County of Fairfax, Virginia

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

March 23, 2010

Mr. Bill Sanders
Director of Public Works
U.S. Army Garrison, Fort Belvoir
9430 Jackson Loop, Suite 100
Fort Belvoir, VA 22060-5116

Reference: Final Environmental Assessment and Draft Finding of No Significant Impact for 2005 Base Realignment and Closure (BRAC) Recommendation 5 and 132 at Fort Belvoir, Virginia

Dear Mr. Sanders:

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 5 and 132 at Fort Belvoir, Virginia.

It should be noted that upon review by Fairfax County, of the three locations, proposed alternatives B or C are the County's preferred location. This location for BRAC 5 and 132 would provide a better opportunity to minimize impacts to the environment, including impacts relating to land disturbance, wildlife habitats, sensitive resource areas, and cultural resources. We believe that alternatives B or C to minimize environmental impacts in a way that is not possible with any of the other sites under consideration.

Our detailed comments on the above referenced documents are attached. Thank you for your attention and consideration of our comments. If you need additional assistance please contact me at (703) 877-5688.

Sincerely,

Mark G. Canale
Fairfax County BRAC Coordinator

MGC/slc
Attachments: As Stated

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2005 Base Realignment and closure (BRAC) Recommendations 5 and 132
Comments from Fairfax County, Virginia
March 23, 2010

Land Use and Compatibility

- Fairfax County recommends the adoption of Alternatives B or C as outlined in the Environmental Assessment for the project. As stated is section 5.6 Cumulative Effects Summary of the Environmental Assessment, "Though the cumulative impacts associated with Alternatives A and B would be minor or negligible, Alternative A would have the greatest impact because it would result in the most new construction activity…." Alternative A would include the use of site 6 at Davidson Army Airfield (DAAF) which requires the clearing of 7.5 acres of forest, and the use of long term parking of RVs and equipment along Poe Road at site 10 which would require improvements to the internal road to the old landfill site and to the associated bridge across Accotink Creek. For those reasons, the County recommends that Alternative A as proposed not be adopted.
- *Figure 4-1, Land Use Categories, p.4-2:* The map shown in Figure 4-1 is not the same as the map provided in the Final EIS for Implementation of the 2005 BRAC Recommendations at Fort Belvoir dated June 2007 (Figure 2-2 Proposed Land Use Plan). The Record of Decision for that document indicates that was to be the updated land use plan for the installation's Real Property Master Plan (RPMP), which was also to be updated. The text in section 4.2.1 makes reference to a RPMP Long Range Component dated December 2009. At what point was a new RPMP completed? Fairfax County has not been given an opportunity to review and comment on any changes to the RPMP components. It would seem appropriate for the RPMP to be finalized with proper NEPA review and adoption before decisions are based on its contents.

Water Resources/Stormwater Management

- Overall, the EA seems to lack the specificity and detailed information required to make an informed decision regarding certain elements of the report. The figures within the report note a number of features for which there is no definition or specific description provided within the report. The terms, riparian buffer, Resource Protection Area (RPA) and installation boundary are noted in the legend for each of the figures, yet no definition or further explanation of these terms is provided anywhere within the report.
- The term, riparian buffer is clearly an indication of a protected area adjacent to a given water body. However, it's not clear what basis was used when applying this element. Is it applied to all water bodies? Only perennial water ways? Can it be applied to intermittent or ephemeral stream channels? While the riparian buffer appears to extend approximately fifty-feet on either side of the stream channels, it is not clearly indicated why this distance was chosen.

- The term, Resource Protection Area (RPA) is a buffer area designated within the Chesapeake Bay Preservation Ordinance (CBPO) for Fairfax County. However, while it appears on every figure with the report there is no definition or explanation of this term or how it is applied to the figures. RPA's are intended to vegetated, undisturbed buffer areas adjacent to any water body or perennial stream channel.
- The term, installation boundary is noted within the legend for each of the figures. It is not clear how this term is used as it relates to the proposed development noted for each figure. If it is intended to define the limits of disturbance or clearing and grading for each area, then there are several sites where the installation boundary is noted as extending into the RPA. If this is truly the case, then the report findings cannot conclude that the proposed work will result in a Finding of No Significant Impact (FONSI). The RPA is intended to be an undisturbed buffer for perennial waters. Therefore, if the limits of disturbance extend into this area, then it is no longer undisturbed.
- Figure 2-3, depicts the RV and RCI Lots. While there does not appear to be any RPA in the area of the proposed work, there is an area noted as ***Temporary Building, 2-story – 14,400 SF*** which presents some concerns. There is a small stream channel noted in this area which has a designated riparian buffer. The installation area of this proposed building clearly encroaches into this riparian buffer. It appears that there might be an opportunity to move this structure to a location which would not compromise this riparian buffer.
- Figure 2-7, depicts the proposed work area for the Davison Airfield site. The installation boundary for this site clearly extends into the RPA. If the CBPO were clearly understood, then there would be no land disturbance in this area for the proposed building. The only possible exceptions to this would be a connection to an underground sanitary sewer service line via a narrow corridor, or possibly an outfall for storm drainage from an above-ground or below ground detention facility.
- The terms such as RPA, installation boundary should be defined somewhere within the report. If the proposed intrusions into these areas are to remain, then additional information should be provided as to why they are essential to the design of each of these areas. If they are to remain, then the FONSI designation for this report may not be appropriate.
- Fairfax County recommends that the Army adopt measures to protect water quality as generally discussed in section 4.7.3 Best Management Practices and Mitigation of the Environmental Assessment.
- However, the findings that there will be no significant impact on water resources ignore the fact that existing conditions off of many of the areas proposed for utilization are poor in terms of previous and continuing erosion and lack of surface water detention or treatment. For example, site 2, the RCI Lot drains directly to the west into a ravine that flows to critical wetland habitat in Accotink Bay which is contained within the Accotink Bay National Wildlife Refuge.
- Since this "temporary" building situation will involve construction of building footings and piers, running of utilities and renovation of existing and placement of

new impervious surfaces, the Army should take measures to treat stormwater from any new impervious surfaces, and to reduce the impacts of runoff to surface waters, soils and wetlands from existing impervious surface areas. This should include permanent BMPs and stormwater facilities to the greatest extent possible such as bioswales or rain gardens around and within parking areas, cisterns or planter boxes to capture roof run-off, improvement of vegetation in already disturbed off-site areas that could act as improved filters, etc. Other potentially appropriate measures are discussed in section 4.7.3.

- If Alternative A were adopted, and the sites 6 (DAAF) and 10 (Poe Road) utilized, efforts should be made to employ stormwater management features that are structural and non-structural to address any new impacts. This would be especially important at site 6 (DAAF) where 7.5 acres of trees would be cleared adjacent to a drainage that flows directly to the main stem of Accotink Creek. The DAAF site seems to have great potential for stormwater detention if this site is used.

Biological Resources

- As stated above, due to the greater amount of site clearing and the location of several additional areas of proposed impact (particularly sites 6 and 10) adjacent to sensitive resource areas, Fairfax County strongly recommends that Alternative A not be adopted. As stated in the Environmental Assessment in the Wildlife section, "Wildlife using the DAAF site could include numerous species of birds, mammals, and other animals, because the site is part of a large natural area surrounded by developed land. The Southwest Area of Fort Belvoir, where Poe Road is located, provides important wildlife habitat in a mostly urbanized area."
- The County recommends that all measures outlined in section 4.8.3 Best Management Practices and Mitigation of the Environmental Assessment be employed to minimize impacts to biological resources.
- As stated in the Environmental Assessment section 5.2.7 Biological Resources, "Long-term minor adverse effects on vegetation and wildlife would result from the loss of trees on the AMC, Lewis West, and Town Center sites, and from the reduction in wooded area at the DAAF site." The DAAF site (site 6) is completely wooded. Although two sides of the site are bordered by Santjer Road, the site is close to the Accotink Creek floodplain and the overlay area identified by the Virginia Natural Heritage program as containing important wetland habitats. Although the DAAF site itself may not contain such habitats, it functions as a buffer for those areas that do and likely provides important supporting habitat. As opposed to the statement in the Environmental Assessment that wooded areas around the DAAF and Poe Road sites likely only support urban adapted wildlife, proximity to the Accotink Bay National Wildlife Refuge and the lower Accotink Creek corridor make it very possible that that western portion of Ft. Belvoir supports non-urban adapted species that are far more sensitive to land disturbance and human activity.
- The forest stand on the DAAF site is mixed forest stand with pines along the drainage to the southwest and hardwoods with pines on site. The land was clear in

1937 and largely clear in 1953. The forest stand age is likely 40-60 years. Soil intactness is unknown.

- There are no known sensitive species, however, the mid-succession forest type contained on site may be suitable for small whorled pagonia and is generally suitable for orchid species.
- Given the site condition and the potential for sensitive species on both the DAAF site in particular and the Poe Road area, any use of those areas should involve site surveys with close coordination with the USDA Fish and Wildlife Service, Virginia Department of Game and Inland Fisheries (VDGIF) and the Virginia Department of Conservation and Recreation (VDCR) Natural Heritage Program particularly for those species identified in section 4.8.1.3 Sensitive Species of the Environmental Assessment and in the letters and emails from VDCR and VDGIF in Appendix B of the Environmental Assessment, but also for any other species identified particularly vegetative species such as those mentioned above.
- Because of potential impacts to sensitive species but also due to the long term impacts of land clearing and increased human activity, the County strongly recommends that no use be made of sites 6 and 10 as outlined in the Environmental Assessment.

Affected Environment and Consequences

- *Section 4.2.3, Best Management Practices and Mitigation* Given the temporary nature of these building locations, is there any consideration given to restoring these sites once personnel are moved to permanent locations? Removal of impervious parking surfaces and restoration of vegetation is strongly encouraged to mitigate longer then necessary impacts.
- *Section 4.12, "Utilities":* This section discusses solid waste disposal, along with other utilities. Table 4.12-1 shows an estimate of the amount of waste to be generated, along with waste to be recycled. No mention of recycling is included in the Best Practices and Mitigation Strategies (4.12.3). Could this be added, along with a plan for how the project will achieve a 50% recycling rate? In addition, will a recycling program be implemented in the buildings once constructed, to continue recycling strategies once the buildings are occupied? After personnel move into their permanent locations, will the temporary structures be reused elsewhere or added to landfills? The entire life cycle of the buildings to be constructed should be considered as it relates to amount of waste generated, since they are considered temporary buildings and may be disposed of in a few years.

Cultural Resources

- The proposed action Alternative A in the Final EA is not in keeping with the Woodlawn Historic District Viewshed Study 95% Draft for the Lewis West site,

dated September 2009. The chart on page ES-3 of the EA indicates short-term minor adverse effects on cultural resources. However, the text on page ES-4 under "*Long-term minor adverse* effects" indicates that wooded areas at the Lewis West site would require clearing in order to install a relocatable building. Page 2-9, 2.2.1.4 Lewis West Site indicates the site requires extensive preparation.

- The viewshed study was conducted with a certain amount of vegetative buffering already in place, and balloon tests for the Lewis West area (Balloon #3) were conducted for the location of the CDC, which is north of the Lewis West site. The Lewis West site is much closer to the Woodlawn Historic District than the area reviewed under the viewshed study. According to the viewshed study draft, the specific recommendation for the Woodlawn Quaker Meetinghouse for Balloon #3 is to:

  > Enhance the treeline on the east side of Franklin Street with large evergreen trees in the middle-ground, interspersed with the existing deciduous trees in the foreground. (Woodlawn Viewshed Study 95% Draft Report, p. 4, Specific Recommendations)

- The site plan for Lewis West on page 2-10 of the EA does not reflect the amount of vegetative buffering recommended in the viewshed study draft. This buffering was recommended for the CDC, and the Lewis West site being closer to the Friends Meetinghouse will have a more detrimental impact. In addition, the EA page 5-6, 5.2.8 Cultural Resources, second paragraph indicates "vegetative screening and visual buffers between the proposed sites and historic properties would be maintained…"
- Section 4.3 of the EA indicates that the Lewis West site has been determined not to contribute to the historic viewshed of the Woodlawn Historic District. However, the viewshed study draft specific recommendations indicated a buffer would not only be preserved but enhanced. Development of the site should adhere to these recommendations.
- Cultural Resource maps must be included in the EA beginning on page 4 - 29. The text refers often to distances from the Belvoir district and/ or the Woodlawn eligible district for evaluation of effect of the alternatives. Graphic depictions will be useful tools needed to illustrate this, to show district boundaries. Many references to tree line buffers should also be shown graphically.
- Davison Army Airfield, page 4-31, Eligibility is still under review. What will happen if the area is determined the airfield is eligible for the National Register of Historic Places (NRHP)? Also on page 4-33, it states that if the DAAF Area is determined to be eligible, the location for the relocatable buildings would not cause an impact because it is not contiguous with the potentially eligible structures. Please provide a graphic to show the relationship.
- Secondary site, 4.9.1.3 page 4-32: Has survey/evaluation been done in area off Belvoir to determine if potential resources and if there is an effect? There may well be sufficient tree buffer, but where this has been addressed?

Transportation

- Is the parking provided on-site structured or surface lots? Also, the location of vanpool, car pool parking, accessibility to transit/bus service need to be addressed. How will construction contractor parking be coordinated? In addition, construction hours of operations, impacts to noise, traffic and air quality need to be investigated.
- Looking at the numbers provided in the EA, it appears that surface parking is being used exclusively, with 1,868 parking spaces for 2,786 employees in the temporary buildings under Alternative A. As for the remaining 547 employees, would they be located in existing buildings and use existing parking?
- Fairfax County doesn't concur with the notation in Section 4.11 – Transportation, on pages 4-41 through 4-47 that having as many as 2,000 additional personnel co-located for six months during the transition of new and old personnel onto and off the installation will have no significant impact on existing and forecast traffic volumes. This is particularly true given the apparent selection of Alternative A that requires additional construction workers and related traffic for the implementation of 460,000 SF of "relocatable" buildings and renovation of 19 existing buildings on the installation during the ongoing Main Post Infrastructure and Community Hospital construction projects. Also, it is not stated when the six-month transition period will occur, but assuming it is in the months leading up to September 2011, it would be impacting the roadway network and transit system during portions of the region's peak tourist seasons. This could further compound traffic operations in the area. Perhaps interim improvements need to be proposed to address these short term impacts, especially at the gates.
- *Section 4.14, Cumulative Effects:* Has the number of construction workers for each project taking place on Fort Belvoir been determined? A combination of construction/delivery vehicles and construction workers arriving and departing each day could have a significant impact on both on-post and off-post road network over the next two years. This should be included in determining the impact of the alternatives.

Transit

- BRAC 5 and BRAC 132 activities on South Post will very likely have a significant negative impact on the ability of the WMATA-operated REX (Richmond Highway Express) and Fairfax Connector bus services. An increase in construction or personnel related vehicular traffic at the Pence and/or Tulley gates will have an impact on the performance of both the REX and Connector buses. For the Fairfax Connector, if traffic at either of the gates backs up onto Route 1, it will affect the on-time performance of route 171 particularly during the peak periods in the peak-flow direction of travel. The REX bus, since it goes onto the post, will have additional on-time performance issues with an increase in vehicular traffic.

Comments/Corrections

- Page 4-16 first bullet at the bottom of the page should be "predominantly" not "predominately"
- Page 4-33 Goethals Road: Change "not constitute an adverse effect" to "have no adverse effect"
- Page 4-33 Lewis West site, page 4-34 Town Center site, page 4-34 Town Center site, page 4-34 Tompkins Basin site and any other similar wording: "would not be expected to have an adverse effect" is vague. Either "no adverse effect"; "no effect" or "adverse effect". Otherwise, under what circumstances might it have an adverse effect?
- Page 4-33 DAAF site: Change to: "There would be no adverse effect to the airfield by a relocatable building. The DAAF site is not contiguous with potentially eligible structures. The DAAF site is on the eastern edge of the airfield at the southern end of the runway and is surrounded by woods."
- *Section 4.5, "Noise":* It would be helpful if a map of the NSA identified in Table 4.5-2 were shown so that the relationship to the proposed locations could be seen clearly.
- Page 4-30, 4.9.1.1. Primary Sites: Last word on page should read "Woodlawn" not "Woodland."
- Any references to the Woodlawn Viewshed Study should be to the 95% draft, as the final has not been completed to our knowledge. If the final Viewshed Study is completed we would like to receive a copy for our records.
- Page 2-9, 2.2.1.4 Lewis West site, 2nd paragraph. Factual error to correct: The Woodlawn Friends Meetinghouse is listed on the National Register. Remove the word eligible. All references in the EA should state the property is listed on the NR.