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COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL
IMPACT REVIEW

Office of the Governor

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Robert R. Hanner
Governor of the Commonwealth

July 30, 2008

Fort Belvoir BRAC
ATTN: BRAC 133 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 & IDM – 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/Franconia-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 GSA 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.

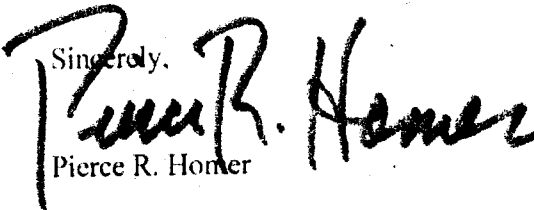
• Technical Analyses – Additional traffic impact analyses should be performed, particularly for the Victory Center and Mark Center alternatives. The developer funded studies only analyzed the impacts to the immediate local roadway networks. These studies should be expanded to determine the impacts of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

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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

L. Preston Bryant, Jr.
Secretary of Natural Resources



Joseph H. Maroon
Director

COMMONWEALTH of VIRGINIA
DEPARTMENT OF CONSERVATION AND RECREATION

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MEMORANDUM

DATE: August 11, 2008
TO: John Fisher, DEQ
FROM: Robert S. Munson, Planning Bureau Manager, DCR-DPRR *Robert S. Munson*
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.