creates significant delays or queues on access roads? 350 riders (5% mode share) equates to about 9 buses in the peak period.			
Response			
Security checking time has not been calculated. Please refer to Section 4.3.8.2 for revised security operating scenarios for EPG.			

Commenter	Comment #	Comment Type	Name
S4	S4.59	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	4-134	VDOT	
Comment			
53. On page 4-134, even assuming a 33% mode shift to transit or carpools, 18,000 new employees at EPG translates to at least 12,000 vehicles desiring to enter the site, probably during a 1 or 2-hour period. What is the estimated time it will take to clear these vehicles into the outer perimeter, either using tag-reading equipment or personnel viewing a decal on the vehicle? What length queue will this clearance generate? Will commuter buses have a significant impact on this?			
Response			
Commuting patterns suggest a 3-hour arrival time, thus about 4,000 cars per hour. If the ROD adopts transit services to EPG, vehicular trip generation rate will decrease.			

Commenter	Comment #	Comment Type	Name
S4	S4.60	State Agency	Pierce Homer
Section	Page Number	Organization	
4.5 Noise		VDOT	
Comment			
54. No transportation related improvements are indicated; therefore each proposed improvement will need to address traffic noise.			
Response			
The proposed off-post road improvement mitigation measures are not included in the Description of the Proposed Action and Alternatives. Therefore, they were not analyzed.			

Commenter	Comment #	Comment Type	Name
S4	S4.61	State Agency	Pierce Homer
Section	Page Number	Organization	
4.5 Noise		VDOT	
Comment			
55. In Section 4.5.1.4, all noise sensitive land uses should be addressed.			
56. In Section 4.5.1.4, it isn't clear whether air traffic will increase?			
57. In Section 4.5.1.4, were existing and future noise exposure maps generated?			
Response			
Information on matters outlined in the comment appear in Section 4.5. Noise exposure contour maps represents a level of detail unnecessary to adequately understand relevant issues.			

Commenter	Comment #	Comment Type	Name
S4	S4.62	State Agency	Pierce Homer
Section	Page Number	Organization	
4.5 Noise		VDOT	
Comment			
58. Tables 4.5-4 through 4.5-10, should refer to whole numbers per FHWA recommendation as this can prevent a false sense of accuracy. In other words, NSR 8 would approach or exceed the NAC (approach is defined to be within 1 dBA of the NAC, therefore 66 dBA is considered an impact) and would be considered an impacted NSR.			
Response			
Thank you for your comment. The Army has incorporated the commenter's information into Section 4.5 of the FEIS.			

Commenter	Comment #	Comment Type	Name
S4	S4.63	State Agency	Pierce Homer
Section	Page Number	Organization	
4.13 Hazardous Waste		VDOT	
Comment			
59. The document provides conclusions regarding the cost burden for contaminated site “corrective action” for each alternative (see Section 4.13.7) but these conclusions are not substantially supported elsewhere in the document. Moreover, “pre-development preparations requirements” (i.e. contaminated sites investigation, remediation and/or closure) are stated to not be part of the proposed action. Clearly, the presence of these sites and the lack of adequate characterization are critical to the proposed action as these sites could severely limit the ability (both in terms of schedule and cost impacts) of the Fort to meet its commitments under BRAC.			
Response			
Comment noted. The Army is in the process of conducting corrective action on EPG and other sites in anticipation of BRAC.			

Commenter	Comment #	Comment Type	Name
S4	S4.64	State Agency	Pierce Homer
Section	Page Number	Organization	
4.13 Hazardous Waste	4-421	VDOT	
Comment			
60. BRAC also requires the development of a comprehensive funding strategy and establishes a schedule to implement the relocation-related activities. If current funding channels are expected to be part of the overall BRAC funding strategy for addressing the noted hazardous substances/hazardous materials issues, then the Fort could well experience the same “sporadic” funding and resultant “intermittent” corrective action measures plaguing historical progress for these areas (as highlighted on page 4-421).			
Response			
Comment noted. The Army is continuing to secure funding for remaining corrective action activities in anticipation of BRAC.			

Commenter	Comment #	Comment Type	Name
S4	S4.65	State Agency	Pierce Homer
Section	Page Number	Organization	
4.13 Hazardous Waste		VDOT	
Comment			
61. Experience with clearing Solid Waste Management Units (SWMUs) (as well as currently undiscovered contamination sites) for the right-of-way for Fairfax County Parkway have demonstrated the potential significance of delays to schedule and project costs. To highlight such delays, in July 1997 VDOT received written assurances from the Fort that SWMUs on the portion of the EPG required for the Fairfax County Parkway would be remediate and that a “clean [construction] site” would be provided to VDOT. At that point, it was stated that the Fort had conducted “years” of “extensive environmental evaluation” of the EPG and was continuing to remediate remaining SWMUs. To date, such actions have not been completed and the property is currently not suitable for use. Moreover, during the course of the environmental studies, a previously undiscovered contamination area (Former Aboveground Tank Test Site) is now projected to require the remediation of 40,000 yard ³ of contaminated soils and has created off-site disposal capacity issues that are requiring on-site staging of material. Merely addressing the contamination sites to support the (transfer and) use of only a portion of the EPG has taken well over 10 years. The implications to the feasibility of meeting the BRAC schedule and budget are obvious and should be considered.			
Response			
Comment noted. The Army is working with all parties to continue corrective action activities so that sites might be ready for BRAC construction.			

Commenter	Comment #	Comment Type	Name
S4	S4.66	State Agency	Pierce Homer
Section	Page Number	Organization	
4.13 Hazardous Waste		VDOT	
Comment			
62. The DEIS indicates that munitions and explosives of concern (MEC) will be addressed under the Military Munitions Response Program (MMRP), however the program is described as “in its infancy” and that cleanup thresholds are still being developed. Without an understanding of the cleanup requirements for MEC it is difficult to determine the feasibility of land use decisions where such ordnance is suspected or known to be present.			
Response			
Cleanup levels have now been established and the document will be updated. The conservative approach used has proven to be accurate.			

Commenter	Comment #	Comment Type	Name
S4	S4.67	State Agency	Pierce Homer
Section	Page Number	Organization	
4.13 Hazardous Waste		VDOT	
Comment			
63. Cleanup to date at the EPG of munitions and MEC in the proposed footprint for the Fairfax County Parkway has been to a depth of 2 feet and deeper only if needed on a spot by spot basis. Yet, it is VDOT’s understanding that EFLHD is demanding a 10 foot depth removal of soil for construction of the Woodlawn Beulah replacement road on its portion of the EPG. If EFLHD determines that this construction method is appropriate for the Fairfax County Parkway as well, it may affect land use decisions as well.			
Response			
Historical archive searches indicate the most probable munition for each range. The MPM varies on the basis of the training being conducted on the range. UXO clearance is determined according to the MPM. Mines require surface clearing whereas impact areas require clearing deeper. It is not appropriate to compare one range to another without considering this issue.			

Commenter	Comment #	Comment Type	Name
S4	S4.68	State Agency	Pierce Homer
Section	Page Number	Organization	
4.13 Hazardous Waste		VDOT	
Comment			
64. Many contaminated areas that have received a regulatory closure received such closure based on risk-exposure scenarios for current land use. Those land use scenarios will clearly change under BRAC. Therefore, re-evaluation of risk will be likely required and potentially require additional remediation for areas that were previously “closed.” While this issue is mentioned in the document, there should be a discussion of which “closed” areas will require such re-evaluation.			
Response			
Hazardous Waste Management Units (HWMU) M-1, M-2, and M-21 on EPG, which were previously closed, have been re-opened and are currently undergoing investigation to address this issue. See Section 4.13.2.2 of the EIS.			

Commenter	Comment #	Comment Type	Name
S4	S4.69	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
65. The document identified thirteen projects for mitigating adverse effects to the roadway impacts associated with the preferred alternative, whereas, the Secretary’s comments in newspaper article “2011 BRAC deadline tenuous” dated March 14, 2007 indicated fourteen projects. Are there thirteen or fourteen projects?			
Response			
The 14th project is transit services, which is in the section following identification of the 13 projects under transit.			

Commenter	Comment #	Comment Type	Name
S4	S4.70	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
66. The document recognizes the fact that there are no plans for additional capacity in the corridor beyond the planned widening and I-95 HOT lanes; however, it didn't offer mitigation for the congestion due the additional travel demand from the south due to relocation of 22,000 jobs.			
Response			
Comment noted. The Army believes its transportation analysis fairly accounts for volume of traffic related to BRAC implementation.			

Commenter	Comment #	Comment Type	Name
S4	S4.71	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
67. The order of magnitude estimate varies from -25% to +75%. The estimated cost of all thirteen projects appears to be low and should be verified. Furthermore, it's not clear whether the construction phasing and traffic impacts during the construction were considered in developing the estimates. This should be clarified as it can significantly impact the cost associated with pertinent alternatives and may result in selection of a different alternative.			
Response			
The order of magnitude costs were developed using the information available. They do include an allowance for traffic management.			

Commenter	Comment #	Comment Type	Name
S4	S4.72	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
68. Project #3 EPG segment of Fairfax County Parkway is recommended to be widened from four to six lanes. The original plans included six lane facilities except at the Rolling Road, EPG, and Fullerton Road interchanges due to lane drops for the ramps; however, the proposed widening should include six through lanes in addition to the necessary acceleration and deceleration lanes from ramps.			
Response			
Comment notes a design detail. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. The Army believes the issue cited is one that can be resolved as the project design is finalized.			

Commenter	Comment #	Comment Type	Name
S4	S4.73	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
69. The estimated costs for transportation mitigation vary by up to \$742 million depending on which alternative is selected. What method was used to determine if proposed mitigation is adequate to relieve the transportation impacts?			
Response			
The projects are designed to reduce delays associated with the proposed action and limit the possibility of Fort Belvoir traffic backing up onto major regional highways. Also refer to Table 4.3-22 to assess the benefit of implementing the mitigation actions by comparing the before and after effects of roadway improvements for the Preferred Action.			

Commenter	Comment #	Comment Type	Name
S4	S4.74	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
70. Commitments to fund necessary transportation improvements should be identified. Who will be responsible? What types of mechanisms are anticipated to fund the improvements? Is the Army willing to pursue the funding options needed to address the transportation impacts?			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.			

Commenter	Comment #	Comment Type	Name
S4	S4.75	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
71. The DEIS fails to address potential impacts on surrounding communities especially the impacts associated with off-post, mitigative transportation improvements. The DEIS should discuss the various types of impacts on the surrounding communities, including but not limited to: 1) impacts to communities at the points of ingress/egress to the development (increased traffic volumes, reduced quality of life, forced division within established communities, access changes); and 2) impacts on the communities directly adjacent to the development. Alternative land use plans should address the differences in the impacts on these same communities.			
Response			
The impact analysis in the EIS is adequate to support an informed selection of the alternative for BRAC implementation. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.			

Commenter	Comment #	Comment Type	Name
S4	S4.76	State Agency	Pierce Homer
Section	Page Number	Organization	
4.10 Socioeconomics		VDOT	
Comment			
72. The report failed to address the types of surrounding communities as far as race, national origin and income level.			
Response			
Environmental Justice is addressed in Sections 4.10.1.3 and 4.10.2.3.			

Commenter	Comment #	Comment Type	Name
S4	S4.77	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
73. The DEIS does not consider the implementation of transportation system management and operations strategies that can be used to better manage and operate the transportation network under congested conditions and to mitigate non-recurring congestion caused by such events as accidents or special events. Strategies such as CCTV can also increase security and safety on roads surrounding Fort Belvoir and EPG.			
74. Transportation system management and operations congestion mitigation strategies should be listed as a transportation mitigation measures for each land use alternative.			
Response			
Transportation System Management has been added to the list of mitigating actions.			

Commenter	Comment #	Comment Type	Name
S4	S4.78	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
75. Although the report assumes the same number of commute trips with and without the BRAC implementation, there is no discussion on the before and after modes of travel of the 22,000 workers. Many of these person trips are accommodated today by transit and HOV (before condition) but will choose to commute as SOVs to Ft. Belvoir and EPG, causing an increase in vehicle trips in the region and the corridor. More discussions should take place regarding the use of transit by existing employees based upon surveys that were performed as part of the EIS.			
Response			
Travel patterns are discussed in Section 4.2 of the EIS.			

Commenter	Comment #	Comment Type	Name
S4	S4.79	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
76. There is little to no discussion on carpooling /vanpooling to Ft. Belvoir and EPG. A ridesharing facility is recommended but there are no details provided on what it would consist of. There are no forecasts of HOV usage which should be available as a travel forecasting model output.			
Response			
Currently, transit and carpool mode share is less than 10 percent. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. This would include further work on HOV forecasts.			

Commenter	Comment #	Comment Type	Name
S4	S4.80	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
77. There is no discussion regarding the impact on existing and future commuter parking lots along the I-95 corridor. The BRAC action will increase the formation of car and van pools originating to the south and thus increase the demand for commuter parking. An inventory of available commuter lot capacity along the I-95 corridor should be included as well as a forecasts of the increased demand caused by the BRAC action.			
Response			
Currently, transit and carpool mode share is less than 10 percent. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.			

Commenter	Comment #	Comment Type	Name
S4	S4.81	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
78. Did the travel forecasting model consider the National Museum of the U.S. Army? If so, where was it located and how much traffic does it generate?			
Response			
The Museum is not part of the BRAC action, therefore it is not part of the proposed action analysis. The EIS recognizes these impacts, due to the Army Mueseum, as cumulative impacts and is discussed in Section 5.3.1 of the EIS.			

Commenter	Comment #	Comment Type	Name
S4	S4.82	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
79. What is the official study area of the DEIS? A clear and concise map should be included that outlines the study area. We suggest the detailed study include roadways and intersections with more than 10% of the total traffic due to the BRAC action.			
Response			
Ten percent was used for the traffic analysis. The impact analysis in the EIS is adequate to support an informed selection of the alternatives for BRAC implementation. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.			

Commenter	Comment #	Comment Type	Name
S4	S4.83	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
80. The report should address what transportation improvements can be feasibly constructed by September 2011. Based upon the magnitude of the proposed transportation mitigation actions listed in the DEIS, it is extremely doubtful all improvements will be operational by 2011. Additional studies should be performed to determine the appropriate amount of land use that can be accommodated by those transportation improvements that can be practically built by 2011. Land use phasing plans should be developed based upon these analyses.			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. The ROD may contain interim measures to be used until the traffic mitigation projects are completed.			

Commenter	Comment #	Comment Type	Name
S4	S4.84	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
81. Attached to these comments and for the official DEIS record is an independent transportation analysis dated April 25, 2007 of the preferred land use alternative performed by Parsons Brinkerhoff. The Army should consider and incorporate into the FEIS the results and recommendations of this analysis.			
Response			
The receipt of the referenced report is acknowledged and included in Appendix K of the EIS, and revisions to the traffic forecasts have been incorporated. However, most of the analysis and requests for more details are being incorporated into the follow-on studies suggested by FHWA.			

Commenter	Comment #	Comment Type	Name
S4	S4.85	State Agency	Pierce Homer
Section	Page Number	Organization	
Other		VDOT	

Comment
 82. The environmental and traffic impacts of constructing 6 million square feet of building space and 7 million square feet of parking structures on the existing roadway network was not provided. Details of the location of construction entrances, the number of construction workers and the amount and types of construction materials delivered to the site was not included. The negative impacts of construction to commuters and the surrounding neighborhoods over the next three to four years will be tremendous.

Response
 The Army recognizes the potential impact of construction traffic on the surrounding transportation system and is working with VDOT to develop plans for construction entrances. The Corps is initiating efforts to develop a comprehensive Transportation Management Plan for construction in accordance with FHWA guidelines. We also note that the renovation of the Pentagon and relocation of Route 110 through the Pentagon Reservation were both completed within the aggressive timelines required and had minimal impact on the surrounding road network.

Commenter	Comment #	Comment Type	Name
S4	S4.86	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	

Comment
 83. Please provide level of service, volume/capacity ratios, traffic volumes and delay calculations for each link and intersection in the study area. These should be provided for each land use scenario under the build and no build scenarios.

Response
 A full model run was completed for the study area, the detailed analysis focused on critical intersections around the Fort Bevoir sites (Main Post, EPG and GSA). Before and after mitigation analysis were completed for mitigation actions. Please refer to Sections 4.3.2.5 for existing conditions and 4.3.4.4 for proposed mitigations. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.

Commenter	Comment #	Comment Type	Name
S4	S4.87	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	

Comment
 84. Graphics that clearly display the proposed transportation mitigation strategies should be provided in the EIS.

Response
 Design has not begun on project to provide a level of detail to include graphics in the EIS. The Army will indicate in the Record of Decision its decisions with respect to commitment to and funding for mitigation actions.

Commenter	Comment #	Comment Type	Name
S4	S4.88	State Agency	Pierce Homer
Section	Page Number	Organization	
4.4 Air Quality	ES-9	VDOT	

Comment
 85. Please explain the reasoning behind the statement on page ES-9 for why the BRAC action would decrease both the number of vehicles and the total vehicle miles traveled in the region due to a net reduction of 1700 personnel? Wouldn't other personnel be moving into the region by 2011 and occupying the facilities vacated by BRAC personnel? Please explain this.

Response
 Many other sources of air emissions may change in response to the alternatives. These may include the reuse of vacated facilities and leased space. However, the Army would not maintain a continuing program of control over these facilities. Therefore, they do not meet the definition of indirect emissions (40 CFR 93.152). Hence, they were not included in the FEIS (40 CFR 93.153(c)(3)).

Commenter	Comment #	Comment Type	Name
S4	S4.89	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	ES-8	VDOT	
Comment			
86. Page ES-8 states that any significant traffic effects as a result of the BRAC action should be mitigated with transportation improvements – why aren't they suggested by the Army in this document since the adverse effects are documented in this DEIS?			
Response			
Mitigating actions are presented for each land use alternative. The Army will indicate in the Record of Decision its decisions with respect to commitment to and funding for mitigation actions.			

Commenter	Comment #	Comment Type	Name
S4	S4.90	State Agency	Pierce Homer
Section	Page Number	Organization	
4.13 Hazardous Waste		VDOT	
Comment			
87. Were all 4 alternatives compared for hazardous materials and MEC cleanup expenses? Why does the DEIS say that the City Center alternative is the most expensive and the Preferred Alternative is the least expensive when the other 2 alternative don't use EPG land at all?			
Response			
The Town Center and Satellite Campus Alternative also includes UXO areas with substantial costs. Therefore, all alternatives include UXO areas that would require costly UXO clearance. This issue is not isolated to EPG.			

Commenter	Comment #	Comment Type	Name
S4	S4.91	State Agency	Pierce Homer
Section	Page Number	Organization	
4.13 Hazardous Waste		VDOT	
Comment			
88. Why were the hazardous substance and materials cleanups on the EPG in section ES.6.12 NOT included as part of the proposed action? The cleanup of the portion of the EPG that is NOT being used for the Fairfax County Parkway was not being cleaned up to our knowledge for any purpose other than now for BRAC so why is it not included as part of this action?			
Response			
These issues are required predevelopment activities. They are not part of the proposed action and are included only as required predevelopment activities. Moreover, cleanup activities under the hazardous waste laws provide for separate public notification and public involvement.			

Commenter	Comment #	Comment Type	Name
S4	S4.92	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
89. Since the Army is the developer of the EPG, why shouldn't it be responsible for the highway improvements necessary for that development? The DEIS does not address that issue or the mitigation of that impact.			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD. The Army intends to rely on the Defense Access Roads program to assist in funding of necessary road improvements. That program is not without limitations.			

Commenter	Comment #	Comment Type	Name
S4	S4.93	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
90. In section ES.8.1 it states, "Mitigation for impacts to the transportation system could occur with respect to off-post transportation improvements and mass transit expansion." Emphasis added. What is the definition of the transportation system being referred to here?			
Response			
In this instance, "transportation system" refers to roadway network and transit services.			

Commenter	Comment #	Comment Type	Name
S4	S4.94	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	4-33	VDOT	
Comment			
91. In section 4.3.1.2 on page 4-33, does the last sentence in the center paragraph mean that the Army is willing to provide mitigation when it states "The BRAC action would require mitigation strategies to ensure that the impacts due to the BRAC action are mitigated, so that the roadway improvements would provide at least the same level of operation, if not better, than the conditions expected if the BRAC action did not occur."?			
Response			
Yes. The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD.			

Commenter	Comment #	Comment Type	Name
S4	S4.95	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation	4-50	VDOT	
Comment			
92. Since the BRAC action will significantly impact traffic on I-95, please include external trips that pass through the study area in Table 4.3-3 on page 4-50. This is a significant impact and should have been included.			
Response			
A column was added to include total number of trips that pass through the study area to this and similar tables in the EIS. This was done for existing conditions and all the alternatives.			

Commenter	Comment #	Comment Type	Name
S4	S4.96	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
93. Please include tables in the FEIS that clearly outlines specific transportation improvements for each land use alternative necessary to mitigate the impact of the BRAC action along with the detailed cost, the responsible implementing agency and the funding source.			
Response			
The Army continues in its efforts to identify responsible parties and funding sources for road improvements. Section 4.3.4.4 provides the list of mitigations for preferred alternative. Details will be developed in the ROD, as it is the ROD that adopts or rejects mitigation action, and outlines the funding.			

Commenter	Comment #	Comment Type	Name
S4	S4.97	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
94. The Army should strive to maximize the use of transit and HOV facilities as part of this project.			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD.			

Commenter	Comment #	Comment Type	Name
S4	S4.98	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
95. The DEIS provides no financial commitments towards upgrading or providing the necessary transit systems necessary to mitigate the impacts of land use alternatives.			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD.			

Commenter	Comment #	Comment Type	Name
S4	S4.99	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
96. Transit improvements need to be specifically addressed. Start-up and operational costs of transit improvements need to be funded. Shuttle services to and from transit (Springfield Metrorail, VRE, etc.) need to be funded. The Army should also consider funding additional transit to reduce bus headways and increase bus ridership. A base circulator should be considered in order to reduce the need for personal vehicles while on base.			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD.			

Commenter	Comment #	Comment Type	Name
S4	S4.100	State Agency	Pierce Homer
Section	Page Number	Organization	
Other		VDOT	
Comment			
97. Bicycle and pedestrian improvements need to be identified.			
Response			
Potential mitigation measures for bike and pedestrian trails are included in Section 4.3.4.4 of this BRAC EIS. Fort Belvoir's upcoming Master Plan Update and associated NEPA documentation will provide information about the installation's trails and possible incorporation into regional trail systems.			

Commenter	Comment #	Comment Type	Name
S4	S4.101	State Agency	Pierce Homer
Section	Page Number	Organization	
Other		VDOT	
Comment			
98. The ROD should include a timeline for the proposed transportation improvements.			
Response			
Comment noted. The timeline will be considered during preparation of the ROD.			

Commenter	Comment #	Comment Type	Name
S5	S5.1	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
<p>We have a second project, the extension of the Fairfax County Parkway, which is critical to the development of the engineer approving grounds, but again, primarily designed to address current and projected demands in the region, and that project is only partially funded, as we know. We've set aside approximately \$89 million for that. We are to move that project along and we do have some very serious design issues. You design a project to serve the number of jobs on the site and we need to know what that number is before we can complete that design. We have advanced writtable acquisition. In fact, we now own the Central Motors site, which is a very critical piece of the right of way, and we are initiating the design of the utility relocation, which will be helpful when we get a fix on the number of jobs and their actual location to expedite the construction of that facility.</p> <p>However, Colonel, it's important to note that those improvements alone cannot serve this site, and if there's a single message I would leave with you it's that the transportation infrastructure that's laid out in the Draft Environmental Impact Statement, those cannot serve the employment projected for this site. In fact, if you look at committed improvements, we have about \$200 million in the Army's own arithmetic and about \$500 million unfunded that will lead to a very difficult and challenging traffic situation, and I would quote just a couple of points from your own consultant's analysis, "and this assumes that all \$700 million worth of improvements would be made. Queuing of traffic from access point off the Fairfax County Parkway and adjacent to the engineer approving grounds can be expected to back up into the I-95 corridor. This queuing would translate into an extension of the a.m. congested period by over an hour to two hours. In the area surrounding engineer approving grounds, severe congestion will last three to four hours. Along the Fairfax County Parkway east of I-95, the duration of congestion likely would increase by an hour." These are very significant impacts identified by your consultant and they are significant and they do affect the quality of life in these communities.</p>			
Response			
The comment about queuing is true if no mitigating actions are undertaken. Until the Record of Decision determines the Land Use Alternative and transportation mitigating actions to be adopted, as appropriate, the specific employment numbers cannot be determined for EPG. Funding of transportation projects will also be addressed in the ROD.			

Commenter	Comment #	Comment Type	Name
S5	S5.2	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
What, Colonel, we would suggest to you is a couple of thoughts. The first is that the impacts of the BRAC relocation are not fairly reflected in the environmental document. In a community such as this, traffic impacts are the preeminent impact and they do need to be considered as part of the environmental statement.			
Response			
The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. The transportation section of the EIS is over 110 pages. It certainly represents the hard look required by NEPA. The problem that many have with the document is the magnitude of the impact, not the adequacy of the analysis.			

Commenter	Comment #	Comment Type	Name
S5	S5.3	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
<p>Secondly, that the inclusion of the facilities in the environmental document creates the appearance of those facilities actually being funded, but there is no commitment, as of yet, to fund those. Third, that even when fully completed, the full set of improvements do not fully mitigate the impacts of the development. So what do we recommend, and Colonel, I do want to come back because these are very significant and serious issues that we have to deal with. We make several recommendations to you. First is that, as part of the Draft Environmental Impact Statement, it should include the transportation infrastructure as part of that because that's necessary to mitigate the impacts of the BRAC action. Second, we would recommend that there not be a final record of decision, that's the final action for those in the audience, the record of decision is the final action of the federal government, be undertaken until the mitigating road and transit improvements are identified and funded, that also opens up the opportunity for phasing, obviously. So as one of the things that the Army may want to think about is as employment is added or employment is added as infrastructure becomes available.</p>			
Response			
<p>The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD. The ROD probably cannot be delayed without endangering our ability to meet the Congressionally-mandated deadline for BRAC realignment.</p>			

Commenter	Comment #	Comment Type	Name
S5	S5.4	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
<p>Third, in your impact analysis, that you look at long term impacts. In transportation planning, we typically look at a 20 year time horizon, and it's very important that we not focus just on 2011, but we think about 2020, 2030, and the years beyond.</p>			
Response			
<p>The impact analysis in the EIS is adequate to support an informed selection of the alternatives for BRAC implementation. The on-going Master Plan update and its NEPA analysis will examine the long-term needs of Fort Belvoir, including the 2030 horizon year.</p>			

Commenter	Comment #	Comment Type	Name
S5	S5.5	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
<p>Fourth, Colonel, and this is my second to last recommendation, but I believe it's probably the most important. As the representative of Senator Webb, Mr. Reagan indicated earlier, we agree strongly that there should be seriously consideration of the use of the GSA Warehouse site. This could -- in this day and age, it is very difficult to create a regional employment center without any access to public transportation or direct access to HOV. You simply can't do that in this region. The GSA Warehouse site offers that opportunity, and this would help to minimize some of the impacts on the Fairfax County Parkway. It would also allow for direct access to Metro, so job employees coming from the north, as well as VRE employees coming up from the south, leaving, for example, intact the National GIS Spatial Agency onto the engineer approving ground site; that's about 8,500 to 9,000 jobs. Something like that in an agency, which is spread out over 24 hours, allows us to do some of the creative demand management techniques, in terms of flex time, ride sharing, that have worked very, very successfully, and everyone in this room has worked collectively to make some of those things work at the Pentagon. We know how to do this, and the NGA is an excellent agency to employ some of those techniques.</p>			
Response			
<p>The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD. The specific travel demand techniques that the commentator mentioned have been described in Section 4.3.4.4 as TDM tools that a TDM coordinator can implement.</p>			

Commenter	Comment #	Comment Type	Name
S5	S5.6	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
<p>That analysis on pages 436 through 437 likens the effect to reshaping a bean bag, stating that as Army jobs move out of lease space in Crystal City, Reston, Bethesda, and so on, those offices will be filled by other workers currently working elsewhere in this region. Such an assertion simply does not comport with this region's office vacancy factor. Empty space is filled by a domino effect that does not leave empty space elsewhere. Building 6.2 million square feet of new office space will mean a commensurate net regional increase in jobs, and therefore, regional work trips. Such a net increase in jobs also will swell the regions housing sprawl more than has been assumed. In this robust economy, jobs drive growth. According to a recent George Mason University study, one of the reasons, historically, that this region has not adequately planned for its transportation needs is that while job growth has been correctly projected again and again, the number of households that will be created has always been underestimated. "The current round 6.4A forecast assumes 2.2 jobs per household. The proposed round seven forecast assumes 1.8 jobs per household." Reality, according to the George Mason Study, is 1.6 jobs per household. The increased residential sprawl produced by creating a net increase in work space for 22,000 jobs, 6.1 percent of the total employment in Fairfax County currently, will be substantial.</p>			

Response
<p>The study team worked with VDOT and Fairfax County to determine appropriate modeling assumptions, including employee distribution and land use. The modeling efforts used the official MPO land use for the metropolitan region. Changes to the regional total employment is speculation. Also, construction of buildings at Fort Belvoir may mean developers could slow down new building construction elsewhere. The DEIS compares alternative sitings and the use of the adopted regional forecasts provides the best comparison possible. Planning is an on-going process and the Master Plan update and other future efforts will also plan future changes.</p>

Commenter	Comment #	Comment Type	Name
S5	S5.7	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
<p>The conclusion that regional traffic impact will not be significant, also assumes that by September 2011, 50 percent of the personnel whose jobs will be relocated, will shorten their commute by moving closer to EPG Fort Belvoir. Unless this assumption has been tested in a region with comparably high proportion of two income households, such an assumed relocation is overly optimistic. In fact, almost buried back on page 388 is this very point, "an employee's decision to move could depend on factors such as the location of a spouse's places of employment, changing a child's school district, proximity to family and friends, and the cost of housing." Finally, the DEIS assumes that projects on VDOT's six year plan and on the Fairfax County CIP will be completed "within their perspective time frames." First, I hope it's understood that being on the six year plan does not necessarily mean that a project will be completed within six years. With that -- it only means that some work will be taking place during the six year period. With that clarification, a more critical issue is that the DEIS includes these projects in the baseline for determining the impact of adding 22,000 jobs. This is not appropriate. Projects currently on Virginia's six year plan and the Fairfax CIP are being undertaken, as noted by the Secretary, to add desperately needed regional capacity to alleviate current traffic congestion, not to accommodate this massive BRAC relocation, which was not anticipated.</p>			

Response
<p>The Study Team worked with VDOT and Fairfax County to determine appropriate modeling assumptions, including employee distribution, roadway projects, and land use. Only projects included in the TIP and CLRP with a completion date of 2011 were included in the model runs.</p>

Commenter	Comment #	Comment Type	Name
S5	S5.8	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
<p>Statements in the DEIS such as, "hours of congestion along the I-95 corridor, are not expected to increase substantially because the growth and demand would be less than five percent," should be stricken. Five percent more vehicles in a supersaturated solution is total hours and hours of gridlock; now to the local impact. What's puzzling is just that just three pages after that statement, that a five percent increase in demand is not substantial, the DEIS declares, "in areas immediately surrounding EPG, severe congestion, as it's already been noted, lasting three to four hours, would occur if mitigating actions, including transportation improvements, are not taken." This statement is welcome as the tough analysis I applaud. The DEIS then goes on to make a very strong case for and hopefully, underscore, underscore, a commitment to fund under the defense access road program 14 essential transportation projects, including expanded bus service, costing \$458 million for the preferred alternative. I especially want to commend those who put together this draft for following through on my earlier concerns expressed about the critical need for a grade separated intersection at the Franconia Springfield Parkway near Newman Street. It is crucial that the detailed traffic analysis, which justifies all 14 expenditures as a cost of BRAC, not be overridden by sweeping summary statements elsewhere in the DEIS. The DEIS is to be commended for recognizing that state and local agencies require for development "that they control, that developer mitigate those affects with some improvements to the transportation needs."</p>			
Response			
<p>The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD.</p>			

Commenter	Comment #	Comment Type	Name
S5	S5.9	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
<p>Such routine, large developer outlays are over and above significant, local, and state fees, and annual taxes that the military will not be paying as an employer. In this context, it is indeed appropriate that the 14 mitigating transportation improvements be funded by the Army. State and local transportation funding will have more than enough to cover an emirate of other improvements necessitated by BRAC relocation, such as dealing with the significant problems that will be exacerbated on Rolling Road and Backlick Road, and by the way, from Annandale, I took Rolling Road over, even though Google told me to get out on the beltway and come down on 95, and by the way, it's also shorter by mileage, not to mention that I was avoiding congestion, and that's exactly what many of the employees who are currently working in Crystal City and others being relocated will do who live in districts that are identified</p>			
Response			
<p>The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. Funding of transportation projects will also be addressed in the ROD. Secondary roadways have been included in the analyses and mitigation actions have been recommended for secondary roadways.</p>			

Commenter	Comment #	Comment Type	Name
S5	S5.10	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
<p>These transportation projects are, as has already been noted, critical to mitigate reduced employee productivity on "higher commuting and a degradation of quality of life, not limited to personnel, but also through commuters and the local community."These projects are so critical that the relocation of employees to EPG Fort Belvoir must not proceed until all of the direct bolt-on transportation projects are complete and the transit connection are operative. If the funding for these were guaranteed, it is possible that the engineering and design work right of way acquisition and road construction could be completed in four years. However, it is probable that federal environmental analyses and TPB air quality review will push completion of these transportation projects beyond September 2011. This is especially likely if getting TPB approval depends on the highly debatable assertion in the DEIS that "implementing the preferred alternative and the realignment of Fort Belvoir would decrease both the number of vehicles and the total vehicle miles traveled within the region." If this assertion is to be sustained in the air quality review, transit must be revisited, not only for the VRE service to the south, but also for personnel to be relocated who currently live in districts A, D, G, H, and I, which is the area that I was referring to, large portions of which are well served by transit.</p>			
Response			
<p>The Record of Decision will indicate which transportation mitigation actions such as transit and the TMP program will be adopted, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work. Funding of transportation projects, including transit services as appropriate, will also be addressed in the ROD.</p>			

Commenter	Comment #	Comment Type	Name
S5	S5.11	State Agency	Pierce Homer
Section	Page Number	Organization	
4.3 Transportation		VDOT	
Comment			
<p>In addition to requirements that may prevent essential transportation projects from being completed by September 2011, the DEIS notes a number of other reviews and approvals that must occur before the site development and building construction can begin. These issues involve Chesapeake Bay protection areas, wetland preservation, petroleum storage, solid waste management, asbestos, and hazardous materials. In view of these required procedures and the necessity to get congressional funding for congested mitigation projects, I would request that the final EIS contain a specific time table with specific actions that must be completed by date certain or trigger a September, to trigger, excuse me, a September 2011 occupancy being moved back accordingly. For example, the DEIS states "the peak year of construction and renovation expenditures would be 2008," and table 4.10-9 lays out subsequent expenditures year by year. The construction projects used to generate this table should be listed on a critical path to actuate decisions to extend leasing spaces so that the movement of personnel to EPG in Fort Belvoir will be delayed until building construction, and most importantly, all of the bolt-on congestion mitigation steps are in place.</p>			
Response			
<p>Planning for BRAC implementation includes use of critical path methodologies. Without congressional action, the Army is without authority unilaterally to delay implementation beyond September 15, 2011. At this time, publishing a timeline is too speculative. A timeline would be established once funding mechanisms are identified.</p> <p>The Record of Decision will indicate which transportation mitigation actions will be adopted by the Army, as appropriate. For these adopted actions, the Army will cooperate with the County, VDOT, and other federal agencies on required studies and design work.</p>			

Commenter	Comment #	Comment Type	Name
S6	S6.1	State Agency	R.N. Harrington
Section	Page Number	Organization	
Other		Department of Aviation (Virginia)	
Comment			
<p>Thank you for requesting our comments on the Project concerning the Base Realignment and Closure (BRAC) Commission recommendations for Fort Belvoir, Virginia and the associated Draft Environmental Impact Statement (DEIS).</p> <p>The Virginia Department of Aviation has reviewed the document and does not have any comments concerning this project at this time. From our review of the document as presented, the recommendations should have no direct impact on any Virginia airport. The Department of Aviation appreciates the opportunity to comment on this project.</p>			
Response			
<p>The Army thanks you for your consideration.</p>			