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July 24, 2007

Honorable Pete Geren
Secretary of the United States Army
ATTN: SASA
101 Army Pentagon
Washington DC 20310-0101

Dear Secretary Geren:

Fairfax County faces an enormous challenge with the pending arrival of over 22,000 jobs to Fort Belvoir by 2011. The impacts of these planned movements will significantly impair transportation systems, the natural environment, and the quality of life both on- and off-post. I am certain you share our interest in minimizing the impacts caused by BRAC and will take the necessary steps to ensure that all measures identified to mitigate adverse impacts will be incorporated into the BRAC action.

As provided under the National Environmental Policy Act of 1969 (NEPA), Fairfax County submitted extensive 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. The concerns we had on the proposed action and the extent to which the DEIS addressed those concerns were numerous, and included a three-part set of comments, which were endorsed by the Fairfax County Board of Supervisors at its April 30, 2007, meeting. We are greatly disappointed to find that very few of the significant issues identified in those comments were addressed by the Army in the Final Environmental Impact Statement (FEIS), dated July 6, 2007.

While the Army has chosen not to accept comments on the FEIS, we feel that it is imperative to bring to your attention the critical issues we believe must be addressed in the Record of Decision (ROD) or, alternatively, by legislative action.

- **General Services Administration Warehouse Site – The GSA site must be considered as a mitigation measure in the Record of Decision.**

Utilization of this site would put Metro and Virginia Railway Express within walking distance of nearly one third of the 22,000 jobs being relocated, and would tie into broader County and regional planning efforts to focus development at Metro stations. The proximity of the site to the Franconia Springfield Transportation Center and on-going Springfield redevelopment efforts would help minimize overall impacts and costs associated with the BRAC action. In addition, Fairfax County is conducting, through the Springfield Connectivity Study, a detailed analysis of transportation impacts and mitigation costs that include redevelopment of the GSA site. The results of this study, which is funded by the Office of Economic Adjustment, will provide valuable information to the Army, while reducing the expense and time that otherwise would be needed for additional evaluation. Another benefit to the Army is the possibility that, through the County's

existing development process, the transportation improvements in and around the GSA warehouse site could be complemented by those provided through private developers, thereby reducing the overall costs to the Army in developing the GSA warehouse as a BRAC mitigation measure.

- **Transportation** – **An execution plan and timeline for the transportation projects identified in the Final Environmental Impact Statement, including funding commitments, must be demonstrated in the Record of Decision.** In addition, when more detailed planning is completed, the Army should also commit to mitigation and funding of any additional projects that result from future studies.

The FEIS indicates commitments to mitigation measures will be included in the ROD. Transportation is the most critical concern, and we would note that the FEIS 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 FEIS prior to occupancy is critical. The Record of Decision should also commit to the development and implementation of a Transportation Demand Management (TDM) plan; this 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, along with access to public transportation along the Route 1 corridor, could afford opportunities to optimize transit. The FEIS does not commit or address in sufficient detail how the Army would try to optimize the use of transit. Again, we recommend the development of the GSA site as a mitigation measure to optimize transit usage and disperse transportation impacts.

Without a firm commitment to full funding and completion of the necessary transportation impact mitigation measures, we do not see how the BRAC movements can possibly be feasible in the timeframe mandated by BRAC law.

- **Re-designation of Land Use Categories** – **The proposal to pursue a comprehensive reclassification of land use categories and to eliminate the designation of environmentally sensitive areas for Fort Belvoir as part of the FEIS is premature and inappropriate at this time. Changes in the land use plan should be limited to those areas which are required to accommodate the BRAC relocations. Any other land use category changes should be addressed in Fort Belvoir’s Real Property Master Plan process when a full consideration of the reclassification impacts can be evaluated.**

The redesignation of land use categories may have potential implications that extend well beyond anything that has been considered in the FEIS. Of particular note is the proposal to eliminate the “Environmentally Sensitive” land use category, which could have the effect of making environmentally sensitive areas on the Post that are not afforded regulatory protection vulnerable to disturbance. If the Army insists on changes in land use categorization at this time, the ROD should include a commitment that will ensure that all areas previously identified as “Environmentally Sensitive” will remain protected.

Army Regulation 210-20 states that “The Land Use Plan must consider the installation’s *maximum* development potential, over and above requirements based on planned strength” (emphasis added). The FEIS does not address the development potential of the changes being proposed to the land use

The FEIS does not address the development potential of the changes being proposed to the land use plan and the implications to roads, schools, other public facilities and utilities. The Army has stated that the build-out potential will be examined in the more comprehensive RPMP process to follow. However, if the land use plan is already adopted under the ROD it will be too late to evaluate the impacts as required. Wholesale reclassification of the Fort Belvoir land use plan outside of the RPMP process is contrary to the purpose and intent of AR 210-20.

The FEIS indicates the changes to the land use plan are being made in accordance with the Master Planning Technical Manual (MPTM). As we understand it, the revised MPTM is still in draft form and has not yet formally replaced the MPTM dated 13 June 1986. Other FEIS documents for BRAC implementation at Army bases continue to use the 12 land use categories that the current Real Property Master Plan uses, indicating that discretion is allowed in the use of the new categories.

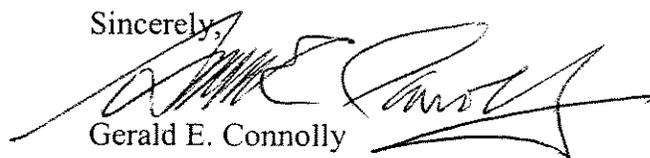
A comprehensive redesignation of land use categories is not needed to support the BRAC relocations; these relocations could be accommodated using the existing land use plan categories, recognizing that these categories would need to be mapped on the Engineer Proving Ground (EPG) site and that some changes in the mapping of these categories on the Main Post may also be needed where BRAC related activities will be sited.

- **Schools** – With the potential increase of over 3,200 students as a result of this BRAC action, the Army must commit to providing financial support to the Fairfax County Public Schools (FCPS) through available federal assistance programs or legislative action. The Record of Decision must clearly demonstrate the Federal commitment to offset the significant financial impacts to the County's public school system.

As a final note, we would like to express our deep frustration with the way the Army has handled the very thoughtfully and diligently prepared public comments on the DEIS. Private citizens, non-profit organizations, local jurisdictions, elected officials, and state and federal agencies took considerable time to review the DEIS and voice their concerns in both written and oral formats. Very few changes of any significance have been made to the FEIS – evidence the Army did not take these comments seriously. Given the importance and magnitude of the effects the BRAC movements will have on Fort Belvoir and the surrounding area, we believe more time and effort should have gone into addressing the issues and concerns of the community. Coordination between the project consultants and County staff to resolve these critical issues is essential. Our point of contact is Mark Canale, the BRAC Coordinator for Fairfax County (703-324-1100).

We look forward to working with you and your staff throughout this process. Thank you for your attention and consideration of our comments.

Sincerely,



Gerald E. Connolly
Chairman, Fairfax County Board of Supervisors

cc: Members, Fairfax County Board of Supervisors
Assistant Secretary of the Army (Installations and Environment)
Assistant Chief of Staff for Installation Management
Deputy Assistant Chief of Staff for Installation Management
Garrison Commander, Fort Belvoir, Virginia
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
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