



August 7, 2008

MEMORANDUM

TO: Anthony H. Griffin
FROM: Jack D. Dale
SUBJECT: Final Environmental Assessment 133 and Draft Finding of No Significant Impact

In a letter to the previous Garrison Commander, Colonel Lauritzen, dated August 1, 2007, Fairfax County Public Schools (FCPS) took issue with the estimated impact upon Fairfax County Schools, as articulated in the Final Environmental Impact Statement (FEIS) related to the impact of personnel movement as part of the 2005 Base Realignment and Closure (BRAC) decisions. The Army's estimated increase of 3,258 students was described as having little or no significant impact to FCPS. We continue to dispute, for several reasons, both the size of the estimated impact and any finding that the impact will be insignificant.

FCPS is disappointed and even incredulous about the Army's revised estimate of 266 additional students as the total impact to FCPS system, as stated in EA 133. This lower student impact estimate was first stated following the Record of Decision (ROD) and was not part of the FEIS or the ROD related to Fort Belvoir as part of BRAC 2005. Thus, not only was the timing suspect but the methodology and assumptions used to produce the lower impact estimate have not been documented as part of the EIS process.

School planning staff also believe 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.

Finally, we make note that in neither the FEIS nor the EA were induced and indirect jobs (sometimes called spin-off jobs) modeled in the analysis. 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 has the following comments regarding the EA, in particular, and to the previously estimated school impact generally:

- 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.

On behalf of Fairfax County Public Schools and members of the Fairfax County School Board, I thank you for the opportunity to join our comments with those of other County agencies responding to EA 133. FCPS continues to encourage coordination with the Army's project consultants as the Fort Belvoir BRAC action is implemented. Our points of contact are Dean Tistadt, chief operating officer (703-246-6950), and Denise James, director, Office of Facilities Planning Services (703-246-6920). We look forward to continuing to work with the County in the effort to address BRAC impacts.

JDD/lms

cc: Dean. A. Tistadt, Chief Operating Officer, FCPS
Denise M. James, Director, Office of Facilities Planning Services