



COMMONWEALTH of VIRGINIA

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September 2, 2008

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

RE: Final Environmental Assessment and Federal Consistency Determination for the Implementation of the 2005 BRAC Recommendation 133, Washington Headquarters Services, Fort Belvoir, Fairfax County and City of Alexandria, (DEQ 08-154F).

Dear Sir/Madam:

The Commonwealth of Virginia has completed its review of the July 2008 Final Environmental Assessment and Federal Consistency Determination (FCD) (received July 14, 2008) for the above referenced project. The Department of Environmental Quality is responsible for coordinating Virginia's review of federal environmental documents and responding to appropriate federal officials on behalf of the Commonwealth. DEQ is also responsible for coordinating Virginia's review of federal consistency documents submitted pursuant to the Coastal Zone Management Act (CZMA) and providing the state's response. The following agencies and locality participated in the review of this proposal.

Department of Environmental Quality
Department of Conservation and Recreation
Department of Game and Inland Fisheries
Marine Resources Commission
Department of Health
Department of Historic Resources
Department of Transportation
Fairfax County
City of Alexandria

The Department of Mines, Minerals and Energy and the Northern Virginia Regional Commission were also invited to comment on the proposal.

Public notice of the proposed action was published on DEQ's web site from July 25, 2008 to August 12, 2008. No public comments were received in response to the notice.

PROJECT DESCRIPTION

The U.S. Army has submitted a Final Environmental Assessment (EA) and federal consistency determination (FCD) for the proposed relocation of 6,409 personnel associated with BRAC Commission Recommendation 133 to Fort Belvoir, Virginia. The various elements of BRAC 133, which consists of miscellaneous Department of Defense (DoD), Defense Agency, and Field Activities, are currently located in leased facilities within the National Capital Region. Relocation of BRAC 133 would require up to 1.8 million square feet of existing or newly-constructed administrative and specific-function space, and 1.3 million square feet of associated parking facilities. Three alternative sites for implementing the proposed action were considered and evaluated in detail in the EA. These alternatives are:

1. **GSA Site** (Alternative A)-acquisition, construction, and operation of administrative facilities at a warehouse site owned by the General Services Administration (GSA) in Springfield;
2. **Victory Center Site** (Alternative B)-acquisition and operation of administrative facilities at a privately owned office complex on Eisenhower Avenue in Alexandria; and
3. **Mark Center Site** (Alternative C)-acquisition and operation of administrative facilities at a privately owned office complex at the intersection of Seminary Road and Interstate 395 (I-395) in Alexandria.

Other alternatives included four additional sites that were assessed and ultimately rejected for not conforming to Army relocation criteria, and were therefore not evaluated in detail.

CONCLUSION

According to the DEQ Air Quality Division, activity at any one of these proposed sites may potentially have an effect on the area's ability to comply with the National Ambient Air Quality Standards. Accordingly, the air quality mitigation measures required under the *Final General Conformity Determination for Implementation of 2005 Base Realignment and Closure Recommendations and Related Army Actions at Fort Belvoir, Virginia* should apply to each of the proposed alternative sites.

Virginia's Secretary of Transportation, in a July 30, 2008 letter, indicated that the selection of the future location of the Washington Headquarters Services could have a profound impact on the Northern Virginia region. Although three potential sites (GSA

Warehouse, Victory Center and Mark Center) were analyzed in the EA, the Secretary understands that development sites at the Main Post and the Engineer Proving Grounds are still being considered for Washington Headquarters Services. The Office of the Secretary has deep concerns over the potential for relocating another 6,400 employees to the Main Post and Engineer Proving Grounds.

Traffic congestion and operational problems can be expected from development of any of the three alternatives unless substantial, regional roadway improvements are constructed. Furthermore, there is concern over whether any of the recommended road improvements would qualify under the Defense Access Road program. Of the three sites, the GSA and Victory Center sites are located near Metrorail and/or Virginia Railway Express stations and offer the most potential for reducing vehicular trips generated by the proposal.

From the perspective of wildlife and habitat protection, DGIF prefers development of the GSA or Victory Center over the Mark Center. In general, the Commonwealth of Virginia prefers alternatives that minimize impacts to air quality and promote the increased use of mass transit.

FEDERAL CONSISTENCY UNDER THE COASTAL ZONE MANAGEMENT ACT

Pursuant to the Coastal Zone Management Act of 1972, as amended, federal activities located inside or outside of Virginia's designated coastal management area that can have reasonably foreseeable effects on coastal resources or coastal uses must, to the maximum extent practicable, be implemented in a manner consistent with the Virginia Coastal Resources Management Program (VCP) (also called the Virginia Coastal Zone Management Program). The VCP consists of a network of programs administered by several agencies. The DEQ coordinates the review of federal consistency determinations with agencies administering the Enforceable and Advisory Policies of the VCP.

Federal Consistency Objection

A federal consistency determination (Appendix C) was submitted with the EA that includes an analysis of the enforceable policies of the VCP. In accordance with 15 C.F.R. 930.43(a), the Commonwealth of Virginia objects to the Army's consistency determination for this project and finds the project, as proposed, inconsistent with the air pollution control enforceable policy administered by the Department of Environmental Quality Air Quality Division (Virginia Code 10-1.1300 through 10.1-1320). Specifically, the DEQ Air Quality Division finds the EA contains insufficient information to support the Army's consistency determination and a lack of mitigation measures for the Victory Center and Mark Center alternatives.

Required Information Necessary to Determine Consistency with the Air Pollution Control Enforceable Policy of the VCP

Air Pollution Control: General Conformity. A general conformity analysis is required for the BRAC projects at Fort Belvoir because the Washington Metropolitan Area, of which Fort Belvoir is a part, is a non-attainment area for two criteria pollutants: the 8-hour ozone standard and the fine particulate standard of the National Ambient Air Quality Standards (NAAQS) (see section 176(c) of the federal Clean Air Act). Analysis by the Air Quality Division indicates that the cumulative emissions impact of ozone precursors attributable to the BRAC projects will exceed the general conformity thresholds for the area. Accordingly, the air quality mitigation measures required under the *Final General Conformity Determination (GCD) for Implementation of 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia* should apply to each of the proposed alternative sites. It is DEQ's position that these air quality mitigation measures also apply to the Victory Center and Mark Center sites.

Summary of Needed Information. As indicated above, we require the following information to allow a determination of the consistency of the proposed BRAC projects with the Air Pollution Control enforceable policy:

- If the 6,400 employees that are the subject of this review are part of the 22,000 personnel identified in the Final June 2007 EIS, then DEQ requires additional information as to the disposition of the remaining approximately 15,600 personnel.
- If the 6,400 employees are in addition to the 22,000 described in 2007, then the air quality effects, including any additional emissions generated, must be re-evaluated in relation to the State Implementation Plan (SIP) emission budgets developed and agreed upon in July 2007 and contingent upon the conditions previously identified concerning federal consistency with coastal programs.
- If additional sites are considered for the implementation of BRAC Recommendation 133 at Fort Belvoir and/or the assumptions used in this final EA change, then an updated analysis must be performed to evaluate the potential air quality impacts resulting from any demolition, construction, and operational activities, including emissions from vehicular traffic.
- A discussion of mitigation measures proposed for the Victory Center and Mark Center alternatives.

Notification Requirement.

In accordance with the *Federal Consistency Regulations, 15 CFR Part 930, section 930.43(e)*, the Army must notify DEQ if it decides to proceed, despite our objection, before the project commences.

DEQ encourages the Army, in accordance with 15 C.F.R. 930.43(d), to work with DEQ to reach an agreement on modifications that would result in the project's consistency with the air pollution control enforceable policy of the VCP. To coordinate this activity, contact Tom Ballou, Director of the Office of Air Data Analysis and Planning at (804) 698-4406.

ENVIRONMENTAL IMPACTS AND MITIGATION

1. Air Pollution Control. According to the EA (page 3-46), the U.S. EPA has designated Fairfax County and the City of Alexandria as moderate nonattainment for the 8-hour ozone standard. BMPs would be required and implemented for both construction emissions and stationary point source emissions associated with the GSA site alternative. Emissions would not exceed *de minimis* thresholds at the Mark and Victory sites.

1(a) Agency Jurisdiction. DEQ's Air Quality Division, on behalf of the State Air Pollution Control Board, is responsible to develop regulations that become Virginia's Air Pollution Control Law. DEQ is charged to carry out mandates of the state law and related regulations as well as Virginia's federal obligations under the Clean Air Act as amended in 1990. The objective is to protect and enhance public health and quality of life through control and mitigation of air pollution. The division ensures the safety and quality of air in Virginia by monitoring and analyzing air quality data, regulating sources of air pollution, and working with local, state and federal agencies to plan and implement strategies to protect Virginia's air quality. The appropriate regional office is directly responsible for the issue of necessary permits to construct and operate all stationary sources in the region as well as to monitor emissions from these sources for compliance. As a part of this mandate, the environmental documents of new projects to be undertaken in the State are also reviewed. In the case of certain projects, additional evaluation and demonstration must be made under the general conformity provisions of state and federal law.

1(b) Air Quality Mitigation Measures. According to the DEQ Air Quality Division, the three proposed alternative sites are all located in the Northern Virginia ozone and fine particulate matter (PM_{2.5}) nonattainment areas. Activity at any one of these proposed sites may potentially have an effect on the area's ability to comply with the National Ambient Air Quality Standards. Accordingly, the air quality mitigation measures required under the *Final General Conformity Determination (GCD) for Implementation of 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia* should apply to each of the proposed alternative sites. DEQ does not agree with statements in the document (pages ES-5, 4-4 and C-3) that the Victory Center and Mark Center alternatives "...are distinctly different activities from the situation outlined in the GCD." Moreover, it is DEQ's position that these air quality mitigation measures apply to all actions located in the Northern Virginia nonattainment

area that are associated with the *Final Environmental Impact Statement (EIS) for Implementation of 2005 Base Realignment and Closure Recommendations and Related Army Actions at Fort Belvoir (June 2007)* in its entirety.

1(c) Comprehensive Review. The proposed action evaluated in the Final EA is the relocation of approximately 6,400 personnel, including Washington Headquarters Services and administrative activities. It is unclear whether the movements included in this EA are a portion of the net increase of 22,000 personnel identified in the Final EIS (June 2007) or if this is potentially an additional 6400 employees being added to the Fort Belvoir workforce. It is DEQ's position that the complete implementation of the 2005 BRAC recommendations and related Army actions at Fort Belvoir should be identified, evaluated, and reviewed as a whole and not presented in piecemeal fashion.

1(d) Preferred Alternative. Neither the Final EA nor the Draft FONSI identifies a preferred alternative site for the proposed action. On the contrary, both documents allude to the possible use of additional sites, not evaluated in the Final EA, to accommodate this personnel relocation. In general, DEQ would support alternatives that minimize impacts to air quality, promote increased use of mass transit, and provide for the controlled growth of base activities into the foreseeable future.

1(e) Requirements. This proposal is subject to the following requirements with respect to air emissions.

- If the 6,400 employees that are the subject of this review are part of the 22,000 personnel identified in the Final June 2007 EIS, then DEQ requires additional information as to the disposition of the remaining approximately 15,600 personnel.
- If the 6,400 employees are in addition to the 22,000 described in 2007, then the air quality effects including any additional emissions generated must be re-evaluated in relation to the State Implementation Plan (SIP) emission budgets developed and agreed upon in July 2007 and contingent upon the conditions previously identified concerning federal consistency with coastal programs.
- If additional sites are considered for the implementation of BRAC Recommendation 133 at Fort Belvoir and/or the assumptions used in this final EA change, then an updated analysis must be performed to evaluate the potential air quality impacts resulting from any demolition, construction, and operational activities, including emissions from vehicular traffic.

1(f) Volatile Organic Compounds and Oxides of Nitrogen. The Army should take all reasonable precautions to limit emissions of volatile organic compounds (VOCs) and oxides of nitrogen (NO_x). VOCs and NO_x, principally by controlling or limiting the burning of fossil fuels.

There are some limitations on the use of "cut-back" (liquefied asphalt cement, blended with petroleum solvents) that may apply to the project (9 VAC 5-40-5490).

Furthermore, there are time-of-year restrictions on its use during the months of April through October in VOC emission control areas.

1(g) Fugitive Dust. During construction, fugitive dust must be kept to a minimum by using control methods outlined in 9 VAC 5-50-60 et seq. of the *Regulations for the Control and Abatement of Air Pollution*. These precautions include, but are not limited to, the following:

- Use, where possible, of water or chemicals for dust control;
- Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
- Covering of open equipment for conveying materials; and
- Prompt removal of spilled or tracked dirt or other materials from paved streets and removal of dried sediments resulting from soil erosion.

1(h) Open Burning. If project activities include the burning of construction or demolition material, this activity must meet the requirements under 9 VAC 5-40-5600 et seq. of the *Regulations* for open burning, and it may require a permit. The *Regulations* provide for, but do not require, the local adoption of a model ordinance concerning open burning. The Army should contact Fairfax County or City of Alexandria officials to determine what local requirements, if any, exist.

1(i) Fuel Burning Equipment. Should the facility require the installation of fuel burning equipment (e.g. boilers and generators), a permit may be required prior to beginning construction of the facility. The provisions of 9 VAC 5 Chapter 50 (9 VAC 5-50-10 et seq.) and 9 VAC 5 Chapter 80 (9 VAC 5-80-10 et seq.) apply. The Army should review those provisions and contact DEQ-NRO for guidance on whether those provisions apply.

2. Transportation Impacts. According to the EA (page ES-2), long-term minor adverse effects on transportation under the GSA site, Victory Center, and Mark Center alternatives would be expected due to BRAC 133. Implementation of the potential transportation improvements that have been identified in conjunction with the proposed action would not result in significant adverse environmental effects. All the alternatives would contribute to the need for improvements to the surrounding transportation systems.

2(a) Comments. The Secretary of Transportation, on behalf of the Virginia Department of Transportation (VDOT) provided extensive comments on the proposal in a July 30, 2008 letter (attached) submitted directly to the Army.

Main Post and Engineer Proving Grounds Sites

Much of the concerns expressed in the July 30, 2008 letter address the relocation of the Washington Headquarters Service to the Main Post and the Engineering Proving Grounds (EPG). In June 2007 the Army published its *Final Environmental Impact Statement (EIS) for Implementation of 2005 Base Realignment and Closure (BRAC) Recommendation and Related Army Actions at Fort Belvoir, Virginia*. On August 7, 2007, the Army issued a Record of Decision (ROD) that deferred decision making on the disposition of BRAC 133 to Fort Belvoir. The EIS evaluated proposals for facilities for BRAC 133 at the EPG and Main Post. Those locations are not evaluated again in this EA. However, they remain potentially available for selection. According to the EA (page ES-1), if either EPG or Main Post are to be selected for BRAC 133, such selection will be done through a supplemental ROD rather than subsequent to this EA. Therefore, EPG and Main Post sites are outside the scope of this EA.

The understanding at the Office of the Secretary is that although three potential sites (GSA Warehouse, Victory Center and Mark Center) were studied in the EA, development sites at Main Post and the Engineer Proving Grounds are still being considered for Washington Headquarters Services. The Secretary has deep concerns over the potential for the relocation of another 6,400 employees to the Main Post and Engineer Proving Grounds. Based on the traffic studies prepared for the EA and the June 2007 Final Environmental Impact Statement for Fort Belvoir Base Realignment and Closure, traffic congestion and operational problems can be expected unless substantial regional roadway improvements are provided in conjunction with development of the GSA Warehouse, Main Post and Engineer Proving Grounds. The Army's analysis indicates failing levels of service at several interchanges on I-95 and much of the U.S. 1 corridor adjacent to Fort Belvoir if mitigating improvements are not constructed. Furthermore, the Secretary disagrees with the Army's position that the 2007 EIS sufficiently evaluated the impacts of the four land use alternatives. According to Secretary, none of the four land use alternatives presented in the EIS studied the cumulative impacts of placing the National Geospatial Intelligence Agency on the EPG and the Washington Headquarters Services on the Main Post under the same land use scenario. See the Secretary's response (attached) for additional comments on the Main Post and EPG sites.

GSA, Victory Center and Mark Center Sites

With respect to the three alternatives under review, the Secretary finds that traffic congestion and operational problems can be expected unless substantial, regional roadway improvements are provided in conjunction with development of the GSA Warehouse. The GSA and Victory Center sites are located near Metrorail and/or Virginia Railway Express stations and offer the most potential for reducing vehicular trips generated by the proposal. The Engineer Proving Grounds, Main Post and Mark

Center locations do not offer convenient access to Metrorail or VRE and will most likely not be able to achieve the Army's trip reduction goals.

The letter notes that the EA indicates that the Army would pursue specific, identified site access and local road improvements through the Defense Access Road program. The Secretary is concerned about whether any of the recommended road improvements would qualify under the Defense Access Road program. Developer funded studies at the Victory Center and Mark Center sites only analyzed the impacts to the immediate local roadway networks. These studies should be expanded to determine the impacts of the Washington Headquarters Services development on surrounding local and regional roadways.

2(b) Recommendations. VDOT offers the following recommendations for this proposal:

- Additional transportation analysis, documentation, mitigation and cost estimates should be performed if the Main Post is selected as the future site of the Washington Headquarters Services.
- Transportation mitigation improvements described in the EA should be submitted to the Defense Access Road program staff to determine their eligibility prior to the selection of the preferred site.
- Additional traffic impact analyses should be performed, particularly for the Victory Center and Mark Center alternatives.

2(c) Conclusion. Overall, the selection of the future location of the Washington Headquarters Services could have a profound impact on the Northern Virginia region. Choosing a site that has limited transit access, lacks local support, and negatively impacts local and regional transportation infrastructure is not in the best interest of the Army or the citizens of the Commonwealth. The Army should secure transportation funding for the mitigation projects listed in the EA prior to making this important land use decision.

3. Water Quality & Wetlands. According to the EA (page 3-110), minor reductions in impervious surface cover under both the GSA and Victory Center alternatives would be expected to contribute to slight long-term beneficial effects on water resources. At the Mark Center site, increases in impervious land cover would occur with eventual build-out of Mark Center, whether or not the Army acquires the site for BRAC 133. Under any of the three alternatives, appropriate required storm water management practices and designs would be expected to be incorporated into development designs and followed during construction to minimize any adverse effects of increased storm water and nonpoint source pollution.

The EA (page 4-5) states that there would be no effects on wetlands as none are present in the footprints of any of the alternatives, and onsite best management practices (BMPs) would help protect downstream riparian areas, water quality, and other resources.

3(a) Agency Jurisdiction. The State Water Control Board (SWCB) promulgates Virginia's water regulations, covering a variety of permits to include Virginia Pollutant Discharge Elimination System Permit, Virginia Pollution Abatement Permit, Surface and Groundwater Withdrawal Permit, and the Virginia Water Protection Permit (VWPP). The VWPP is a State permit which governs Wetlands, Surface Water, and Surface Water Withdrawals/Impoundments. It also serves as § 401 certification of the federal Clean Water Act § 404 permits for dredge and fill activities in waters of the U.S. The VWPP Program is under the Office of Wetlands and Water Protection/Compliance, within the DEQ Division of Water Quality Programs. In addition to central office staff that review and issue VWP permits for transportation and water withdrawal projects, the seven DEQ regional offices perform permit application reviews and issue permits for the covered activities.

3(b) Agency Comments. The staff of the DEQ Northern Regional Office (NRO) notes that the EA states that no surface water (streams, wetlands and/or open water) are located within the three proposed sites, except for a concrete lined channel which drains into a stormwater management pond at the Mark Center site. If the channel can be defined as a surface water, authorization under the VWP Program may be required prior to commencing construction activities that may impact the feature.

3(c) Requirement. Should the Army choose the Mark Center site, the project manager should contact the VWP Permitting Manager at Northern Regional Office of DEQ to verify whether the concrete lined channel is surface water regulated under the VWPP Program Regulation 9 VAC 25-210.

4. Subaqueous Lands Impacts. The document (page C-4) states that no subaqueous land use is proposed under this action. This project involves no encroachments in, on, or over state-owned submerged lands.

4(a) Agency Jurisdiction. The Virginia Marine Resources Commission (VMRC), pursuant to Section 28.2-1200 *et seq.* of the Code of Virginia, has jurisdiction over any encroachments in, on, or over any state-owned rivers, streams, or creeks in the Commonwealth. For any development that involves encroachments channelward of ordinary high water along natural rivers and streams, a Joint Permit Application (JPA) must be submitted to VMRC for review and approval.

The VMRC serves as the clearinghouse for the JPA used by the:

- VMRC for encroachments on or over state-owned subaqueous beds as well as tidal wetlands;
- U.S. Army Corps of Engineers (Corps) for issuing permits pursuant to Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act;
- DEQ for issuance of a Virginia Water Protection Permit; and
- local wetlands board for impacts to wetlands.

Application for a permit for subaqueous lands impacts may be made by submitting a JPA (form MRC 30-300) to VMRC.

4(b) Agency Comments. VMRC did not indicate that subaqueous impacts would occur at any of the alternative sites.

For additional information, contact Elizabeth Gallup, VMRC at (757) 247-8027.

5. Erosion and Sediment Control and Stormwater Management. According to the EA (page 4-4), short-term minor adverse effects due to increased sediment in runoff could occur during land disturbance activities associated with construction and demolition activities and redevelopment. Such effects would be minimized through the use of construction-specific BMPs and development of site-specific plans for sediment and erosion control and storm water runoff during construction. The GSA site and Victory Center alternatives would have long-term beneficial effects resulting from minor reductions in impervious surfaces, and the Mark Center alternative would have long-term minor adverse effects from increased runoff as a result of a greater amount of impervious surfaces.

5(a) Agency Jurisdiction. DCR's Division of Soil and Water Conservation (DSWC) administers the *Virginia Erosion and Sediment Control Law and Regulations (VESCL&R)* and *Virginia Stormwater Management Law and Regulations (VSWML&R)*.

5(b) Erosion and Sediment Control and Stormwater Management Plans.

According to DCR-DSWC, the Army and its authorized agents conducting regulated land-disturbing activities on private and public lands in the state must comply with the *VESCL&R*, *VSWML&R* including coverage under the general permit for stormwater discharge from construction activities, and other applicable federal nonpoint source pollution mandates (e.g., *Clean Water Act* Section 313, federal consistency under the *Coastal Zone Management Act*). Clearing and grading activities, installation of staging areas, parking lots, roads, buildings, utilities, or other structures, soil or dredge spoil areas, or related land conversion activities that disturb greater than 2,500 square feet or more in designated Chesapeake Bay Preservation Areas (CBPAs), or areas on federal lands which are analogous to CPBAs, would be regulated by *VESCL&R* and

VSWML&R. Accordingly, the Army must prepare and implement erosion and sediment control (ESC) plan to ensure compliance with state law and regulations. The ESC plan is submitted to the DCR Regional Office that serves the area where the project is located for review for compliance. The Army is ultimately responsible for achieving project compliance through oversight of on site contractors, regular field inspection, prompt action against non-compliant sites, and other mechanisms consistent with agency policy. [Reference: *VESCL* §10.1-567].

5(c) Virginia Stormwater Management Program General Permit for Stormwater Discharges from Construction Activities. DCR is responsible for the issuance, denial, revocation, termination and enforcement of the Virginia Stormwater Management Program (VSMP) General Permit for Stormwater Discharges from Construction Activities (previously known as Virginia Pollutant Discharge Elimination System (VPDES) General Permit for Stormwater Discharges from Construction Activities) related to municipal separate storm sewer systems (MS4s) and construction activities for the control of stormwater discharges from MS4s and land disturbing activities under the Virginia Stormwater Management Program.

The operator or owner of construction activities involving land-disturbing activities equal to or greater than 2,500 square feet (CPBA) are required to register for coverage under the General Permit for Discharges of Stormwater from Construction Activities and develop a project specific stormwater pollution prevention plan (SWPPP). Construction activities requiring registration also includes the land disturbance of less than one acre of total land area that is part of a larger common plan of development or sale if the larger common plan of development will ultimately disturb equal to or greater than one acre. The SWPPP must be prepared prior to submission of the registration statement for coverage under the general permit and the SWPPP must address water quality and quantity in accordance with the VSMP Permit Regulations. General information and registration forms for the General Permit are available on DCR's website at http://www.dcr.virginia.gov/soil_&_water/vsmp.shtml. [Reference: *Virginia Stormwater Management Law Act* §10.1-603.1 *et seq.*; VSMP Permit Regulations 4VAC-50 *et seq.*]

6. Chesapeake Bay Preservation Areas. According to the document (page C-7), Chesapeake Bay Resource Protection Areas (RPAs) are present on or adjacent to all the alternative sites for BRAC 133. Plans are in place to offset the RPA overlap on the Victory Center with low impact development (LID) measures. For all alternatives, site-specific stormwater management plans will be developed by the construction contractors prior to site disturbance activities, and BMPs would be developed and implemented in accordance with an on-site SWPPP.

6(a) Agency Jurisdiction. DCR's Division of Chesapeake Bay Local Assistance (DCBLA) administers the coastal lands management enforceable policy of the VCP which is governed by the *Chesapeake Bay Preservation Act (Bay Act)* (*Virginia Code*

§10.1-2100-10.1-2114) and *Chesapeake Bay Preservation Area Designation and Management Regulations (Regulations)* (9 VAC 10-20 et seq.).

6(b) General Comments. DCR-DCBLA notes that, pursuant to the *Coastal Zone Management Act of 1972*, as amended, federal activities affecting Virginia's coastal resources or coastal uses must be consistent with the Virginia Coastal Resources Management Program (section 307(c)(1) of the Act and the *Federal Consistency Regulations*, 15 CFR Part 930, sub-part C).

The 1998 *Chesapeake Ecosystem Unified Plan* requires the signatories, including the Department of the Army, to fully cooperate with local and state governments in carrying out voluntary and mandatory actions to comply with the management of stormwater. All signatory agencies committed to encouraging construction design that a) minimizes natural area loss on new and rehabilitated federal facilities; b) adopts low impact development and best management technologies for storm water, sediment and erosion control, and reduces impervious surfaces; and c) considers the *Conservation Landscaping and BayScapes Guide for Federal Land Managers*.

The Chesapeake 2000 Agreement committed the signatory agencies to a number of sound land use and stormwater quality controls. The signatories additionally committed the agencies to lead by example with respect to controlling nutrient, sediment and chemical contaminant runoff from government properties. In December 2001, the Executive Council of the Chesapeake Bay Program issued *Directive No. 01-1: Managing Storm Water on State, Federal and District-owned Lands and Facilities*, which includes specific commitments for agencies to lead by example with respect to stormwater control.

6(c) Chesapeake Bay Preservation Areas. The Chesapeake Bay Preservation Act, as locally implemented through the Fairfax County *Chesapeake Bay Preservation Ordinance* and the City of Alexandria *Environmental Management Ordinance*, strictly controls land disturbance in environmentally sensitive lands called Resource Protection Areas (RPAs) and Resource Management Areas (RMAs).

The *Regulations* (9 VAC 10-20-80 B 5) mandate that RPAs shall include, "A buffer area not less than 100 feet in width located adjacent to and landward of all "water bodies with perennial flow that have an intrinsic water quality value due to the ecological and biological processes they perform or are sensitive to impacts which may cause significant degradation to the quality of state waters." The only land-disturbing activities allowed in RPAs are those associated with:

- (a) the construction of water wells,
- (b) the construction of passive recreation facilities such as boardwalks, trails and pathways; and

(c) historic preservation and archeological activities (9 VAC 10-20-130-2).

RMAs are subject to the jurisdiction-wide performance criteria for development activities in Fairfax County and the City of Alexandria, and to general performance criteria found in 9 VAC 10-20-120 of the *Regulations*, including requirements to:

- minimize land disturbance, preserve indigenous vegetation, and minimize post-development impervious surfaces;
- satisfy stormwater management criteria consistent with water quality protection provisions of the *Virginia Stormwater Management Regulations* (4 VAC 50-60-60 et seq.); and
- comply with the requirements of the *Virginia Erosion & Sediment Control Handbook*, Third Edition, 1992 for land disturbance over 2,500 square feet.

6(d) Findings. Based on a review of the Fairfax County Chesapeake Bay Preservation Areas map, DCR-DCBLA finds that proposed development/redevelopment at the GSA site will not impact any RPAs. According to the EA, the Army plans to offset the RPA overlap on the Victory Center located in Alexandria with low impact development (LID) practices. All the Army's proposed alternative sites are located within local jurisdiction-wide RMAs.

6(e) Requirements. In order to be consistent to the maximum extent practicable with the coastal lands management enforceable policy of the VCP, development must be consistent with the applicable performance criteria of the *Chesapeake Bay Preservation Area Designation and Management Regulations*. Accordingly, the proposed development activities must be consistent with the performance criteria described above.

6(f) Conclusion. Provided the Army adheres to the applicable performance criteria described above, DCR-DCBLA finds the proposed action would be consistent with the coastal lands management enforceable policy of the VCP as administered through the *Bay Act and Regulations*.

7. Solid and Hazardous Wastes and Hazardous Materials. According to the EA (page 3-100) solid waste would be generated due to construction at the selected site. No effects on hazardous or toxic substances would be expected under the GSA or Mark site alternatives (page 3-105). Due to presence of elevated levels in lead and arsenic in soils under the Victory site, the EA (page 3-106) recommends that if any contaminated soil is disturbed during site construction activities, it should be characterized and properly disposed.

7(a) Agency Jurisdiction. Solid and hazardous wastes in Virginia are regulated by the Virginia Department of Environmental Quality, the Virginia Waste Management Board

(VWMB) and the U.S. Environmental Protection Agency. They administer programs created by the federal Resource Conservation and Recovery Act, Comprehensive Environmental Response Compensation and Liability Act, commonly called Superfund, and the Virginia Waste Management Act. DEQ administers regulations established by the VWMB and reviews permit applications for completeness and conformance with facility standards and financial assurance requirements. All Virginia localities are required, under the Solid Waste Management Planning Regulations, to identify the strategies they will follow on the management of their solid wastes to include items such as facility siting, long-term (20-year) use, and alternative programs such as materials recycling and composting.

7(b) Agency Comments. DEQ's Waste Division staff determined that both solid and hazardous waste issues and sites were addressed in the report. A geographic information system (GIS) database search did not reveal any waste sites within a half mile radius that would impact or be impacted by construction activities at the subject site.

Staff performed a cursory review of Waste Division data files and determined that there are several hazardous waste, solid waste formerly used defense sites (FUDS) and a voluntary remediation program (VRP) projects located in the same zip code. These are as follows.

Hazardous Waste Site

- US GENERAL SERVICES ADMINISTRATION, VA4470039336 LQG (ACTIVE)

Solid Waste Sites

- 22304 Covanta Alexandria Arlington Incorporated, SWP 435, Energy Recovery/Incineration Facility
- 22304 FCR Incorporated, PBR 088, Materials Recovery Facility
- 22304 Inova Alexandria Hospital, PBR 202, RMW Steam Sterlizer
- 22304 Morgan Distribution, PBR 247, RMW Steam Sterlizer

Formerly Used Defense Sites

- C03VA0176, VA9799F1651, ARLINGTON HALL TRNG, ALEXANDRIA
- C03VA0508, VA9799F1710, CAMERON STA, ALEXANDRIA

Voluntary Remediation Program Sites

- VRP00247, Landmark Professional Center, Certificate Issued

- VRP00347, Sparkle Dry Cleaners, Certificate Issued
- VRP00260, Fairfax Lumber & Millwork Company, Inc., Enrolled in Program
- VRP00493, Midtown Springfield-Hotel Parcel, Eligibility Pending
- VRP00359, Park Cleaners, Certificate Issued

7(c) Waste Management. Any soil that is suspected of contamination or wastes that are generated during construction-related activities must be tested and disposed of in accordance with applicable federal, state, and local laws and regulations.

7(d) Asbestos-containing Material and Lead-based Paint. All structures being demolished, renovated, or removed, should be checked for asbestos-containing materials (ACM) and lead-based paint (LBP) prior to demolition. If ACM or LBP are found, in addition to the federal waste-related regulations mentioned above, State regulations 9VAC 20-80-640 for ACM and 9VAC 20-60-261 for LBP must be followed.

7(e) Recommendations. The DEQ Waste Division recommends the following:

- The following websites may be accessed to locate additional information on hazardous waste, solid waste, FUDS and VRP sites using their identification numbers:
 - <http://www.epa.gov/superfund/sites/cursites/index.htm> or
 - http://oaspub.epa.gov/enviro/ef_home2.waste
- DEQ encourages all construction projects and facilities to implement pollution prevention principles, including the reduction, reuse, and recycling of all solid wastes generated. All generation of hazardous wastes should be minimized and handled appropriately.

If you have any other questions or need further information, contact Paul Kohler at (804) 698-4208.

8. Pesticides and Herbicides. DEQ recommends that the use of herbicides or pesticides for construction or landscape maintenance should be in accordance with the principles of integrated pest management. The least toxic pesticides that are effective in controlling the target species should be used. Please contact the Department of Agriculture and Consumer Services at (804) 786-3501 for more information.

9. Natural Heritage Resources. Development of the EA was coordinated with the Department of Conservation and Recreation-Division of Natural Heritage (Appendix B2).

9(a) Agency Jurisdiction The mission of the Virginia Department of Conservation and Recreation is to conserve Virginia's natural and recreational resources. DCR supports a

variety of environmental programs organized within seven divisions including the Division of Natural Heritage. The Natural Heritage Program's (DCR-DNH) mission is conserving Virginia's biodiversity through inventory, protection, and stewardship. The Virginia Natural Area Preserves Act, 10.1-209 through 217 of the Code of Virginia, was passed in 1989 and codified DCR's powers and duties related to statewide biological inventory: maintaining a statewide database for conservation planning and project review, land protection for the conservation of biodiversity, and the protection and ecological management of natural heritage resources (the habitats of rare, threatened, and endangered species, significant natural communities, geologic sites, and other natural features).

9(b) Finding. DCR-DNH searched its Biotics Data System for occurrences of natural heritage resources at the alternative sites. Biotics documents the presence of natural heritage resources in the area. However, due to the scope of the activity and the distance to the resources, DCR-DNH does not anticipate that future redevelopment of these properties would adversely impact these natural heritage resources.

9(c) State-listed Plant and Insect Species. The Endangered Plant and Insect Species Act of 1979, Chapter 39 §3.1-1020 through 1030 of the Code of Virginia, as amended, authorizes the Virginia Department of Agriculture and Consumer Services (VDACS) to conserve, protect, and manage endangered and threatened species of plants and insects. The VDACS Virginia Endangered Plant and Insect Species Program personnel cooperates with the U.S. Fish and Wildlife Service (USFWS), DCR-DNH and other agencies and organizations on the recovery, protection or conservation of listed threatened or endangered species and designated plant and insect species that are rare throughout their worldwide ranges. In those instances where recovery plans, developed by USFWS, are available, adherence to the order and tasks outlined in the plans are followed to the extent possible.

Under a Memorandum of Agreement established between VDACS and DCR, DCR represents VDACS in comments regarding potential impacts on State-listed threatened and endangered plant and insect species. DCR finds that the current activity will not affect any documented State-listed plants or insects.

9(d) State Natural Area Preserves. DCR files do not indicate the presence of any State Natural Area Preserves under the agency's jurisdiction in the project vicinity.

9(e) Recommendation. Contact DCR-DNH, Rene Hypes at (804) 371-2708 for an update on natural heritage information if a significant amount of time passes before the project is initiated since new and updated information is continually added to Biotics.

10. Wildlife Resources and Protected Species. Development of the EA was coordinated with the Department of Game and Inland Fisheries (Appendix B2).

10(a) Agency Jurisdiction. The Department of Game and Inland Fisheries (DGIF), as the Commonwealth's wildlife and freshwater fish management agency, exercises enforcement and regulatory jurisdiction over wildlife and freshwater fish, including state or federally listed endangered or threatened species, but excluding listed insects (*Virginia Code* Title 29.1). The DGIF is a consulting agency under the U.S. Fish and Wildlife Coordination Act (16 U.S.C. sections 661 et seq.), and provides environmental analysis of projects or permit applications coordinated through DEQ and several other state and federal agencies. DGIF determines likely impacts upon fish and wildlife resources and habitat, and recommends appropriate measures to avoid, reduce, or compensate for those impacts.

10(b) Agency Comments. According to DGIF records, the GSA site (Alternative A) is located within close proximity to Accotink Creek which has been designated a Confirmed Anadromous Fish Use Area. The Victory Center (Alternative B) and Mark Center (Alternative C) sites are located within close proximity of Cameron Run which has been designated a Potential Anadromous Fish Use Area. However, based on the proposed activities, it does not appear that these waters, or their tributaries, will be adversely impacted by the project.

10(c) Recommendations. Overall, DGIF prefers the GSA site and Victory Center site to the Mark Center site. The Mark Center currently retains some wildlife habitat on site and on adjacent lands. DGIF would prefer the reconstruction of currently developed areas, such as Alternatives A and B, to the development of currently undeveloped lands.

To minimize overall impacts to wildlife and natural resources, DGIF recommends that the Army:

- Avoid and minimize impacts to undisturbed forest, wetlands, and streams to the fullest extent practicable.
- Maintain undisturbed wooded buffers of at least 100 feet in width around all on-site wetlands and on both sides of all perennial and intermittent streams.
- Maintain wooded lots to the fullest extent possible.
- Design stormwater controls to replicate and maintain the hydrographic condition of the site prior to the change in landscape, including:
 - utilizing bioretention areas; and
 - minimizing the use of curb and gutter in favor of grassed swales.

Bioretention areas (also called rain gardens) and grass swales are components of Low Impact Development (LID). They are designed to capture stormwater runoff as close to the source as possible and allow it to slowly infiltrate into the surrounding soil. They

benefit natural resources by filtering pollutants and decreasing downstream runoff volumes.

10(d) Conclusion. Assuming the Army adheres to strict erosion and sedimentation controls, DGIF finds the proposal consistent to the maximum extent practicable with the fisheries management enforceable policy of the Virginia Coastal Resources Management Program.

Contact Amy Ewing, DGIF at (804) 367-2733, for additional information regarding these comments.

11. Water Supply. According to the EA (page 3-92), potable water is supplied to all sites by a local water utility.

11(a) Agency Jurisdiction. The Virginia Department of Health (VDH), Office of Drinking Water (ODW) reviews projects for the potential to impact public drinking water sources (groundwater wells and surface water intakes).

11(b) Agency Comments. VDH finds that there are no groundwater sources within one mile of the project site and no surface water intakes within five miles.

11(c) Requirements. According to VDH, potential impacts to public water distribution systems or sanitary sewage collection systems must be verified by the local utility.

Contact William Rucker, VDH at (804) 864-7495 for additional information.

12. Historic Structures and Archaeological Resources. This project is currently being coordinated with the Department of Historic Resources. According to the EA (page ES-6), no effects on cultural resources would be expected under any of the alternatives, pending potential re-survey of the Mark Center BRAC 133 footprint for archaeological resources and review and verification by Alexandria Archaeology and the Virginia State Historic Preservation Officer (SHPO).

12(a) Agency Jurisdiction. The Department of Historic Resources (DHR) conducts reviews of projects to determine their effect on historic structures or cultural resources under its jurisdiction. DHR, as the designated State's Historic Preservation Office, ensures that federal actions comply with Section 106 of the National Historic Preservation Act of 1962 (NHPA), as amended, and its implementing regulation at 36 CFR Part 800. The NHPA requires federal agencies to consider the effects of federal projects on properties that are listed or eligible for listing on the National Register of Historic Places. Section 106 also applies if there are any federal involvements, such as licenses, permits, approvals or funding.

12(b) Agency Comments. According to DHR, the Army is in consultation with DHR regarding this project pursuant to Section 106 of the NHPA. DHR anticipates that this consultation will continue.

For additional information, contact Marc Holma, DHR at (804) 367-2323, ext. 114.

13. Local Comments. Fairfax County and the City of Alexandria provided extensive comments on the proposal in letters dated August 8, 2008 and August 13, 2008, respectively, and submitted directly to the Army. The full texts of the localities' comments are attached.

Fairfax County

Fairfax County supports the Army's decision to consider the federally-owned GSA site for the BRAC 133 Washington Headquarters Service relocation. According to the County, the proximity of the 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 residential and leisure opportunities for employees at the GSA site. The County believes that the proximity of the GSA site to Fort Belvoir, the Pentagon and the Springfield Mall and downtown area provide a level of convenience not available at any other site under consideration. Furthermore, 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 County strongly believes the GSA Warehouse site is the best suited location for BRAC 133, Washington Headquarters Services because this site:

- Is within walking distance to the Franconia Springfield Metro Station a major transportation/transit hub which offers more transportation alternatives (Metro Bus, Metro Rail, Virginia Railway Express, 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 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.
- Has 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.

- Puts 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.
- Is 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. Close proximity to major access routes will allow for more convenient carpooling opportunities for WHS employees unable to use traditional transit services.
- Is the closest of all sites (including Main Post and the EPG) to Metrorail and Virginia Railway Express 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.
- 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.
- Is in proximity to efficient and convenient transit service which is an important and cost-effective method to help reduce both vehicle miles traveled 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.

For additional information, contact Mark Canale, Fairfax County at (703) 324-1177.

City of Alexandria

The City of Alexandria supports the location of the Washington Headquarters Service (WHS) to either the Mark Winkler or to the Victory Center site. Both sites are quality locations which can well meet WHS requirements now and far into the future.

Because the WHS site is a relocation of employees, many of whom already travel the I-95 and I-395 corridors, the city agrees with the conclusion of the EA that the dissipation of the traffic to either of the Alexandria sites is such that the impact to the regional roadway network is manageable. In fact, the relocation of the WHS represents a major opportunity to reduce single occupancy vehicle (SOV) trips. Finally, the density of

proposed office development at both sites in Alexandria is consistent with the Metropolitan Washington Council of Governments transportation modeling, which assumed a density of job growth similar to the WHS projected 6,409 employees.

The city is in the initial stages of implementing a planned doubling of the service and capacity of its city-sponsored DASH bus system. Construction has started on a new DASH bus maintenance facility, which is the first step in this process. According to the City, this expansion will improve the connectivity of these two sites with the rest of the city, as well as to the Metrorail system.

(i) Victory Center

- Sufficient existing roadway capacity already is in place (Eisenhower is a four-lane avenue with significant underutilized road capacity). No new roadway construction will be needed with the Victory Center site, and therefore the site does not require any Defense Access Roads funding.
- The site is within walking distance of the Van Dorn Metrorail station (although the city understands that the adjacency to a Metrorail site has been eliminated as a requirement). The Van Dorn Street interchange with I-95 is nearby. Eisenhower Avenue is served by three exits from I-95 (Telegraph, Clermont and Van Dorn), there is a new exit being constructed (Mill Road), and major improvements are underway at one exit (Telegraph).
- VRE currently runs on tracks near the Victory Center site. If this site is selected for WHS, the City would study the feasibility of locating a VRE platform behind the Victory Center site (Manassas line) or adjacent to the Van Dorn Metrorail station (Fredericksburg line).
- The City has recently adopted a long-range Master Transportation Plan that contemplates Bus Rapid Transit (BRT) service on Van Dorn Street and Eisenhower Avenue. Recent agreements in regard to the HOT lanes on I-395 include the funding of a significant increase in transit service in the Van Dorn corridor in both Fairfax County and Alexandria.
- The Victory Center would also have a Transportation Management Plan (TMP) in place that could accommodate the targeted 40% trip reduction level, with the adjacent Metrorail access being a major component of trip reduction.

(ii) Mark Center

- Traffic studies undertaken when the City approved the Mark Center office density determined the necessary road improvements for the development. These improvements, which are to be made at developer's expense, will create sufficient capacity and, therefore, no additional transportation studies are warranted. Since Duke Realty is funding these road improvements, this site does not require any Defense Access Roads funding.

- The Mark Center can accommodate the desired 40% level of trip reduction by using existing TMP measures, and by expanding those measures. The TMP measures include shuttle service, the City-operated DASH bus system, Metrobus, and the proposed governmental shuttle service.
- The City's recently adopted long-range Master Transportation Plan includes a Bus Rapid Transit (BRT) corridor on Beauregard Street, which is a short walk from the proposed WHS site.

Further information regarding these comments may be directed to Mark Jinks, City of Alexandria at (703) 838-4300.

14. Pollution Prevention. DEQ advocates that principles of pollution prevention be used in all construction projects as well as in facility operations. Effective siting, planning, and on-site Best Management Practices (BMPs) will help to ensure that environmental impacts are minimized. However, pollution prevention techniques also include decisions related to construction materials, design, and operational procedures that will facilitate the reduction of wastes at the source.

14(a) Recommendations. We have several pollution prevention recommendations that may be helpful in the construction of this project and in the operation of the facility:

- Consider development of an effective Environmental Management System (EMS). An effective EMS will ensure that the airport is committed to minimizing its environmental impacts, setting environmental goals, and achieving improvements in its environmental performance. DEQ offers EMS development assistance and it recognizes facilities with effective Environmental Management Systems through its Virginia Environmental Excellence Program.
- Consider environmental attributes when purchasing materials. For example, the extent of recycled material content, toxicity level, and amount of packaging should be considered and can be specified in purchasing contracts.
- Consider contractors' commitment to the environment (such as an EMS) when choosing contractors. Specifications regarding raw materials and construction practices can be included in contract documents and requests for proposals.
- Choose sustainable materials and practices for infrastructure construction and design. These could include asphalt and concrete containing recycled materials, and integrated pest management in landscaping, among other things.
- Integrate pollution prevention techniques into the airport maintenance and operation, to include the following: inventory control (record-keeping and centralized storage for hazardous materials), product substitution (use of non-toxic cleaners), and source reduction (fixing leaks, energy-efficient HVAC and equipment). Maintenance facilities should be designed with sufficient and

suitable space to allow for effective inventory control and preventative maintenance.

DEQ's Office of Pollution Prevention provides information and technical assistance relating to pollution prevention techniques and EMS. For more information, contact DEQ's Office of Pollution Prevention, Sharon Baxter at (804) 698-4344.

15. Energy Conservation. The proposed facility should be planned and designed to comply with state and federal guidelines and industry standards for energy conservation and efficiency. For example, the energy efficiency of the facility can be enhanced by maximizing the use of the following:

- thermally-efficient building shell components (roof, wall, floor, windows, and insulation);
- facility siting and orientation with consideration towards natural lighting and solar loads
- high efficiency heating, ventilation, air conditioning systems;
- high efficiency lighting systems and daylighting techniques; and
- energy-efficient office and data processing equipment.

Please contact Matt Heller, Department of Mines, Minerals, and Energy at (434) 951-6351 for additional information.

REGULATORY AND COORDINATION NEEDS

1. Air Quality Regulations. This project is subject to air regulations administered by the Department of Environmental Quality. The following sections of the Code of Virginia and Virginia Administrative Code are applicable:

- Virginia Code 10-1.1300 through §10.1-1320 for the State Implementation Plan administered under the federal Clean Air Act for the attainment and maintenance of the National Ambient Air Quality Standards.
- 9 VAC 5-40-5490 et seq. for the use of "cut back" asphalt;
- 9 VAC 5-50-60 et seq. governing fugitive dust emissions; and
- 9 VAC 5-40-5600 et seq. for open burning.

The installation of fuel burning equipment (e.g. boilers and generators), may require a permit (9 VAC 5-50-10 et seq. and 9 VAC 5-80-10 et seq.) prior to beginning construction of a facility.

For more information and coordination contact Tom Ballou, Director of the Office of Air Data Analysis and Planning at (804) 698-4406. Also, contact local officials for

information on any local requirements pertaining to open burning.

2. Transportation Impacts. Coordination of this proposal with respect to transportation impacts may be accomplished by contacting the Office of the Secretary of Transportation, Mr. Pierce Homer at (804) 786-8032.

3. Water Quality Impacts. The Army should contact the Corps to obtain a wetland delineation confirmation for sites that contain surface waters prior to any on-site construction activity. Should jurisdictional features be present, contact DEQ-NRO to determine the need for a Virginia Water Protection Permit (9 VAC 25-210-50). For additional information and coordination, contact Trisha Beasley, DEQ-NRO at (703) 583-3940.

4. Erosion and Sediment Control and Stormwater Management

4(a) Erosion and Sediment Control and Stormwater Management. The Army must ensure that it is in compliance with *Virginia's Erosion and Sediment Control Law* (*Virginia Code* 10.1-567) and *Regulations* (4 VAC 50-30-30 *et seq.*) and *Stormwater Management Law* (*Virginia Code* 10.1-603.5) and *Regulations* (4 VAC 3-20-210 *et seq.*). An erosion and sediment control plan may be submitted to the DCR Warrenton Regional Office at (540) 347-6420 for review and approval.

4(b) Virginia Stormwater Management Program General Permit for Stormwater Discharges from Construction Activities. For projects involving land-disturbing activities equal to or greater than 2,500 square feet Chesapeake Bay Preservation Areas, the Army is required to apply for registration coverage under the Virginia Stormwater Management Program General Permit for Discharges of Stormwater from Construction Activities. Specific questions regarding the Stormwater Management Program requirements should be directed to Holly Sepety, DCR, at (804) 225-2613.

5. Chesapeake Bay Preservation Areas. The proposed action is subject to the stringent performance criteria (9 VAC 10-20-130) and general performance criteria (9 VAC 10-20-120 *et seq.*) pursuant to the Chesapeake Bay Preservation Area Designation and Management Regulations, including erosion and sediment control requirements contained in the Regulations (4 VAC 50-30-30 *et seq.*). For additional information, contact Joan Salvati, DCR-DCBLA, at (804) 225-3440.

6. Solid and Hazardous Wastes. All solid waste, hazardous waste, and hazardous materials must be managed in accordance with all applicable federal, state, and local environmental regulations. Some of the applicable state laws and regulations are:

- Virginia Waste Management Act (*Code of Virginia* Section 10.1-1400 *et seq.*);
- Virginia Hazardous Waste Management Regulations (VHWMR) (9VAC 20-60);

- Virginia Solid Waste Management Regulations (VSWMR) (9VAC 20-80); and
- Virginia Regulations for the Transportation of Hazardous Materials (9VAC 20-110).

Some of the applicable Federal laws and regulations are:

- Resource Conservation and Recovery Act (RCRA) (42 U.S.C. Section 6901 *et seq.*);
- Title 40 of the Code of Federal Regulations; and
- U.S. Department of Transportation Rules for Transportation of Hazardous materials (49 CFR Part 107).

6(a) Asbestos-Containing Material. It is the responsibility of the owner or operator of a renovation or demolition activity, prior to the commencement of the renovation or demolition, to thoroughly inspect the affected part of the facility where the operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material (ACM). Upon classification as friable or non-friable, all waste ACM shall be disposed of in accordance with the Virginia Solid Waste Management Regulations (9 VAC 20-80-640), and transported in accordance with the Virginia regulations governing Transportation of Hazardous Materials (9 VAC 20-110-10 *et seq.*). Contact the DEQ Waste Management Program for additional information, (804) 698-4021, and the Department of Labor and Industry, Ronald L. Graham at (804) 371-0444.

6(b) Lead-Based Paint. If applicable, the proposed project must comply with the U.S. Department of Labor, Occupational Safety and Health Administration (OSHA) regulations, and with the Virginia Lead-Based Paint Activities Rules and Regulations. For additional information regarding these requirements contact the Department of Professional and Occupational Regulation, David Dick at (804) 367-8588.

7. Historic and Archaeological Resources. The Army must continue to coordinate this action with the Department of Historic Resources in accordance with *Section 106 of the National Historic Preservation Act*, as amended, and its implementing regulation 36 CFR 800. For additional information and coordination, contact Marc Holma, DHR at (804) 367-2323, ext. 114.

Implementation of 2005 BRAC Recommendation 133
Washington Headquarters Services, Fort Belvoir

Thank you for the opportunity to review the Draft Environmental Assessment and Federal Consistency Determination for the Implementation of the 2005 BRAC Recommendation 133, Washington Headquarters Services, Fort Belvoir, in Fairfax County and the City of Alexandria. Detailed comments of reviewing agencies are attached for your review. Please contact me at (804) 698-4325 or John Fisher at (804) 698-4339 for clarification of these comments.

Sincerely,



Ellie Irons, Manager
Office of Environmental Impact Review

Enclosures

cc: Pierce Homer, Secretary of Transportation
David Hartshorn, DEQ-NRO
Tom Ballou, DEQ-AQD
Paul Kohler, DEQ-ORP
Tony Watkinson, VMRC
Amy Ewing, DGIF
Ethel Eaton, DHR
Chris Adkins, VDOT
William Rucker, VDH
Matt Heller, DMME
Anthony Griffin, Fairfax County
James K. Hartmann, City of Alexandria
G. Mark Gibb, Northern Virginia Regional Commission



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1. Patrick Morone, III
Secretary of Natural Resources

September 2, 2008

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

Subject: 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

Dear Sir or Madam:

Thank you for providing the Virginia Department of Environmental Quality (DEQ), Air Division, the opportunity to comment on the Final Environmental Assessment (EA) and Draft Finding of No Significant Impact (FONSI) for Implementation of 2005 Base Realignment and Closure (BRAC) Recommendation 133 at Fort Belvoir, Virginia. This proposed action plans to relocate approximately 6400 personnel from various leased administrative space in Northern Virginia to one of three spaces located in either Fairfax county or the City of Alexandria. The Final EA provides a proposed multi-year construction schedule (2007-2011) for each site and includes emission estimates for demolition, construction, and operational activities with planned completion by the BRAC deadline of September 15, 2011.

The Virginia Department of Environmental Quality (DEQ), Air Quality Division, offers the following comments with respect to the alternatives presented in the Final EA and Draft FONSI.

Air Quality Mitigation Measures

The three proposed alternative sites: the General Services Administration (GSA) warehouse in Fairfax, the Victory Center site in Alexandria, and the Mark Center site in Alexandria are all located in the Northern Virginia ozone and fine particulate matter (PM_{2.5}) nonattainment areas. Activity at any one of these proposed sites may potentially have an effect on the area's ability to comply with the National Ambient Air Quality Standards. Accordingly, the air quality mitigation measures required under the Final General Conformity Determination (GCD) for Implementation of 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia should apply to each of the proposed alternative sites. DEQ does not agree with the Department of Army view that the Victory

Center and Mark Center alternatives " *...are distinctly different activities from the situation outlined in the GCD.*" Moreover, it is DEQ's position that these air quality mitigation measures apply to all actions located in the Northern Virginia nonattainment area that are associated with the Final Environmental Impact Statement (EIS) for Implementation of 2005 Base Realignment and Closure Recommendations and Related Army Actions at Fort Belvoir (June 2007) in its entirety.

Comprehensive Review

The proposed action evaluated in the Final EA is the relocation of approximately 6400 personnel, including Washington Headquarters Services and administrative activities. It is unclear whether the movements included in this EA are a portion of the net increase of 22,000 personnel identified in the Final EIS (June 2007) or if this is potentially an additional 6400 employees being added to the Fort Belvoir workforce. If the former scenario is correct, then DEQ requires additional information as to the disposition of the remaining approximately 15,600 personnel and any changes in the cumulative emissions impact over the time period in question. If the latter scenario applies, then the air quality effects including any additional emissions generated must be re-evaluated in relation to the SIP emission budgets developed and agreed upon in July 2007 and contingent upon the conditions previously identified concerning federal consistency with coastal programs. It is DEQ's position that the complete implementation of the 2005 BRAC recommendations and related Army actions at Fort Belvoir should be identified, evaluated, and reviewed as a whole and not presented in piecemeal fashion.

Preferred Alternative

Neither the Final EA nor the Draft FONSI identify a preferred alternative site for the proposed action. On the contrary, both documents allude to the possible use of additional sites, not evaluated in the Final EA, to accommodate this personnel relocation. In general, DEQ would support alternatives that minimize impacts to air quality, promote increased use of mass transit, and provide for the controlled growth of base activities into the foreseeable future. If additional sites are considered for the implementation of BRAC Recommendation 133 at Fort Belvoir and/or the assumptions used in this final EA change, then an updated analysis must be performed to evaluate the potential air quality impacts resulting from any demolition, construction, and operational activities, including emissions from vehicular traffic.

Thank you for providing the Virginia Department of Environmental Quality, Air Quality Division, the opportunity to review and comment. We look forward to working with you in the future.

Sincerely,



Thomas R. Ballou
Director, Air Data Analysis & Planning

cc: M. Dowd, DEQ
M. Murphy, DEQ
E. Irons, DEQ



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AUG 01 2008

Office of Environmental
Impact Review

COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION
1401 EAST BROAD STREET
RICHMOND, VIRGINIA 23219 0001

David S. Eklorn, P.E.
COMMISSIONER

August 1, 2008

Mr. John E. Fisher
Department of Environmental Quality
Office of Environmental Impact Review
629 East Main Street, Sixth Floor
Richmond, VA 23219

Re: Implementation of 2005 Base Realignment and Closure Recommendation 133 (Washington HQ Services), Ft. Belvoir

Dear Mr. Fisher:

The Virginia Department of Transportation provided comments for this EA to the Secretary of Transportation for his response to Fort Belvoir.

Enclosed is a copy of his response.

Sincerely,

Mary J. Stanley
Environmental Engineer
Virginia Department of Transportation
(804) 786-0868



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2008 JUL 30 1008

COMMONWEALTH of VIRGINIA

Office of Environmental
Impact Review

Office of the Governor

1115 Park Avenue
Richmond, Virginia 23219

July 30, 2008

Fort Belvoir BRAC
ATTN: BRAC 153 EA Comments
10306 Eaton Place, Suite 340
Fairfax, Virginia 22030

Dear Sir/Madam:

This letter is in response to the July 2008 Final Environmental Assessment Implementation of 2005 Base Realignment and Closure Recommendation 133 (Washington Headquarters Services) Fort Belvoir, Virginia. The following provides the comments of the Commonwealth on the Environmental Assessment (EA):

• Site Selection Process Our understanding is that although three potential sites (GSA Warehouse, Victory Center and Mark Center) were studied in the EA, development sites at Main Post and the Engineer Proving Grounds are still being considered for Washington Headquarters Services. **We have deep concerns over the potential for another 6400 employees being located at Main Post and Engineer Proving Grounds. These concerns are discussed below.**

• Traffic Impacts All sites being considered will have impacts on the local and regional transportation networks. Based on the traffic studies prepared for the EA and the June 2007 Final Environmental Impact Statement for Fort Belvoir Base Realignment and Closure, traffic congestion and operational problems can be expected unless substantial, regional roadway improvements are provided in conjunction with development of the GSA Warehouse, Main Post and Engineer Proving Grounds. The Army's analysis indicates failing levels of service at several interchanges on I-95 and much of the U.S. 1 corridor adjacent to Fort Belvoir if mitigating improvements are not constructed. These impacts are in addition to the expected traffic impacts of the Fort Belvoir Base Realignment and Closure development endorsed by the Army in the August 2007 Record of Decision.

• Transit & EIM The Army's stated goal of reducing site-generated traffic by 40% is noteworthy. However, in order to achieve such a significant reduction in vehicular trips to and from the Washington Headquarters Services site, convenient access to existing and future transit systems is required. The GSA Warehouse site and Victory Center are located near Metrorail and/or Virginia Railway Express stations and offer the most potential for reducing vehicular trips generated by the Washington Headquarters Services site. The Engineer Proving Grounds, Main Post and Mark Center locations do not offer convenient access to Metrorail or VRE and will most likely not be able to achieve the Army's trip reduction goals.

• Fairfax County Parkway Memorandum of Agreement - The Parkway Memorandum of Agreement among VDOT, the Army and Federal Highway Administration indicates "if at a future date a proposed Federal action would result in the number of military personnel, non-military personnel, and personnel occupying space on the Engineer Proving Grounds exceeding 8,500, the parties shall negotiate and agree upon necessary transportation infrastructure improvements and associated funding prior to the undertaking of the proposed Federal action to locate personnel at the Engineer Proving Grounds." If the Engineer Proving Grounds is selected as the home for the Washington Headquarters Services, VDOT will evaluate the need for substantial improvements to the surrounding road network in order to mitigate the traffic impacts. Past traffic studies indicate a potential need for constructing a six lane section of the Fairfax County Parkway through the Engineer Proving Grounds, improving the I-95/Fairfax County Parkway interchange, providing additional direct access into the Engineer Proving Grounds and improving the Fairfax County Parkway/Tranconia-Springfield Parkway interchange.

• Defense Access Road Program - The EA indicates the Army would pursue specific, identified site access and local road improvements through the Defense Access Road program. Costs for the identified road improvements range from \$5.2 million for the Victory Center to \$19.0 million for the GISA warehouse. Of concern is whether any of the recommended road improvements would qualify under the Defense Access Road program. We strongly recommend the transportation mitigation improvements outlined in the EA be submitted to the Defense Access Road program staff to determine their eligibility prior to the selection of the Washington Headquarters Services site.

• Cumulative Impacts - The EA indicates that if the Main Post or the Engineer Proving Grounds is selected, no further environmental documentation would be required since these sites were documented in the June 2007 Final Environmental Impact Statement. We disagree with that assessment. None of the four land use alternatives presented in the Final Environmental Impact Statement studied the cumulative impacts of placing the National Geospatial Intelligence Agency on the Engineer Proving Grounds and the Washington Headquarters Services on Main Post under the same land use scenario. Therefore, we would request additional transportation analyses, documentation, mitigation and cost estimates be performed if the Main Post is selected as the future site of the Washington Headquarters Services.

• Technical Analyses - Additional traffic impact analyses should be performed, particularly for the Victory Center and Mark Center alternatives. The developer funded studies only analyzed the impacts to the immediate local roadway networks. These studies should be expanded to determine the impacts of the Washington Headquarters Services development on surrounding local and regional roadways.

Fort Belvoir BRAC

July 30, 2008

Page 3

Overall, selection of the future location of the Washington Headquarters Services could have a profound impact on the Northern Virginia region. Choosing a site that has limited transit access, lacks local support, and negatively impacts local and regional transportation infrastructure is not in the best interest of the United States Army or the citizens of the Commonwealth. The Army should secure transportation funding for the mitigating projects listed in the EA prior to making this important land use decision. We look forward to working with the Army to determine the most appropriate location for the Washington Headquarters Services and mitigating the transportation impacts of that decision.

Sincerely,

Pierce R. Homer

Copy: The Honorable Gerald E. Connolly
The Honorable William D. Euille
The Honorable Keith E. Eastin
The Honorable Patrick O. Gottschalk
Mr. David S. Ekern
Mr. Matthew O. Tucker



COMMONWEALTH of VIRGINIA
DEPARTMENT OF CONSERVATION AND RECREATION

203 Governor Street
Richmond, Virginia 23219-2010
(804) 786-6124

MEMORANDUM

DATE: August 11, 2008
TO: John Fisher, DEQ
FROM: Robert S. Munson, Planning Bureau Manager, DCR-DPRR 
SUBJECT: DEQ 08-154F: Fort Belvoir BRAC Recommendation 133 - Fairfax County and City of Alexandria, Virginia

Division of Natural Heritage

The Department of Conservation and Recreation's Division of Natural Heritage (DCR) has searched its Biotics Data System for occurrences of natural heritage resources from the area outlined on the submitted map. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.

Biotics documents the presence of natural heritage resources in the project area. However, due to the scope of the activity and the distance to the resources, we do not anticipate that this project will adversely impact these natural heritage resources.

In addition, our files do not indicate the presence of any State Natural Area Preserves under DCR's jurisdiction in the project vicinity.

Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the Virginia Department of Conservation and Recreation (DCR), DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species. The current activity will not affect any documented state-listed plants or insects.

New and updated information is continually added to Biotics. Please contact DCR for an update on this natural heritage information if a significant amount of time passes before it is utilized.

The Virginia Department of Game and Inland Fisheries maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters, that may contain information not documented in this letter. Their database may be accessed from www.dgif.virginia.gov/wildlifeinfo_map/index.html, or contact Shirl Dressler at (804) 367-6913.

Division of Chesapeake Bay Local Assistance

The Chesapeake Bay Preservation Act, as locally implemented through the Fairfax County *Chesapeake Bay Preservation Ordinance* and the City of Alexandria *Environmental Management Ordinance*, strictly controls land disturbance in environmentally sensitive lands. These lands, referred to as Resource Management Areas (RMAs), are subject to the jurisdiction-wide performance criteria for development activities in Fairfax County and the City of Alexandria, and to general performance criteria found in §9 VAC 10-20-120 of the *Chesapeake Bay Preservation Area Designation and Management Regulations*, including requirements to minimize land disturbance, preserve indigenous vegetation, and minimize post-development impervious surfaces. Additionally stormwater management criteria consistent with water quality protection provisions (§4 VAC 50-60-60 et seq.) of the *Virginia Stormwater Management Regulations* (§ 4 VAC 50-60) shall be satisfied, and for land disturbance over 2,500 square feet, the project must comply with the requirements of the *Virginia Erosion & Sediment Control Handbook*, Third Edition, 1992.

A review of the Fairfax County Chesapeake Bay Preservation Areas map shows that the proposed project lies within the County's jurisdiction-wide RMA and, accordingly, the proposed development activities must comply with the above-referenced performance criteria. As referenced in the FEA documents submitted, potential development/redevelopment at the Springfield Mall or at the GSA site south of the Franconia/Springfield Parkway will not impact any Resource Protection Areas (RPAs) in Fairfax County

Relative to the potential development of the Victory Center site in Alexandria, page C-7 of the FEA indicates that "Plans are in place to offset the RPA overlap on the Victory Center with low impact development (LID) practices." If the Victory Center site is chosen for the final BRAC 133 proposal, please note the following:

§9 VAC 10-20-80 B 5 of the *Chesapeake Bay Preservation Area Designation and Management Regulations* mandates that Resource Protection Areas shall include "A buffer area not less than 100 feet in width located adjacent to and landward of all "water bodies with perennial flow that have an intrinsic water quality value due to the ecological and biological processes they perform or are sensitive to impacts which may cause significant degradation to the quality of state waters."

§9 VAC 10-20-130-2 of the *Chesapeake Bay Preservation Area Designation and Management Regulations* the only land disturbing activities allowed in Resource Protection areas are those associated with: (a) the construction of water wells, (b) the construction of passive recreation facilities such as boardwalks, trails and pathways; and (c) historic preservation and archeological activities.

Pursuant to the Coastal Zone Management Act of 1972, as amended, Federal activities affecting Virginia's coastal resources or coastal uses must be consistent with the Virginia Coastal Resources Management Program (VCRMP)(section 307(c)(1) of the Act and the *Federal Consistency Regulations*, 15 CFR Part 930, sub-part C). The 1998 *Chesapeake Ecosystem Unified Plan* requires the signatories, including the Department of the Army, to fully cooperate with local and state governments in carrying out voluntary and mandatory actions to comply with the management of stormwater. All signatory agencies also committed to encouraging construction design that a) minimizes natural area loss on new and rehabilitated federal facilities; b) adopts low impact development and best management technologies for storm water, sediment and erosion control, and reduces impervious surfaces; and c) considers the *Conservation Landscaping and BayScapes Guide for Federal Land Managers*. In addition, the

Chesapeake 2000 Agreement committed the signatory agencies to a number of sound land use and stormwater quality controls. The signatories additionally committed the agencies to lead by example with respect to controlling nutrient, sediment and chemical contaminant runoff from government properties. In December 2001, the Executive Council of the Chesapeake Bay Program issued *Directive No. 01-1: Managing Storm Water on State, Federal and District-owned Lands and Facilities*, which includes specific commitments for agencies to lead by example with respect to stormwater control.

Provided adherence to the above requirements, we concur that the project would be consistent with the *Chesapeake Bay Preservation Area Designation and Management Regulations*.

Division of Soil and Water Conservation

The U.S. Army and their authorized agents conducting regulated land disturbing activities on private and public lands in the state must comply with the Virginia Erosion and Sediment Control Law and Regulations (VESCL&R), Virginia Stormwater Management Law and Regulations including coverage under the general permit for stormwater discharge from construction activities, and other applicable federal nonpoint source pollution mandates (e.g. Clean Water Act-Section 313, Federal Consistency under the Coastal Zone Management Act). Clearing and grading activities, installation of staging areas, parking lots, roads, buildings, utilities, borrow areas, soil stockpiles, and related land-disturbance activities that result in the land-disturbance of greater than 2,500 square feet would be regulated by VESCL&R. Accordingly, the U.S. Army must prepare and implement erosion and sediment control (ESC) plan to ensure compliance with state law and regulations. The ESC plan is submitted to the DCR Regional Office that serves the area where the project is located for review for compliance. U.S. Army is ultimately responsible for achieving project compliance through oversight of on site contractors, regular field inspection, prompt action against non-compliant sites, and other mechanisms consistent with agency policy. [Reference: VESCL §10.1-567;].

General Permit for Discharges of Stormwater from Construction Activities:

The operator or owner of construction activities involving land disturbing activities equal to or greater than one acre are required to register for coverage under the General Permit for Discharges of Stormwater from Construction Activities and develop a project specific stormwater pollution prevention plan (SWPPP). Construction activities requiring registration also includes the land-disturbance of less than one acre of total land area that is part of a larger common plan of development or sale if the larger common plan of development will ultimately disturb equal to or greater than one acre. The SWPPP must be prepared prior to submission of the registration statement for coverage under the general permit and the SWPPP must address water quality and quantity in accordance with the Virginia Stormwater Management Program (VSMP) Permit Regulations. General information and registration forms for the General Permit are available on DCR's website at http://www.dcr.virginia.gov/soil_&_water/vsmp.shtml [Reference: Virginia Stormwater Management Law Act §10.1-603.1 et seq.; VSMP Permit Regulations §4VAC-50 et seq.]

General Permit for Discharges of Stormwater from Construction Activities in CBPA:

The operator or owner of construction activities involving land disturbing activities equal to or greater than 2,500 square feet in areas designated as subject to the Chesapeake Bay Preservation Area Designation and Management Regulations adopted pursuant to the Chesapeake Bay Preservation Act are required to register for coverage under the General Permit for Discharges of Stormwater from Construction Activities and develop a project specific stormwater pollution prevention plan (SWPPP). The SWPPP must be prepared prior to submission of the registration statement for coverage under the general permit and the SWPPP must address water quality and quantity in accordance with the Virginia Stormwater Management Program (VSMP) Permit Regulations. General information and registration forms for the General Permit are available on DCR's website at

http://www.dcr.virginia.gov/soil_&_water/vsmp.shtml

[Reference: Virginia Stormwater Management Law Act §10.1-603.1 et seq.; VSMP Permit Regulations §4VAC-50 et seq.]

The remaining DCR divisions have no comments regarding the scope of this project. Thank you for the opportunity to comment.

Fisher,John

From: Beasley, Trisha
Sent: Thursday, August 28, 2008 11:57 AM
To: Fisher, John
Cc: Hartshorn, David
Subject: CD#08-154F

NRO comments regarding the Implementation of 2005 Base Realignment and Closure Recommendation 133 (Washington HQ Services), Ft. Belvoir project are as follows:

Virginia Water Protection Permit (VWPP) Program – the proposal is to provide administrative space for BRAC 133 at Fort Belvoir. The Environmental Assessment Report states that no surface water (streams, wetlands and/or open water) are located within the three proposed sites, except for a concrete lined channel which drains into a storm water management pond.

The project manager should contact the VWP Permitting Manager at Northern Regional Office of DEQ to verify whether the concrete lined channel is surface water regulated under the VWPP Program Regulation 9 VAC 25-210. If the feature is a surface water, authorization under the VWP Program may be required prior to commencing construction activities that may impact the feature.

Air Compliance –The project manager is reminded that during construction phase of this project, that the project is subject to the Fugitive Dust/Fugitive Emissions Rule 9 VAC 5-50-60 through 9 VAC 5-50-120; and that should any open burning or use of special incineration devices be employed in the disposal of land clearing debris during construction, that the operation would be subject to the Open Burning Rule 9 VAC 5-40-5600 through 9 VAC 5-40-5645. In addition, should the project install fuel burning equipment (Boilers, Generators, etc. . .), or other air pollution emitting equipment, the project may be subject to 9 VAC 5-80, Article 6, Permits for New and Modified sources and as such should contact the Air Permitting Manager DEQ-NRO prior to construction and operation of fuel burning or other air pollution emitting equipment for a permitting determination.

Trisha M. Beasley
Department of Environmental Quality
Northern Virginia Regional Office
Virginia Water Protection Permit Program
13901 Crown Court
Woodbridge, VA 22193

Phone: 703-583-3940
Fax: 703-583-3841

DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF AIR PROGRAM COORDINATION

ENVIRONMENTAL REVIEW COMMENTS APPLICABLE TO AIR QUALITY

TO: John E. Fisher

DEQ - OEIA PROJECT NUMBER: 08 - 154F

PROJECT TYPE: STATE EA / EIR FEDERAL EA / EIS SCC

CONSISTENCY DETERMINATION

PROJECT TITLE: IMPLEMENTATION OF 2005 BASE REALIGNMENT AND CLOSURE
RECOMMENDATION 133 (WASHINGTON HQ SERVICES), FT. BELVOIR

DEQ Office of Environmental
Impact Review
RECEIVED
AUG 1 2008

PROJECT SPONSOR: DEPARTMENT OF DEFENSE / U. S. ARMY

PROJECT LOCATION: OZONE NON ATTAINMENT AREA

REGULATORY REQUIREMENTS MAY BE APPLICABLE TO: CONSTRUCTION
 OPERATION

STATE AIR POLLUTION CONTROL BOARD REGULATIONS THAT MAY APPLY:

1. 9 VAC 5-40-5200 C & 9 VAC 5-40-5220 E - STAGE I
2. 9 VAC 5-40-5200 C & 9 VAC 5-40-5220 F - STAGE II Vapor Recovery
3. 9 VAC 5-40-5490 et seq. - Asphalt Paving operations
4. 9 VAC 5-40-5600 et seq. - Open Burning
5. 9 VAC 5-50-60 et seq. Fugitive Dust Emissions
6. 9 VAC 5-50-130 et seq. - Odorous Emissions; Applicable to _____
7. 9 VAC 5-50-160 et seq. - Standards of Performance for Toxic Pollutants
8. 9 VAC 5-50-400 Subpart _____ Standards of Performance for New Stationary Sources, designates standards of performance for the _____
9. 9 VAC 5-80-10 et seq. of the regulations - Permits for Stationary Sources
10. 9 VAC 5-80-1700 et seq. Of the regulations - Major or Modified Sources located in PSD areas. This rule may be applicable to the _____
11. 9 VAC 5-80-2000 et seq. of the regulations - New and modified sources located in non-attainment areas
12. 9 VAC 5-80-800 et seq. Of the regulations - Operating Permits and exemptions. This rule may be applicable to _____

COMMENTS SPECIFIC TO THE PROJECT:

Being in an area of ozone non-attainment, all precautions are necessary to restrict the emissions of volatile organic compounds (VOC) and oxides of nitrogen (NO_x) during construction.

K. S. Narasimhan

(Kotur S. Narasimhan)
Office of Air Data Analysis

DATE: August 15, 2008



MEMORANDUM

TO: John Fisher, Environmental Program Planner
FROM: *PK*
Paul Kohler, Waste Division Environmental Review Coordinator
DATE: August 11, 2008
COPIES: Sanjay Thirunagari, Waste Division Environmental Review Manager; file
SUBJECT: Environmental Impact Report: Implementation of 2005 Base realignment and Closure Recommendation 133 (Washington HQ Services), Ft. Belvoir; 08-154F

The Waste Division has completed its review of the Environmental Impact report for the Implementation of 2005 Base realignment and Closure Recommendation 133 (Washington HQ Services), Ft. Belvoir project at Fort Belvoir and other locations in Northern Virginia. We have the following comments concerning the waste issues associated with this project:

Both solid and hazardous waste issues were addressed in the report. Although the report did not provide a search list of waste-related data base, the text implies that Federal sources were searched. A GIS database search did not reveal any waste sites within a half mile radius that would impact or be impacted by the subject site. The Waste Division staff performed a cursory review of its data files and determined that there are several hazardous waste, solid waste, formerly used defense sites (FUDS), and voluntary remediation (VRP) projects located within the same zip code(s) as the subject site(s). These are as follows.

HW
US GENERAL SERVICES ADMINISTRATION, VA4470039336 LQG (ACTIVE)

SW
22304 Covanta Alexandria Arlington Incorporated, SWP 435, Energy Recovery/Incineration Facility
22304 FCR Incorporated, PBR 088, Materials Recovery Facility
22304 Inova Alexandria Hospital, PBR 202, RMW Steam Sterilizer
22304 Morgan Distribution, PBR 247, RMW Steam Sterilizer

FUDS
C03VA0176, VA9799F1651, ARLINGTON HALL TRNG, ALEXANDRIA
C03VA0508, VA9799F1710, CAMERON STA, ALEXANDRIA

VRP

VRP00247, Landmark Professional Center, Certificate Issued

VRP00347, Sparkle Dry Cleaners, Certificate Issued

VRP00260, Fairfax Lumber & Millwork Company, Inc., Enrolled in Program

VRP00493, Midtown Springfield-Hotel Parcel, Eligibility Pending

VRP00359, Park Cleaners, Certificate Issued

The following websites may prove helpful in locating additional information for these identification numbers: <http://www.epa.gov/superfund/sites/cursites/index.htm> or http://oaspub.epa.gov/enviro/ef_home2.waste. Wade Smith of DEQ's Federal Facilities Program has been contacted for his review of this determination and he replied in a separate memo (attached).

Any soil that is suspected of contamination or wastes that are generated during construction-related activities must be tested and disposed of in accordance with applicable Federal, State, and local laws and regulations. Some of the applicable state laws and regulations are: Virginia Waste Management Act, Code of Virginia Section 10.1-1400 *et seq.*; Virginia Hazardous Waste Management Regulations (VHWMR) (9VAC 20-60); Virginia Solid Waste Management Regulations (VSWMR) (9VAC 20-80); Virginia Regulations for the Transportation of Hazardous Materials (9VAC 20-110). Some of the applicable Federal laws and regulations are: the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Section 6901 *et seq.*, and the applicable regulations contained in Title 40 of the Code of Federal Regulations; and the U.S. Department of Transportation Rules for Transportation of Hazardous materials, 49 CFR Part 107.

Also, all structures being demolished/renovated/ removed should be checked for asbestos-containing materials (ACM) and lead-based paint prior to demolition. If ACM or LBP are found, in addition to the federal waste-related regulations mentioned above, State regulations 9VAC 20-80-640 for ACM and 9VAC 20-60-261 for LBP must be followed.

Please note that DEQ encourages all construction projects and facilities to implement pollution prevention principles, including the reduction, reuse, and recycling of all solid wastes generated. All generation of hazardous wastes should be minimized and handled appropriately.

If you have any questions or need further information, please contact Paul Kohler at (804) 698-4208.

Fisher,John

From: Smith,Wade
Sent: Tuesday, July 29, 2008 10:35 AM
To: Fisher,John
Cc: Kohler,Paul; Willis,Durwood
Subject: Fort Belvoir: EA - BRAC Recommendation 133

The 2007 Fort Belvoir BRAC EIS evaluated proposals for facilities for BRAC 133 at Fort Belvoir's EPG and Main Post. The DEQ provided comments on the Draft BRAC EIS on March 19, 2007. The BRAC 133 EA, received July 25, 2008, includes evaluations of three additional sites (the GSA Site, Victory Center, and Mark Center) not included in the 2007 BRAC EIS. The GSA Site, Victory Center, and Mark Center are not located within Fort Belvoir's EPG or Main Post boundaries, so the DEQ's Office of Remediation Programs has no comments on the BRAC 133 EA. Please let me know if you have any questions.
Sincerely,
wade

Wade M. Smith
Remediation Project Manager
Virginia Department of Environmental Quality
Office of Remediation Programs
Phone: (804) 698-4125
Fax: (804) 698-4234
wmsmith@deq.virginia.gov

If you cannot meet the deadline, please notify JOHN FISHER at 804/698-4339 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

REVIEW INSTRUCTIONS:

- A. Please review the document carefully. If the proposal has been reviewed earlier (i.e. if the document is a federal Final EIS or a state supplement), please consider whether your earlier comments have been adequately addressed.
- B. Prepare your agency's comments in a form which would be acceptable for responding directly to a project proponent agency.
- C. Use your agency stationery or the space below for your comments. **IF YOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.**

Please return your comments to:

MR. JOHN E. FISHER
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX #804/698-4319
jefisher@deq.virginia.gov



JOHN E. FISHER
ENVIRONMENTAL PROGRAM PLANNER

COMMENTS

Please be advised that the Marine Resources Commission, pursuant to Section 28.2-1204 of the Code of Virginia, has jurisdiction over any encroachments in, on, or over any State-owned rivers, streams, or creeks in the Commonwealth. Accordingly, if any portion of the subject projects involves any encroachments channelward of ordinary high water along natural rivers and streams, a permit may be required from our agency.

(signed) J. J. J. J. (date) 8/20/08
(title) Environmental Engineer
(agency) VMRC

Fisher, John

From: Ewing, Amy (DGIF)
Sent: Friday, August 15, 2008 1:09 PM
To: Fisher, John
Subject: ESSLog# 24464_08-154F_BRAC Recommendation 133-Ft. Belvoir

We have reviewed the ES for the subject project that proposes the relocation of 6,409 personnel to Ft. Belvoir. To achieve this, construction, maintenance, management and/or reconstruction of facilities will occur. There have been three action alternatives identified: Alternative A, the GSA site in Springfield; Alternative B, the Victory Center site in Alexandria; and Alternative C, the Mark Center in Alexandria.

We have reviewed the alternative sites for impacts upon wildlife resources under our jurisdiction. According to our records, the Alternative A site is located within close proximity to Accotink Creek which has been designated a Confirmed Anadromous Fish Use Area. The Alternative B and Alternative C sites are located within close proximity of Cameron Run which has been designated a Potential Anadromous Fish Use Area. However, based on the proposed activities, it does not appear that this waters, or their tributaries, will be adversely impacted by the project.

Overall, we prefer Alternatives A and B to Alternative C. Alternative C, of the three, currently retains some wildlife habitat on site and on adjacent lands. We would prefer the reconstruction of currently developed areas, as are Alternatives A and B, to the development of currently undeveloped lands.

We recommend that the applicant avoid and minimize impacts to undisturbed forest, wetlands, and streams to the fullest extent practicable. We recommend maintaining undisturbed wooded buffers of at least 100 feet in width around all on-site wetlands and on both sides of all perennial and intermittent streams. We recommend maintaining wooded lots to the fullest extent possible. We recommend that the stormwater controls for this project be designed to replicate and maintain the hydrographic condition of the site prior to the change in landscape. This should include, but not be limited to, utilizing bioretention areas, and minimizing the use of curb and gutter in favor of grassed swales. Bioretention areas (also called rain gardens) and grass swales are components of Low Impact Development (LID). They are designed to capture stormwater runoff as close to the source as possible and allow it to slowly infiltrate into the surrounding soil. They benefit natural resources by filtering pollutants and decreasing downstream runoff volumes.

Assuming strict erosion and sediment controls are in place during ground disturbance, we find this project consistent with the Fisheries Management Section of the CEMA.

Thank you.

Amy M. Ewing
Environmental Services Biologist
Virginia Dept. of Game and Inland Fisheries
4010 West Broad Street
Richmond, VA 23230
804-367-2211
amy.ewing@dgif.virginia.gov

Fisher, John

From: Rucker, William (VDH)
Sent: Friday, August 15, 2008 9:35 AM
To: Pinion, Anne; Fisher, John; Wellman, Julia
Subject: OEIR-Environmental Review Request

Recent projects which have been reviewed for proximity to public drinking water *sources* (groundwater wells and surface water intakes) are summarized in the attached table. Potential impacts to public water distribution systems or sanitary sewage collection systems must be verified by the local utility.

W.C. Rucker, Jr
Office Services Assistant
Virginia Department of Health
Office of Drinking Water
109 Governor Street
Richmond, Virginia 23219
William.Rucker@vdh.virginia.gov
804-864-7495 Office

DCO OFFICE OF ENVIRONMENTAL IMPACT REVIEW

PROJECT #	PROJECT TITLE	SPONSOR	TYPE	REVIEWER	RECIPIENT	LOCALITY	PROXIMITY TO WELL OR INTAKE	DATE RECEIVED	REVIEW DEADLINE	RESPONSE DATE
06-1548	Implementation of 2025 Bass Realignment and Closure	DDA/USA	EA	WCR	Jeffrey	Fairfax County City of Alexandria	0.10-40.53 S304 077 10.32 46% at 421' No GW source within 1 mile. No SW intake within 5 miles.	7/25/2008	8/12/2008	8/15/2008
06-1625	Edis Center	DMU	EIR	WCR	Jeffrey	Fairfax County	032.24 68.314 077 33.41 14% at 299'. 3-GW sources within 1 mile (Five Forks Center, Potomac/Dan Clay Ltd No 17). 1 SW intake within 5 miles (Charlestown C&D Central Water System).	8/7/2008	8/22/2008	8/15/2008
06-1828	Charlestown Veterans' Diversions Center	MDOC	EIR	WCH	esposito	Charlestown Co	077 14.20 974 076 31 17 20% at 46'. No GW source within 1 mile. 1 SW intake within 5 miles (Newport News City C&D).	8/7/2008	8/30/2008	8/15/2008
06-1955	Construct Yankee Mountain, Yankee Victory Center	JV/PA	EIR	WCH	Jeffrey	York Co	038 07 30 074 077 10 23 70% at 189'. No GW source within 1 mile. No SW intake within 5 miles.	8/8/2008	9/3/2008	8/15/2008
06-1976	Constructing and Operating an Expressway Ordinance	DDA/USA	EA	WCH	Jeffrey	Caroline Co		8/12/2008	8/31/2008	8/15/2008

If you cannot meet the deadline, please notify JOHN FISHER at 804/698-4339 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

REVIEW INSTRUCTIONS:

- A. Please review the document carefully. If the proposal has been reviewed earlier (i.e. if the document is a federal Final EIS or a state supplement), please consider whether your earlier comments have been adequately addressed.
- B. Prepare your agency's comments in a form which would be acceptable for responding directly to a project proponent agency.
- C. Use your agency stationery or the space below for your comments. **IF YOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.**

Please return your comments to:

MR. JOHN E. FISHER
 DEPARTMENT OF ENVIRONMENTAL QUALITY
 OFFICE OF ENVIRONMENTAL IMPACT REVIEW
 629 EAST MAIN STREET, SIXTH FLOOR
 RICHMOND, VA 23219
 FAX #804/698-4319
 jefisher@deq.virginia.gov



 JOHN E. FISHER
 ENVIRONMENTAL PROGRAM PLANNER

COMMENTS

The Army is in consultation w/ DHR regarding this project pursuant to Section 106 of the National Historic Preservation Act. We anticipate that this consultation directly w/ the Army will continue.

(signed) *Debra Helman* (date) 14 APR 08
 (title) *Manager ORC*
 (agency) *DHR (2006-0820)*

Fisher, John

From: Mark.Jinks@alexandriava.gov
Sent: Thursday, August 28, 2008 12:44 PM
To: Fisher, John
Cc: Jim.Hartmann@alexandriava.gov; William.Skrabak@alexandriava.gov
Subject: Fort Belvoir BRAC 133 EA Comments from the City of Alexandria



comments final EA
BRAC 133.pdf...

Dear Mr. Fisher:

The City Manager has asked that I respond to your email. We appreciate DEQ seeking our input and recognizing the importance this project and its impact on the City of Alexandria. Attached you will find our EA comments that have been previously provided to the Army. As you will see we are supportive of the EA's conclusions in regard to the Victory Center and Mark Center sites, and had relatively few differences with the conclusions that the EA reached. Both of these projects (albeit now modified to some degree) have already been through the City's land use processes and received City approvals.

If you have any questions, please let me know.

Mark Jinks
Deputy City Manager
City of Alexandria
703.838.4300

(See attached file: comments final EA BRAC 133.pdf)



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

RECEIVED

AUG 13 2008

200-0000 of Environmental
Department

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.

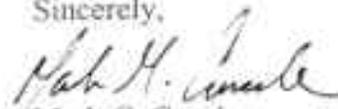
Fort Belvoir BRAC

August 8, 2008

Page 2 of 2

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 jobs 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



OFFICE OF THE CITY MANAGER

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August 13, 2008

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

Dear Sir or Madam:

This letter responds to the opportunity for the stakeholders and the public to comment on the final Environmental Assessment (EA) and draft Finding of No Significant Impact (FONSI) in regard to BRAC 133 and its planned relocation of the Department of Defense's Washington Headquarters Service of up to 1.8 million square feet of office space to one of three short-listed sites in Northern Virginia. The City of Alexandria will limit our comments to the two sites in the City of Alexandria, sites we know well. We do not think it productive to the EA process to provide negative comments on the GSA site, which is not in our jurisdiction.

The City of Alexandria supports the location of the Washington Headquarters Service (WHS) to either the Mark Winkler or to the Victory Center site. Both sites are quality locations which can well meet WHS requirements now and far into the future. The City of Alexandria has been home to federal operations for over 200 years (and, if one surveyed federal users, you would find they are very satisfied with their location within the City). Most recently, the relocation of the U.S. Patent and Trademark Office to Alexandria (which required the planning and construction of 2.5 million square feet of office space within contractual time constraints) was managed as a partnership between the City, the developer, and the federal government, which enabled the facility to be constructed on time and within budget.

The following comments on the key EA Resource Areas are provided:

Land Use: Both the Victory Center site and the Mark Center site have been subject to in-depth land use consideration processes, and the approved zoning ordinance contemplates significant office development in those areas. The Alexandria City Council has supported and supports the development of these two sites with the approximate 1.8 million square feet of office space as contemplated in both the WHS proposals. In regard to future expansion capability for WHS, or related private office use: (1) the Victory Center is surrounded by low density flex office/warehouse space which the City contemplates being able to be redeveloped at much

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Air Quality: The EA adequately addresses air quality and its conclusion of *de minimis* air quality impacts at both sites in Alexandria. This is the logical conclusion since this is a relocation project from adjacent Arlington County.

Construction emissions at the two Alexandria sites will be minimal as there are no demolitions of existing buildings required.

Water and Biological Resources: Both Alexandria sites have the required land use and storm water approvals, and the developers plan on ensuring that storm water management reflects best practices. As a result, any concerns about major adverse runoff volumes and velocities are unfounded. In the case of the Victory Center site, the existing old development includes a nearly impervious surface for the entire site. Anything on that site would be better than a No Action alternative. The new development at the Victory Center will reduce the impervious coverage and improve substantially the handling of storm water runoff. This would improve the conditions on the adjacent Resource Protection Area (RPA). The Mark Center, whose master plan with a large, dedicated nature preserve makes it one of the pioneers in ecologically sensitive development, has the necessary storm water management and water quality control measures in place. With the major 44-acre nature preserve proffered by the Mark Winkler Company, the City accepted the replacement of one of the wooded areas with future office development.

Socioeconomics: The EA is silent on the impact on affordable housing of the Mark Winkler and the Victory Center sites. The creation of 6,409 jobs at either of these two housing sites would tend to increase rental and ownership housing demand to some degree, and therefore reduce the supply of affordable housing to some extent. The WHS would be a positive economic addition to the City, as it will help mitigate much of the effect of the loss of some 7,200 Department of Defense jobs that have been, or will be, transferred out of the City as part of the BRAC process.

Utilities: The City of Alexandria concurs in the conclusion that the Victory Center and the Mark Winkler sites both have water, electric, natural gas, sanitary sewer access and capacity which will be able to more than adequately meet the needs of the proposed WHS facility.

Public Safety: Because of significant additional planned development and redevelopment in the West End of Alexandria, the City plans at some time in the future to construct and equip a new fire station to serve the West End of the City, where both the Victory Center and the Mark Center sites are located. The City has reserved a parcel of land on Eisenhower Avenue for this purpose.

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In conclusion, the City believes that overall the EA report and conclusions are sound and the Finding of No Significant Impact in regard to the Mark Center and the Victory Center WHS proposals is correct. If the City can be of any assistance in further clarification of our comments on the EA, please contact us.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Jinks', is written over a horizontal line.

Mark Jinks
Deputy City Manager

cc: The Honorable Mayor and Members of City Council
Jim Hartmann, City Manager
Faroll Harner, Director, Planning & Zoning
Tom Culpepper, Deputy Director, Transportation & Environmental Services
Stephanie Landrum, Senior Vice President,
Alexandria Economic Development Partnership

Fort Belvoir BRAC
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higher densities to meet substantial additional office demand, and (2) the Mark Center site has approximately 1.4 million square feet of existing office space which could be made available to meet future office demands.

Transportation: When the Victory Center site and the Mark Winkler Center sites were considered by the City, transportation studies were undertaken in order to determine how the needed road capacity compared with what capacity was planned or contemplated. While the Virginia Department of Transportation believes that additional traffic analyses of these two sites is warranted, the City is satisfied that the prior analyses which have met the City's rigorous standards sufficiently considered the impact of a WHS-sized facility on local roads. These studies have been recently updated. With the adjacency of these sites to the interstate highways (I-95 and I-395), which are both being improved, it is difficult to see how further studies are needed beyond what VDOT has already undertaken.

Because the WHS site is a relocation of employees, many of whom already travel the I-95 and I-395 corridors, we agree with the conclusion of the EA that the dissipation of the traffic to either of the Alexandria sites is such that the impact to the regional roadway network is manageable. In fact, the relocation of the WHS represents a major opportunity to reduce single occupancy vehicle (SOV) trips. Finally, the density of proposed office development at both sites in Alexandria is consistent with the Metropolitan Washington Council of Governments transportation modeling, which assumed a density of job growth similar to the WHS projected 6,409 employees.

The City is also in the initial stages of implementing a planned doubling of the service and capacity of our City-sponsored DASH bus system. We have started construction of a new DASH bus maintenance facility, which is the first step in this process. This expansion will improve the connectivity of these two sites with the rest of the City, as well as to the Metrorail system.

We fully understand the need for all of the local road infrastructure to be in place by September 15, 2011 (the legislatively mandated BRAC deadline), which is the time WHS needs to be able to move to their new offices at whatever site is selected. Only one of the two Alexandria sites will require additional road capacity to be constructed, and that can occur by the BRAC deadline date.

In the case of the **Victory Center** site, sufficient existing roadway capacity already is in place (Eisenhower is a four-lane avenue with significant underutilized road capacity). No new roadway construction will be needed with the Victory Center site, and therefore the site does not require any Defense Access Roads funding. Also this site is within walking distance of the Van Dorn Metrorail station (although we understand that the adjacency to a Metrorail site has been eliminated as a requirement). The Van Dorn Street interchange with I-95 is nearby. Eisenhower

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Avenue is served by three exits from I-95 (Telegraph, Clermont and Van Dorn), there is a new exit being constructed (Mill Road), and major improvements are underway at one exit (Telegraph). Vehicles can also access the site from Van Dorn by using the I-395 Duke Street or Edsall Road exits to reach Van Dorn.

While the Victory Center site does not have VRE access, VRE currently runs on tracks near the Victory Center site. If this site is selected for WHS, the City would study the feasibility of locating a VRE platform behind the Victory Center site (Manassas line) or adjacent to the Van Dorn Metrorail station (Fredericksburg line).

In addition to these transportation improvements related to the Victory Center site, the City has recently adopted a long-range Master Transportation Plan that contemplates Bus Rapid Transit (BRT) service on Van Dorn Street and Eisenhower Avenue. Recent agreements in regard to the HOT lanes on I-395 include the funding of a significant increase in transit service in the Van Dorn corridor in both Fairfax County and Alexandria.

The Victory Center would also have a Transportation Management Plan (TMP) in place that could accommodate the targeted 40% trip reduction level, with the adjacent Metrorail access being a major component of trip reduction.

In the case of the **Mark Center**, traffic studies undertaken when the City approved the Mark Center office density carefully determined what roadway improvements would be necessary. This includes the widening of Seminary Road and the expansion of the turning capacity from Seminary Road into the Mark Center site. With these improvements, which are to be made at developer's expense, City staff is comfortable that sufficient capacity will be created by the proposed and developer-agreed-to improvements and that no additional transportation studies are warranted. Since Duke Realty is funding these road improvements, this site does not require any Defense Access Roads funding.

The Mark Center can accommodate the desired 40% level of trip reduction by using existing TMP measures, and by expanding those measures. The Mark Center land use approvals previously granted by the City require substantial TMP measures which would be required to be expanded if WHS locates to the Mark Center site. The TMP measures include shuttle service, the City-operated DASH bus system, Metrobus, and the proposed governmental shuttle service.

The City's recently adopted long-range Master Transportation Plan includes a Bus Rapid Transit (BRT) corridor on Beauregard Street, which is a short walk from the proposed WHS site.