



County of Fairfax, Virginia

To protect and enrich the quality of life for the people, neighborhoods and diverse communities of Fairfax County

August 8, 2008

Fort Belvoir BRAC
ATTN: BRAC 133 EA Comments
10306 Eaton Place
Suite 340
Fairfax, Virginia 22030

Reference: Final Environmental Assessment and Draft Finding of No Significant Impact for
2005 Base Realignment and Closure (BRAC) Recommendation 133 at Fort
Belvoir, Virginia

Dear Sir or Madam:

Thank you for inviting Fairfax County to provide comments on the Final Environmental Assessment and Draft Finding of No Significant Impact for Implementation of 2005 Base Realignment and Closure (BRAC) Recommendation 133 at Fort Belvoir, Virginia. Attached are comments from Fairfax County staff; these comments will be presented to the Fairfax County Board of Supervisors for review and endorsement at its September 8, 2008 meeting.

Fairfax County again applauds the decision to consider the federally-owned GSA site as part of the BRAC 133 effort and appreciates the considerable amount of effort behind that decision. The proximity of this site to the Franconia-Springfield Transit Center coupled with the benefits of the revitalization of Springfield would help minimize the overall impacts and costs associated with the BRAC action. The redevelopment of the Springfield Mall as a mixed use center could ultimately provide a multitude of residential and leisure opportunities for employees at the GSA site. The proximity of the GSA site to Fort Belvoir, the Pentagon and the re-energized Springfield Mall and downtown area provide a level of convenience not available at any other site under consideration.

It should also be noted the Fairfax County Board of Supervisors has endorsed the GSA site as the preferred location for the BRAC 133 jobs. The Fairfax County Board of Supervisors believes the GSA site is the preferred alternative because it is served by both Metro (rail and bus) and Virginia Rail Express (VRE). The VRE service is critical since many of the 6,400 personnel proposed for this site will be commuting from communities to the south. The Board has continued to stress the need for linkage between the locations of jobs and transportation facilities.

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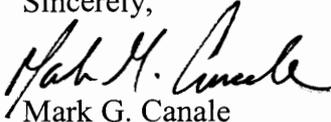
Fort Belvoir BRAC

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A comprehensive set of comments is attached. Thank you for your attention and for your consideration of our comments. If you need additional assistance you can reach me at (703) 324-1177.

Sincerely,



Mark G. Canale

Fairfax County BRAC Coordinator

MGC/mgc

Attachments: As Stated

cc: Members, Fairfax County Board of Supervisors
Anthony H. Griffin, County Executive
Robert A. Stalzer, Deputy County Executive
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
John w. Dargle Jr, Director, Fairfax County Park Authority
Paula C. Sampson, Director, Department of Housing and Community Development
Jack D. Dale, Superintendent, Fairfax County Public Schools
John E. Fisher, Virginia Department of Environmental Quality

**Final Environmental Assessment (EA) for Implementation of 2005 Base
Realignment and Closure (BRAC) Recommendation 133
Fort Belvoir, Virginia
Comments from Fairfax County, Virginia**

This attachment presents a compilation of comments identified through a multi-agency review of the Final Environmental Assessment (EA) and associated Draft Finding of No Significant Impact.

General Comment/Site Selection

Fairfax County has reviewed the EA for BRAC 133 and strongly believes the GSA Warehouse site is the best suited location for BRAC 133, Washington Headquarters Services because this site:

- Is the largest of all three sites (GSA 48 acres, Mark Center 24 acres, and Victory Center 16 acres). The GSA site because of its size affords the best security and can accommodate future expansion.
- Is within walking distance to the Franconia Springfield Metro Station a major transportation/transit hub which offers more transportation alternatives (Metro Bus, Metro Rail, VRE, Fairfax Connector bus service, and connections to the PRTC commuter bus service) than the other two sites and could achieve the highest trip reduction because of its location and transportation options.
- Is already federally owned property therefore it would not impact the local jurisdictions real estate tax base.
- If developed as an office complex to house the Washington Headquarters Service (BRAC 133), the site would become a more compatible land use with the surrounding area because of its close proximity the Franconia Springfield Metro Station. The site is currently developed as a warehouse facility which is not compatible with the surrounding land uses.
- Is located outside of the Capital Beltway which will reduce the number of vehicle trips and congestion along the Capital Beltway (east and west) and inside the Capital Beltway along I-395 (to the north).
- Is closer to Fort Belvoir and the EPG site than the other alternatives.

As another general comment, we commend the Army's commitments to ENERGY STAR[®] and LEED[®] Silver standards (pages ES-12 and 3-117).

Land Use and Compatibility

- As stated in the Executive Summary, ES-2, Summary of Consequences, Land Use: "The long-term adverse effects under the GSA site alternative would be associated with the amount of square footage needed for BRAC 133, which would exceed the 1.2 million square feet called for under the Comprehensive Plan guidelines...."

- The Comprehensive Plan is a guide to decision-making about land use and may be amended by the Board of Supervisors to be responsive to changing circumstances, notably those large in scope such as BRAC-related personnel movements to Fairfax County. As noted in section 3.13.2.1, 3-108, Planned Actions near the GSA Site, a special study and subsequent Plan amendment for the redevelopment of the Springfield Mall area takes into consideration the potential BRAC-133 relocation to the GSA site. The County would anticipate long-term beneficial effects of BRAC-133 relocating to the GSA site within the context of the Comprehensive Plan (the Plan). The Plan states, “because the GSA-Parr Warehouse is a publicly owned property, there is an opportunity for the federal government and the County to work together to facilitate the implementation of the County’s Comprehensive Plan,” (Fairfax County Comprehensive Plan, Area IV, Franconia-Springfield Transit Station Area, Land Unit D, p 46).
- Section 3.13.3.9, 3-112, Socioeconomics, notes that the redevelopment of the GSA site would “contribute to the revitalization of the Springfield Mall area that is already undergoing revitalization,” a position that is also supported by Fairfax County’s Board of Supervisors. The report also states that this revitalization could cause an increase in housing prices; this issue will be addressed under the Board’s recently adopted Policy Plan amendment, (Amendment 2007 P-01) which includes new policies to encourage workforce housing. The Board also supports higher density and mixed use development in proximity to transit stations, as described in the Transit Oriented Development appendix in the Land Use section of the Policy Plan. The proximity of the GSA site to the Franconia-Springfield metro station makes it a prime candidate for redevelopment in accordance with those guidelines. For these reasons, Fairfax County views the use of the GSA site for the BRAC 133 relocation as having long-term beneficial effects on land use.
- We recognize and appreciate revisions to section 3.13.12, 3-108, Present and Future Actions that includes discussion of the BRAC Area Plans Review (APR) process. As noted, this process is used to review proposed changes to the Comprehensive Plan that may be needed to adequately address the impacts of BRAC relocations, particularly in transit-oriented, higher density nodes in proximity to Fort Belvoir and the EPG. This demonstrates the County’s initiative in determining how best to accommodate future employees and residents within southern Fairfax County’s growth centers as a result of BRAC, including the possibility of BRAC-133 relocating to the GSA site.
- Land Use 3.1 - In comparing the three sites the EA states that the GSA site has "constraints on development on three sides" but is much milder in its comments about the issues for the other two sites. For example, the Mark Center is surrounded by I-395 and the Botanical Preserve, but these are not indicated as constraints. The GSA site is nearly or more than double the size of the two

alternatives. The larger land area would appear to give greater flexibility in site design.

- Section 3.9.1.1.1, 3-78, Economic Development – under Population, the report notes that a portion of the ROI growth may be attributed to a large in-migration of a commuter force. Did the EA determine what percentage of the ROI population would be commuters versus residential relocation?
- Section 2.4, Relocation to Other Sites – the criteria established by the Army in its Request for Expression of Interest (REI) for additional sites that could be considered included the statement “In Virginia, within one mile of any Metro Station.” The Mark Center site does not meet this criterion, which should be noted in the evaluation of land use and transportation impacts. This criterion would seem to be critical to the goal of achieving a 40% trip reduction.
- Site Characteristics – Section 3.2.2.1 states the GSA warehouse site is “land-locked.” The GSA site is no more land-locked than the Mark Center or Victory Center sites. Section 3.2.2.3 does not indicate the proximity of the botanical preserve to the south of the Mark Center or the location of railroad tracks and right-of-way to the north of the Victory Center – both factors that should be considered land-locking constraints to expansion opportunities.
- Community Investment Benefit/Economic Development – The Springfield Community Business Center would benefit from an enhanced use at the GSA warehouse site. The EA fails to identify the benefits to the local community and WHS employees to a site with convenient access to transit and other employee amenities, such as close proximity to retail centers and restaurants. The downtown Springfield area currently is serviced by multiple transit options with frequent service between retail and restaurants and the Franconia-Springfield Metro and VRE station. Locating WHS at the GSA site would allow for connectivity options between GSA, the Franconia-Springfield Metro station, and downtown Springfield with relatively small expansion of existing transit services.
- Section 3.13.3.9 fails to quantify impacts to the city of Alexandria from the loss of two tax revenue generating, privately-owned properties. While acknowledging the loss of tax revenue to Alexandria, the EA does not quantify the lost revenue or provide a scale of the magnitude of the lost tax revenue. Additionally, no analysis exists to identify the impact of the loss of transportation management plan funding as called for in the development plans (or ‘proffers’) approved by the city of Alexandria at the Mark and Victory sites. Revenue impacts – in terms of both taxes collected and lost transportation proffer revenue – must be analyzed when assessing long-term cumulative effects to the communities.

Transportation

- As previously stated in the County's comments on the FEIS, the General Service Administration Warehouse Site must be considered as a transportation mitigation measure and not just an alternative. Utilizing of this site would put Metro and Virginia Railway Express within walking distance of nearly one third of the 19,000 jobs being relocated, and would tie broader County and regional planning efforts to focus development around Metro stations. No other alternative considered in the BRAC 133 EA affords more transportation alternatives than the GSA warehouse site. The Mark Center lacks adequate transit access while the Victory Center lacks the number of multi-modal options available at the GSA site.
- The EA notes that sites on Main Post and at the EPG remain "potentially available for selection" and that no further documentation is required since the sites were studied in the Final Environmental Impact Statement (June 2007). Additional transportation improvements at these alternative locations may be necessary upon further study. Additional transportation impact analysis should be performed particularly for the Victory Center and Mark Center alternatives. The developer funded studies only analyzed the impacts of the immediate local road networks. A more regional approach would provide a fair comparison with the GSA site.
- Defense Access Road (DAR) Certification/Congressional Appropriations – The Finding of No Significant Impact (FNSI) and EA at Section 4.1.1.2 states the Army will seek Defense Access Road (DAR) certification for improvements adjacent to the GSA warehouse site. The FNSI and EA also note "should any or all" of the projects not receive DAR certification or a Congressional appropriation for funding, the GSA site should not be considered further, the Victory Center and Mark Center sites do not have this requirement. The technical basis for this conclusion is not supported in Section 3.2.3.1 which discusses various roadway options considered but does not indicate the level of service achieved by various scenarios or combinations of options. The Army should have sought DAR certification to see what improvements qualify under this program as they did with the improvements at the EPG site. The BRAC 133 site decision at GSA should not be based solely on DAR approval or Congressional appropriation action but on the overall regional impacts.
- Trip Reduction – At Section 3.2.5, the Army's goal is to reduce BRAC 133 site trips by 40 percent. The 40 percent goal, while admirable, is unlikely to be achieved without a greater consideration for transit facility proximity at each of the alternative sites. The EA fails to note how the aggressive trip reduction goal will be factored in to the site selection process, other than noting "these measures would be discussed in a Transportation Management Plan (TMP) to be implemented as part of the proposed action" [Section 4.1.1.2]. The GSA site has an advantage over the other two sites because of its proximity to a major transportation/transit hub and the transportation alternatives available.
- The EA fails to outline a strategic plan to reduce single occupancy vehicle trips to the extent noted and does not indicate if a comparable and successful plan is in place elsewhere in the National Capital Region. A 40 percent trip reduction at a

- site not adjacent to a Metrorail station does not seem realistic, especially considering a TMP has yet to be developed, as noted in Section 4.1.1.2.
- Capital Projects – The EA fails to recognize and consider the following regional transportation investments that will impact regional travel:
 - I-495 Beltway HOT (High Occupancy Toll) lanes project. Construction commenced in summer 2008 with completion in 2013.
 - I-95 expansion. Adds a fourth general purpose lane from the Fairfax County Parkway Newington interchange to VA-123. Under construction with estimated completion in 2013.
 - I-95 HOT lanes proposal. This project will add a third High Occupancy Vehicle (HOV) lane with lanes becoming HOT lanes. The final agreement has not been signed; this project is in the planning phase and was recently added to the region's Constrained Long Range Plan. This project will improve vehicle and transit bus transit accessibility in the Springfield area.
 - The Frontier Drive extension cost estimate included in the EA is significantly higher than FCDOT internal estimates. Engineering analysis performed for Fairfax County estimates this improvement at approximately \$52 million or less, depending on the option chosen. This improvement could be constructed for less depending on the design option selected and additional value engineering.
 - "Phase Eight" improvements to the I-95/395/495 Springfield Interchange; under construction with estimated completion in 2013. The Phase Eight improvements are HOV/HOT lane connections at the intersection of the I-495 Beltway and I-95/395. All work is within the existing footprint of the interchange. Project funding and construction are included as a part of the I-495 Beltway HOT Lanes project.
 - Fairfax County Parkway extension through the EPG. Completion in 2011.
 - Woodrow Wilson Bridge reconstruction (including US-1 and Telegraph Road interchanges with I-495); under construction with completion date in 2011.
 - Section 3.2.1.2 outlines vehicle miles traveled expectations for the Mark Center and Victory Center sites. It is not practical for the Army to assume the Alexandria alternatives have the same projected amount of travel as what was approved in the past by the Alexandria City Council. The EA fails to identify the types of trips or fails to identify the traffic forecasts used to compare with the Metropolitan Washington Council of Governments (MWCOG) travel demand model.
 - There is no indication that induced travel arising from BRAC 133 was considered. The Army must factor induced travel demand effects in the decision-making process. The failure to recognize this will result in an underestimation of vehicle miles traveled (VMT) in the region, the underestimation of the benefits of efficient and convenient transit access, and, consequently, the failure to accurately estimate long-term effects of vehicle emissions for the environmental impact comparison purposes. Investments with significant transportation impacts should drive towards a preferred future, not simply the forecast future.

- As part of the environmental analysis at Section 3.3.2 the EA notes a decrease in both the number of vehicles and subsequently the total VMT within the National Capital AQCR. Assuming the net employee reduction figure is reasonable, it is hard to imagine the basis of the lowered VMT assumption given the lack of other travel mode considerations. The current WHS locations are generally in transit (bus, Metrorail and commuter rail) accessible locations; the Mark Center and Victory Center sites do not have comparable transit access. VMT would likely increase as a result.
- Vehicular Access – Section 3.2.5 focuses on site access to the GSA site while not acknowledging the benefits of being located adjacent to both I-95 and the Franconia-Springfield Parkway, both of which are major north-south and east-west routes; and in close proximity to the Fairfax County Parkway – an advantage not shared at the Mark Center or Victory Center sites. Close proximity to major access routes will allow for more convenient carpooling opportunities for WHS employees unable to use traditional transit services.
- The EA at Section 3.2.1.1 incorrectly states that Table 3.2-1 estimates “BRAC 133 peak hour trip generation with Transportation Management Program.” The table actually reflects the Estimated Net Increase in Peak Hour Trip Generation with TMP. The table provides an imbalanced comparison of net increase in peak hour trip generation with TMP favoring the Mark Center and Victory Center alternatives over the GSA site alternative by crediting employees and trips associated with previously approved development plans. The results are biased in favor of the Mark Center and Victory Center sites even if necessary infrastructure improvements are neither in place nor indicated. The EA does not consider GSA site redevelopment plans or transportation improvements that could be made by the Virginia Department of Transportation (VDOT) or Fairfax County near the GSA site.
- Travel Analysis – Additional traffic analysis should be performed prior to site selection for the Mark Center and Victory Center sites. Traffic analyses completed by the site developers only analyze the road network adjacent to each site. A more regional in nature analysis should be completed to properly gauge impacts and identify and estimate the cost of potential mitigation measures. At Section 3.2.1.2 of the EA it should be noted that trips destined to the Alexandria sites would be of a longer duration rather than “generally the same [duration].” This would become especially true over time as travel is estimated to be originating from points to the south and west, as noted in the analysis.

Transit

- Transit facility and service access must be considered to a greater extent than that indicated in the EA. This is especially true given the Army’s aggressive 40 percent trip reduction goal. The Federal Government’s participation in transit fare subsidy programs, such as SmartBenefits® and Metrochek, encourages transit use and vanpooling.
- The GSA warehouse site is the closest of all sites (including Main Post and the EPG) to Metrorail and Virginia Railway Express (VRE) station platforms.

Located approximately 1,900 feet from the Joe Alexander Transportation Center, the GSA warehouse site is well within walking distance of the Franconia-Springfield Metrorail and VRE station and connections to Metrobus, Potomac and Rappahannock Transportation Commission (PRTC), and Fairfax Connector bus service. PRTC commuter buses provide frequent access to and from Prince William County to the south of all three sites. Close access to PRTC commuter service should be considered to assist in achieving the 40 percent trip reduction goal since the majority of employees, over time, are expected to travel from points south.

- At Section 3.2.1.2, the EA indicates Metrorail use is expected to be limited by the fact that WHS employee residences are not located to a great extent within one mile of Metrorail stations. Fairfax County's experience is that end-of-the-line stations tend to draw from a much wider geographic range than the one mile suggested in the EA. The EA should identify the source of the information and systems studied. A greater percentage of WHS employees could use Metrorail for their work commute than assumed in the EA.
- Section 3.2.5 notes that shuttle bus service will be provided between the Mark Center site and several Metrorail stations while Section 4.1.1.2 indicates the Army would seek to secure shuttle bus service from the Mark Center. The effect on existing shuttle service and resources needed to operate and maintain shuttle service to the extent necessary to assist in achieving a 40 percent trip reduction is not identified. The cost of shuttle operations should be considered at the Mark Center and identified. If the Mark Center is transferred to Army control, the Army would be responsible for ensuring continued shuttle operations. Fairfax County's experience has been that Arlington County (where Metrorail connections could be made) has been, and is, very strict in enforcing the use of bus stop bays by buses to whose operator the bays are assigned. Bus congestion near Metrorail stations should be studied further prior to site selection.

Transportation - Non-Motorized

- The GSA site should ensure a good pedestrian and bicycle connection with the Metro station and that any sections of trails that may be shown on Fairfax County's Trails Plan are constructed and tied into trails system, particularly those trails that would connect into the METRO station.
- Page 3-114 notes that all alternatives should incorporate pedestrian and bicycle facilities, however the report should include a more thorough review of existing facilities in the analysis, and figure 3-22 should note cost to implement necessary pedestrian and bicycle facilities.

Air Quality

- The EA fails to evaluate adequately the air quality impacts that would be associated with each of the alternatives, particularly as they relate to emissions of ozone precursors but also in regard to fine particulate matter. Pages 3-51, 3-53 and 3-54 state that "a regional decrease in both the number of vehicles and

subsequently the total vehicle miles traveled within the National Capital AQCR would occur.” This may be related to claims made in the Environmental Impact Statement for the BRAC actions that there would be a net reduction of 1,700 employees from the region as a result of BRAC actions and that this reduction would result in an air quality benefit. As we noted in our comments on the Draft EIS, we feel that, even if overall VMT was reduced (and we do not feel that this conclusion has been substantiated), this reduction would not necessarily result in decreased emissions of ozone precursors if traffic congestion would increase as a result of the BRAC relocations—VMT is not the sole determinant of pollutant emissions, and traffic congestion can significantly increase such emissions. Further, proximity to efficient and convenient transit service is an important and cost-effective method to help reduce both VMT and traffic congestion, and an alternative that facilitates the use of transit (e.g., use of Metrorail and VRE) would probably be preferable from an air quality standpoint to an alternative for which transit use may be difficult. We feel that the GSA site would be particularly advantageous in this regard and question why there has not been at least a qualitative comparison of the alternatives. Ideally, a mobile source emissions analysis should be performed for each alternative to compare transportation-related emissions associated with trips to and from the BRAC 133 activities. The EA falls short in addressing air quality issues.

- Pages 3-55 and 3-56 of the EA outline a series of air quality mitigation measures that would apply to the GSA site, including limitations on construction on Code Orange, Red and Purple ozone days. These measures are detailed in Appendix E.5 of the EA (Final Construction Performance Plan for the Reduction of Air Emissions). No mitigation measures are proposed for the other two sites, because the other sites were not covered by the Draft General Conformity Determination associated with the BRAC EIS and because emissions associated with these sites are assumed to be below de minimus thresholds. Since all the mitigation measures address construction-stage impacts, since construction would be needed at any of the three sites, since, based on a review of Tables 3.3-2, 3.3-7, and 3.3-9, it is clear that construction-related emissions for the Victory Center and Mark Center sites would at least be comparable to those identified for the GSA site, and since ozone is a regional issue, it is unclear why the mitigation measures would be appropriate for one site but not the others, even if the Army is not technically required to pursue these efforts. The mitigation measures outlined for the GSA site should be pursued at any of the candidate sites.
- Recognizing that the list of air quality mitigation measures that are detailed in Appendix E.5 of the EA (Final Construction Performance Plan for the Reduction of Air Emissions) was developed through negotiations with the Virginia Department of Environmental Quality during the General Conformity Determination process, consideration should be given as to whether any of these efforts can be strengthened without jeopardizing timely project completion. Could the measures identified for implementation on Code Red and Code Purple days (no operation of diesel powered construction equipment of 60 HP and above) be extended to some or all Code Orange days? Could the limitations on the number of days for which the measures would apply be removed (e.g., the

restriction of the Code Red/Code Purple measures to two days per year; the possible restriction of Code Orange measures to three consecutive days and ten total days per year; the restriction of measures to the June 1 – August 31 period)?

Biological Resources

- The EA notes that the GSA and Victory Center sites have been developed and that little in the way of ecological resources remain on either site. The Mark Center site is adjacent to the Winkler Botanical Preserve. While it is recognized that this preserve is surrounded by relatively high intensity suburban development (including one building in the Mark Center development that has been constructed near the boundary of the preserve) and an interstate highway, and while it is recognized that if the Army chooses another site for WHS, the Mark Center site will be developed by another entity at some time in the future, it should also be recognized that development on the Mark Center site could result in clearing of forested areas immediately adjacent to the preserve and would likely result in increased stormwater runoff volumes and velocities, particularly if on-site controls were not provided. These increased runoff volumes and velocities could adversely affect the streams and the pond within the preserve. We recommend that, if development is pursued at the Mark Center site, the Army work closely with the City of Alexandria and the Winkler Botanical Preserve to minimize and mitigate for these impacts. The Army could design the development in a manner that maximizes retention of forested areas adjacent to the preserve and could provide on-site stormwater management controls (perhaps beyond what would be required) to reduce adverse impacts in downstream areas.

Water Resource/Stormwater Management/Water Quality Controls

- No specific stormwater management features have been described in the EA, therefore the County is not able to provide specific comments.
- The EA alludes to the pursuit of “LID practices where possible” as a BMP. Consistent with the LID concept (replication of natural hydrologic conditions through reduced impervious cover and through infiltration of stormwater runoff), efforts should be pursued to design the facility and parking structure such that their development footprints and associated impervious areas will be minimized.
- We recommend that Fort Belvoir pursue stormwater management retrofitting of existing developed areas that have not been controlled to date. As there are no stormwater management facilities currently located on the GSA site, the redevelopment of the GSA site would afford substantial opportunities to improve stormwater runoff conditions, and efforts should be taken to optimize on-site stormwater management and water quality BMPs, consistent with the required level of development. Page 3-69 of the EA notes that Fort Belvoir’s MS4 permit “requires that the installation’s storm drainage design comply with Fairfax County storm water management criteria.” Efforts beyond minimum county requirements for stormwater management and water quality control should be pursued, as these requirements are not stringent as they relate to redevelopment of a highly

impermeable site. The county's Comprehensive Plan recommends that stormwater management and water quality controls be optimized for redevelopment, and we recommend that this approach be taken here in light of substantial opportunities to improve downstream conditions through on-site controls. Coordination with the Stormwater Planning Division of the Department of Public Works and Environmental Services (703-324-5500) on stormwater management strategies is recommended. In addition, as a courtesy, the Stormwater Planning Division should be provided with stormwater management plans when these plans are available in order to afford an opportunity for the Division to review detailed stormwater management concepts and suggest approaches for improvement.

- As any new construction by the Army will be built to the LEED Silver standard, as described in the Final Environmental Impact Statement for Implementation of the 2005 BRAC Recommendations, we again encourage the Army to pursue higher levels of stormwater management and water quality controls for redevelopment than the minimum requirements.
- As the percent impervious cover of a parcel increases, the resultant increase in stormwater runoff commonly degrades the biotic and abiotic integrity of those waterways downstream. Since the GSA site is almost entirely covered by impervious surfaces, it can be assumed that stormwater runoff from this site is negatively affecting Long Branch tributary and the Accotink Creek watershed. This can be reduced through various land management practices such as, but not limited to, maintaining or returning to pre-development hydrologic conditions, green infrastructure and best management practices. Downstream conditions should be considered in the development of a stormwater management strategy/concept for the GSA site. Coordination with the Stormwater Planning Division is recommended.
- The Accotink Creek watershed presents a challenge in management as the entire watershed is classified as Watershed Restoration Level II Area under the Fairfax County 2001 Stream Protection Study baseline report. The portion of Long Branch tributary that surrounds the GSA to the north and south have been classified as "good" regarding the habitat condition in the 2003 Stream Physical Assessment. Any redevelopment in watershed should be designed and constructed so as to prevent any additional stormwater and water quality impacts to Accotink Creek and preserve the quality of the habitat surrounding the GSA site.
- Per the Virginia Erosion and Sediment Control Regulations (4VAESO.30-40.19) and SWM Regulation (AVAC3.20.81), ensure that downstream channels and properties be protected from erosion and damage due to increases in volume, velocity and peak flow.
- Pursuant to the RPA requirements of the county's Chesapeake Bay Preservation Ordinance, streams with perennial flow are to have 100 foot (or greater) undisturbed buffer along both sides.
- We encourage the Army to send a representative to sit on the Watershed Advisory Group for the Accotink Creek Watershed Management Plan. We expect to begin the public involvement piece of this plan in the late summer to early fall of 2008.

More information on this plan can be found at www.fairfaxcounty.gov/dpwes/watersheds. Participation in planning efforts for other watersheds on Fort Belvoir (Dogue Creek; Pohick Creek) is also recommended.

- We encourage the army to discuss their role in the TMDLs that are being developed for Accotink Creek. As listed on Virginia's 2006 303(d) list of impaired waters, the portion of Accotink Creek downstream of Long Branch is listed as impaired for aquatic life use impairments (benthic macroinvertebrate) and recreational contact impairments (fecal coliform).
- Hay bales are identified as a potential erosion and sediment control measure (see page 3-116). Please note that the circumstances under which hay bales can be used as an erosion and sediment control technique are limited in Fairfax County; they can only be used for sheet flow application. It is recommended that the use of hay bales not be pursued, as there are other more effective approaches.

Schools

Fairfax County Public School (FCPS) will provide detailed comments on the BRAC 133 directly to the Army. The following highlight some of the FCPS's major concerns:

- FCPS questions the methodology and assumptions used to produce an estimate of only 266 additional students to the County's public school system. School planning staff believes that even the original estimate of over 3,200 additional students was flawed. It included an assumption that approximately 20% of school-aged children whose families come to live in Fairfax County would educate those children outside of FCPS. Actual experience in Fairfax County is that only about 9 percent of students are educated in private or parochial schools, or are home schooled. We also dispute the assumptions used to determine the percentage of families that would relocate to Fairfax County. Because of the high quality of services in Fairfax County, to include a nationally recognized school system, we believe that a larger proportion of relocated or new employees will choose to live in Fairfax County than was initially modeled in the EIS process.
- The original FEIS included the presumption that the impacts to FCPS will be small compared with the total membership. We believe that the impacts are likely to be uneven and are likely to be more concentrated in areas nearer Fort Belvoir. Given that, student increases due to BRAC 2005 could easily push enrollment beyond capacity at some schools thus potentially requiring capital project investments by the school system.
- Neither the FEIS nor this EA included an analysis of induced and indirect jobs (sometimes called spin-off jobs) in addition to the 19,300 federal jobs to be moved. The additional student impact that would result from the indirect and induced jobs as a result of the 2005 BRAC decision regarding Fort Belvoir could be, at minimum, a factor of two larger than the impact from the direct movement of personnel. To the extent reasonable and possible, the original EIS should have provided a rational accounting of spin-off jobs, especially in cases where existing

direct contractors to the Department of Defense (DOD) and the U.S. Army are known or anticipated.

- The General Accountability Office (GAO) Report (GAO-08-665), dated June 2008 and titled “Defense Infrastructure: High Level Leadership Needed to Help Communities Address Challenges Caused by DOD-Related Growth” cited DOD Directive 5410.12 which requires that the U.S. Army and the other military branches provide to local communities and governments detailed information to assist in determining and planning for impacts to local governments, services and communities, as a result of BRAC decisions. The GAO Report states that the U.S. Army has a centralized database containing data about personnel movements that could prove to be helpful to school systems such as FCPS in assessing the impact of the latest BRAC decisions. The GAO report also echoes our school system’s repeated concern that indirect and induced job impacts should have been, but were not, addressed in the BRAC 2005 EIS process.
- Fairfax County Public Schools comments regarding the EA and the previously estimated school impact:
 - The draft Finding of No Significant Impact appears to be based on the lower school impact assessment contained in EA 133. Regardless, FCPS requests all references to the later and informal estimates of total impact cited, which were not previously contained in the body of the FEIS and ROD, be removed from the EA.
 - A more complete analysis of impact should be undertaken that would include consideration of spin-off jobs in addition to the direct impact of personnel movements due to BRAC 2005 directly affecting Fort Belvoir, of which the personnel changes identified in the draft EA are but a subset.
 - All data or information from the DOD Directive 5410.12 should be provided to FCPS in a reasonable and agreed to electronic format with documentation identifying the contents and its limitations.

Cultural and Resources

- There are no known sensitive cultural resources at the GSA site which is consistent with page ES-3, Final EA BRAC Recommendation 133, and with the finding of the Virginia Department of Historic Resources staff as stipulated in Appendix B.2 of "No Historic Properties Affected" for above grade heritage resources.

Emergency Services

- The report, section 3.9.1.1.2 Quality of Life, highlights the number of services available in the ROI for Law Enforcement, Fire Protection and Medical Services. The report is limited in this area and mainly focuses on the number of available law enforcement personnel in the ROI to include federal resources, which totals over 12,000 law enforcement employees.
 - The report doesn't specifically address demands placed on public safety due to increases in calls for service. The Fairfax County Police

Department will need to review and plan for any increases in Calls for Police Service in the area and increase staffing / facilities or equipment accordingly as well as complete a review of all applicable MOUs. These and other recommendations were detailed in the Police Department's 2007 "Detailed Comments Report" to specific sections of the Draft Environmental Impact Statement (EIS) for the Base Realignment and Closure (BRAC).

- Section 3.9 Socioeconomics for the GSA Site, under Quality of Life 3.9.1.1.2, the report states that the closest station to the GSA site is Fairfax County Fire Department's Springfield Station 422. The report also states that the GSA site is in a jurisdiction that is part of the Northern Virginia Emergency Services Mutual Response Agreement which is a memorandum of agreement among Northern Virginia jurisdictions to provide automatic mutual response of fire, rescue and emergency services.
 - If the GSA site is selected to relocate the 6,409 personnel under BRAC 133, the Fairfax County Fire and Rescue Station 22 located at 7911 Backlick Road in Springfield, VA could accommodate the potential increase of emergency service calls in conjunction with the automatic mutual response agreement that exists between Fort Belvoir and the Northern Virginia jurisdictions. The Fairfax County Fire and Rescue Department will need to continue to monitor and analyze the potential increase of emergency service calls related to future growth and development that may occur in the surrounding areas of both the Engineer Proving Ground (EPG) and the GSA site as a direct result of relocating over 19,000 personnel via the BRAC.
- More detailed information is needed regarding the U.S. Army's plans for the construction of an Emergency Services Center (ESC) and the possible Fire/EMS station to be located at the EPG. Specifically, the location of the additional Fire/EMS station and the specific emergency services, apparatus, and staffing that are planned for the ESC and the new Fire/EMS station if constructed.

Noise Impacts

- Section 3.4 notes the lack of several noise sensitive uses (hospitals, schools and churches) near the GSA site but does not address proximity to residences. The Loisdale Estates subdivision is located to the south of the GSA property but will not be immediately adjacent to the area of the property that would be subject to construction. Residential development is located to the immediate north of the site and would be affected by construction noise and any other noise that may be generated on the site. The proposed best management practice to limit construction to normal weekday business hours is therefore appropriate and should be enforced.
- Page ES-5 states: "Long-term negligible adverse noise effects could occur due to noise from continued operational and remote inspection facility (RIF) activities . . ." The site should be designed such that noise-generating activities will be situated away from nearby residential areas.

- Table 3.14-1 identifies maintenance of vegetated buffers for noise attenuation as a best management practice. The retention and planting of such buffers should be supported, particularly for visual/aesthetic purposes, recognizing that narrow buffers will probably not have a significant mitigating impact on noise.

Hazardous Materials

- A best management practice identified for the GSA site is: “Conduct testing for petroleum and PCBs in soils and groundwater, and asbestos, LBP [lead-based paint], and PCBs in structures, before construction activities begin, and address the presence of these contaminants in accordance with applicable local, state, and federal regulatory requirements.” Coordination with the county’s Health Department and Fire and Rescue Department is recommended on all site investigation and cleanup activities

Housing

- Section 3.13.3.9 appears slanted against the GSA site with regard to revitalization and redevelopment in Springfield, noting “housing price increases in the immediate [Springfield] vicinity, which could adversely affect low-income residents.” There is no similar statement with regard to potential revitalization or redevelopment near the Mark Center or Victory Center sites. It would be more accurate to indicate that although housing price increases could adversely affect low-income residents near all three sites, overall, revitalization results in positive economic and social benefits.

Public Utilities

Fairfax County Water which would provide public water for the GSA site has provided the following comments:

- Fairfax Water provides the General Service Administration (GSA) Warehouse with potable water via a 12-inch main line on Loisdale Road that is supplied by a nearby 30-inch transmission main. The current configuration is adequate to satisfy water demands and fire flow requirements associated with the BRAC 133 alternative to relocate 6,409 employees to a redeveloped GSA site.
- Fairfax Water routinely samples water quality at a site near the GSA Warehouse-issues concerning unsafe levels of lead, iron, and chlorine and coliform bacteria are not associated with Fairfax Water’s distribution system. On-site improvements to the distribution system are suggested to eliminate the elevated levels of iron and lead that are recorded for the year 2000.
- Access to public water for the GSA 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 using the internet at www.fairfaxwater.org.

- Fairfax Water will own, operate, and maintain all water system infrastructure necessary to serve any proposed new development at the GSA site.
- Prior to construction, site plans for GSA shall be submitted to Fairfax Water and the Fairfax County Fire Prevention Division for review and approval. Minimum submittal requirements include (Fairfax Water can provide more detail on the specific requirements to includes in each of these plans prior to submission):
 - Preliminary Site Plan
 - Final Site Plan
 - Easement Plan