



GERALD E. CONNOLLY
CHAIRMAN

COMMONWEALTH OF VIRGINIA
COUNTY OF FAIRFAX
BOARD OF SUPERVISORS
FAIRFAX, VIRGINIA 22035

Suite 530
12000 GOVERNMENT CENTER PARKWAY
FAIRFAX, VIRGINIA 22035-0071

TELEPHONE 703- 324-2321
FAX 703- 324-3955

chairman@fairfaxcounty.gov

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

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.

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

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.
- 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.
- 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**

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.

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.

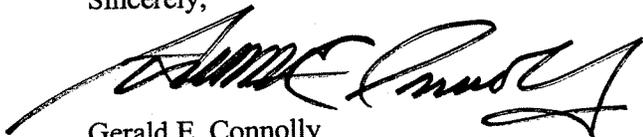
- G. The DEIS does not adequately examine impacts to existing public park and recreation levels of service; local-serving public parks in the Mount Vernon and Lee Districts are already deficient in their ability to provide athletic facilities, playgrounds and courts, and this shortfall will be aggravated 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.
- 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.

- 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.

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

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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