



# Mason Neck Citizens Association

P.O. Box 612, Lorton, Virginia 22199

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May 1, 2007

Mr. Patrick McLaughlin  
Fort Belvoir Directorate of Public Works  
Environmental and Natural Resources Division  
Building 1442  
9430 Jackson Loop  
Fort Belvoir, Virginia, 22060-5116

Dear Mr. McLaughlin:

We are pleased to submit our comments on the Draft Environmental Impact Statement (DEIS) for Implementation of 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia. Our comments are representative of the communities at Mason Neck, VA, and we would hope, of the other communities in Northern Virginia.

Our environment on Mason Neck is one surrounded by the same waters fed by the drainage from Fort Belvoir. Most of our land is refuge, parklands, a truly magnificent historic plantation, and institutions such as BLM that are all dedicated to protection of our environment in many ways. We citizens of Mason Neck have grown to share the responsibility for our treasures with our institutional neighbors. This sort of protective drive makes us sensitive to the impact potential of processes introduced into our environmental neighborhood. With that kind of background, we will express our concerns about water quality, air quality, the chain reactions of environmental quality degradation generated by traffic congestion along corridors, historic preservation, and wildlife conservation, by commenting on the contents of the DEIS. Therefore, we feel it appropriate to request *Consulting Party Status*.

Additionally, we believe that one of the most important services that Department of the Army could provide to the Northern Virginia communities is to ***establish a community stakeholders group*** that is inclusive of businesses, churches, local schools, and the many citizens groups whom will experience the impacts and benefits of change brought to Fort Belvoir. This group should meet regularly and work in partnership with decision makers throughout every step of the

process and designate working groups to focus on cultural, biological, environmental quality, design and traffic aspects.

While our comments will be indicating disagreement with a number of elements in the Fort Belvoir BRAC DEIS as prepared, we also believe it to be significant that we found almost total agreement with the statements delivered by Senator Webb, Representative Davis, Representative Moran, Fairfax County Supervisors Connelly, Kauffman, and Hyland, former Mayor Ticer (Alexandria), and Mr. Pierce Homer, Virginia Secretary of Transportation at the DEIS Public Hearing on April 17, 2007. Accordingly, we wish to record herewith our support for those comments on the DEIS made by all of our governmental representatives.

In summary, we believe that many of the analyses in the DEIS are of extraordinary value to the community at large and to the implementation of BRAC at Fort Belvoir, especially those addressing economic impacts and transportation impacts. We would only emphasize here once again, the need of an EIS with important transportation implications, to reach beyond minimum NEPA requirements - to examine and report impacts at a scale commiserate with realistic regional influence. Further to that, we must observe that although the transportation impacts of BRAC are of great political and popular importance, a more publicly quiet environmental advocacy in these neighborhoods surrounding Fort Belvoir would wish to see the assessments of biological impacts and water quality impacts taken to a higher, even restorative, level of mitigation, including funding proposals. Further, as stated above, this continued analyses and planning should only take place in concert and through active involvement of a dedicated community stakeholders group.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Bruce Scott". The signature is stylized with a large, sweeping initial "B" and "S".

Bruce Scott  
President

## **Comments related to the Draft Environmental Impact Statement for Implementation of 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia**

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Our environment on Mason Neck is one surrounded by the same waters fed by the drainage from Fort Belvoir. Most of our land is refuge, parklands, a truly magnificent historic plantation, and institutions such as BLM that are all dedicated to protection of our environment in many ways. We citizens of Mason Neck have grown to share the responsibility for our treasures with our institutional neighbors. This sort of protective drive makes us sensitive to the impact potential of processes introduced into our environmental neighborhood. With that kind of background, we will express our concerns about water quality, air quality, the chain reactions of environmental quality degradation generated by traffic congestion along corridors, historic preservation, and wildlife conservation, by commenting on the contents of the DEIS. Therefore, we feel it appropriate to request *Consulting Party Status*.

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While our comments will be indicating disagreement with a number of elements in the Fort Belvoir BRAC DEIS as prepared, we also believe it to be significant that we found almost total agreement with the statements delivered by Senator Webb, Representative Davis, Representative Moran, Fairfax County Supervisors Connelly, Kauffman, and Hyland, former Mayor Ticer (Alexandria), and Mr. Pierce Homer, Virginia Secretary of Transportation at the DEIS Public Hearing on April 17, 2007. Accordingly, we wish to record herewith our support for those comments on the DEIS made by all of our governmental representatives.

In summary, we believe that many of the analyses in the DEIS are of extraordinary value to the community at large and to the implementation of BRAC at Fort Belvoir, especially those addressing economic impacts and transportation impacts. We would only emphasize here once again, the need of an EIS with important transportation implications, to reach beyond minimum NEPA requirements - to examine and report impacts at a scale commiserate with realistic regional influence. Further to that, we must observe that although the transportation impacts of BRAC are of great political and

popular importance, a more publicly quiet environmental advocacy in these neighborhoods surrounding Fort Belvoir would wish to see the assessments of biological impacts and water quality impacts taken to a higher, even restorative, level of mitigation, including funding proposals. Further, as stated above, this continued analyses and planning should only take place in concert and through active involvement of a dedicated community stakeholders group.

It is important to note that we are responding to elements of the Proposed Master Plan as well as to the DEIS.

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**Comments Keyed to content (*italics*) in the Executive Summary**

ES-6

*Similarly, the Satellite Campuses Alternative would be expected to result in the greatest disturbance to Chesapeake Bay RPAs (40 acres) and floodplain (3 acres), as compared with 14 acres of disturbed RPAs and 3 acres disturbed floodplain under the Preferred and City Center Alternatives, and 18 acres of disturbed RPAs and no disturbed floodplain under the Town Center Alternative.*

It is our understanding that RPAs may not be disturbed to any degree by any entity. Is the US Army exempt from state laws, in such that 14 acres may be disturbed? In our opinion, no RPA land should be eligible for disturbance.

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ES-6

*Increases in localized traffic near the installation, however, would result in minor increase in traffic congestion and subsequent long-term minor increases in localized carbon monoxide concentrations at nearby intersections.*

This is stretching our experienced reality to a considerable degree. The transportation analysts need to “ground truth” the traffic assumptions by traveling from Woodlawn (Fort Belvoir) to the Fairfax County Parkway, or even the reverse of that during the hours, of 3:00PM to 6:00PM. Morning traffic is notably worse now than it was merely a year ago, and many of us on Mason Neck leave at 6:00 am.

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ES.6.7 Biological Resources

*Long-term moderate and minor adverse effects would be expected by implementing any of the four land use plans and by implementing BRAC. These effects would pertain to vegetation; wildlife; and endangered, threatened, and sensitive species.*

*• Main Post. The primary areas of biological resources concentration on the Main Post are the Southwest Area, land bordering the shores of the South Post, and the Special Natural Areas (SNA). **All the alternatives would reduce vegetated areas on the post by a substantial amount and could indirectly affect vegetative communities and wildlife through habitat fragmentation and isolation and increased occurrences of invasive species, which would result in a loss of ecological integrity.***

These are issues and impacts of pronounced concern within the Mason Neck community. We cannot emphasize enough that degradation of the natural resources on Fort Belvoir can directly degrade our shared Pohick Creek watersheds and damage the integrity of the wildlife corridors

and habitats that our citizens, Commonwealth partners and federal partners on Mason Neck have worked for so long to protect. We regret that the proposed master plan is of such a large scope, that it is difficult for us to assess the major proposed development footprints for truly measurable impacts. Without subdivision of the overall Master Plan map into a set of larger scale maps, the modeling of impacts remains a statistical analysis that defies a relational comprehension of impacts. Certainly, our communities need the published visual tools at appropriate scales to enable informed discussion of sustainable development strategies in our environmental neighborhood.

• *EPG. Natural habitat on EPG has been re-establishing itself since the 1970s, when intensive training activities on EPG ceased. West of Accotink Creek, development has been minimal, and east of Accotink Creek, the developed areas have not been used intensively in recent years. Natural aspects of the area east of Accotink Creek—such as woody growth and the use of undisturbed open areas by breeding birds—have increased.*

We recommend that the master planning process contain language that will impose constraints on construction activities during the peak nesting season that includes March, April and May. Attendant mapping would necessarily limit constraints to the most sensitive habitat areas.

*The Preferred and City Center Alternatives have the greatest adverse effects on the biological resources on EPG because they have more project development in EPG, while the Town Center and Satellite Campuses Alternatives have less development occurring on EPG.*

*Overall, the City Center Alternative would have the greatest adverse effect on the biological resources of Fort Belvoir, followed by the Preferred Alternative. The Town Center and Satellite Campuses Alternatives would have the least impact on biological resources.*

Again, we revisit the case for including the GSA warehousing tract in the full evaluations of impacts on natural resources and transportation.

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ES-7

*For all the alternatives, the significant transportation effects would be limited to the entrance points and the immediately adjacent transportation facilities. These significant effects would disappear into the regional traffic flow within 3 to 5 miles of Fort Belvoir. While the alternatives differ somewhat in terms of the detailed extent and location of these effects, on a regional basis, beyond the 3- to 5-mile range, the effects become negligible for all alternatives.*

Transportation effects are more likely to impact several corridors, notably, I-95, Fairfax County Parkway, Route 123, and U.S. Route 1, in ranges up to 8 to 9 miles from EPG and Fort Belvoir at Route 1, in the north, south, and westerly directions before any disappearance of effects could be measurable. In our opinion, then, the transportation effects will not, with certainty, become negligible within 3 to 5 miles of Fort Belvoir.

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ES-8

*Order-of-magnitude costs for the mitigation actions are estimated to be as follows:*

- *Preferred Alternative, \$458 million*
- *Town Center, \$732 million*

- City Center, \$471 million
- Satellite Campuses, \$742 million

*For the Preferred and City Center Alternatives, the ability of transit to contribute to the mitigation is greater than for the other alternatives because these alternatives use sites that are closer to the regional rail network. Their locations make it easier to achieve the targeted 5 to 10 percent transit mode share goals.*

1. Does the estimated \$458 million (Preferred Alternative) estimate include necessary connection improvements to make rail links viable?
2. Does the estimated \$458 million include necessary costs to provide on-site bus service availability or subsidies?
3. Does the estimated \$458 million represent a financial commitment from DOD in order to implement Preferred Alternative, and if not a DOD commitment of funding, is the cost included as part of the net economic impact?
4. It appears from the ES and from Chapter 4, Affected Environment, that the estimated \$458 million is funding only the mitigation of transportation impacts that are contiguous to the Fort Belvoir development sites (Preferred Alternative). Please see comments on several details in Chapter 4, below.

In consideration of a holistic assessment of transportation impact mitigation, the reasonable DOD responsibility for mitigation costs can grow from the DEIS estimated \$458 million to an estimated range of \$700 million to \$900 million for improvements to I-95, Fairfax County Parkway, and Route 1.

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ES-9

*For all the alternatives, implementing the BRAC action would decrease both the number of vehicles and the total vehicle miles traveled (VMT) within the region. In turn, regional motor vehicle emissions would decrease. This decrease would be primarily due to a net reduction of approximately 1,700 personnel from the region. These are personnel leaving Fort Belvoir to areas outside the NCR. These BRAC-related reductions in emissions would constitute an ongoing net benefit to the region's air quality. Increases in localized traffic near the installation, however, would result in minor increase in traffic congestion and subsequent long-term minor increases in localized carbon monoxide concentrations at nearby intersections.*

It is difficult to imagine that a reduction of 1,700 personnel would offset an increase of 22,000 personnel to create a decrease in emissions for a net benefit to the region's air quality.

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ES-11

*The greatest potential expected increases in total nitrogen and total phosphorous pollutant loading to surface waters would be expected to occur under the Preferred Alternative and the City Center Alternative, with five sub-watersheds expected to increase their loads by more than 10 percent.*

Does the statement referring to increased loading as an impact suggest that no mitigation measures are planned? A 10% load would, in our opinion, exceed acceptable standards. If mitigation measures are anticipated, as some measures are detailed in Chapter 4, then a brief synopsis, including cost estimates and technology, should certainly be included in the Executive Summary because of the great importance of water quality to the surrounding communities.

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1-3 (from Scoping Process)

Socioeconomics

*Local communities will not have a sufficient tax base for hiring teachers and creating additional space to accommodate the influx of students.*

One comment in the report seemed to indicate that planning for schools was on-going within the county and therefore did not need to be addressed in the report.

*Examine the real commuter, road, and air quality impacts; include the precise number of contractors serving DoD entities to be relocated and the dollar figures of contracts under which these contractors perform.*

It appears that the DOD employees were surveyed, but contractor employees numbers were not addressed.

*Include precise numbers of bedrooms in the proposed housing to plan the precise number of children who will attend Fairfax County Public Schools.*

We did not see these numbers addressed.

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4-00

*Transportation. On-post facilities projects, taken together, would be expected to have negligible effects on Fort Belvoir area traffic. Impacts on the transportation network associated with off-post projects would be mitigated through roadway improvements by the developers. The largest contributor to future impacts would be the proposed National Museum of the U.S. Army. This could be sited at either the North Post golf course or along Route 1, east of Pence Gate. At either location, additional road improvements would be required. To quantify the effects of the museum on the transportation system, trip generation and mode split would need to be developed for site traffic.*

We believe that the impacts of the most likely museum sites should be incorporated into the BRAC EIS because the developments are not mutually inclusive with regards to environmental impacts, in terms of direct and cumulative impacts.

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4-220

*Fort Belvoir is incorporating storm water management and protection methods into land planning and new development as well as correcting and retrofitting existing problem areas. A storm water drainage system master plan study is currently underway, as discussed above. This study will identify current deficiencies (e.g. capacity problems, outfall problems, stream bank erosion) and determine infrastructure needs required to meet BRAC requirements and long-term growth through 2030. This study will also provide recommendations for storm water quality and quantity control, such as required design criteria, potential locations for new facilities, and methodologies that should be used or avoided. The MS4 storm water management program discussed in Section 4.7.1.3.1 requires "minimum control measures," including Best Management Practices (BMPs) to control storm water and pollutants in runoff. Fort Belvoir is developing pollution control measures that must be implemented within 5 years of permit issuance.*

This (above) is a good example of a replacement for the non-discussion in the ES. We would like to see some cost proposals associated with an aggressive storm water management plan for newly developed areas (EPG), and some assurance during this master planning/EIS process, that adequate storm water management funding would be a part of the BRAC funding, and not subject to the vagaries of future CIP requests.

In addition to prioritizing storm water management systems, we strongly support the inclusion of language in the adopted master plan (Preferred Alternative) that mandates the use of permeable surfaces at every opportunity for new constructed facilities or in re-constructed facilities, regardless of cost differences.

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ES-11

*Long-term moderate and minor adverse effects would be expected by implementing any of the four land use plans and by implementing BRAC. These effects would pertain to vegetation; wildlife; and endangered, threatened, and sensitive species.*

*• Main Post. The primary areas of biological resources concentration on the Main Post are the Southwest Area, land bordering the shores of the South Post, and the Special Natural Areas (SNA). All the alternatives would reduce vegetated areas on the post by a substantial amount and could indirectly affect vegetative communities and wildlife through habitat fragmentation and isolation and increased occurrences of invasive species, which would result in a loss of ecological integrity*

One of the flaws in an EIS process that is focused only on-site development impacts is that the integrity of wildlife genetic corridors is ignored at a larger cost to the connected ecological system. The very spirit and language of NEPA is directed towards consideration of extended and collateral affected environments. Thus, the potential impacts of BRAC development areas are a concern to those who support wildlife habitats on Mason Neck and in Northern Virginia.

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ES-12

*Assessment of specific adverse effects to historic properties from the proposed BRAC projects depends on the exact location of the proposed projects and the specific design details of the projects. These details include such things as building materials, construction footprint, height of buildings, and building design. Many of these project details cannot be determined until Fort Belvoir initiates the project design process. Until these details are developed, the exact nature and extent of adverse effects cannot be determined.*

It should be possible and necessary, however, to map the existence of historic sites and document areas of prehistoric archaeological sites within the mapped development areas, in support of the idea that once an archaeological resource is buried by structural development or terraforming, the impact becomes irreversible. Comprehensive analysis of cultural resources belongs at the proposed land use level and prior to the Final EIS.

Additionally, it is important to include the mapping of sites or structures of historic significance that are off-property, but adjacent to Fort Belvoir, for consideration of view-shed or transportation development impacts. The historic places on and around Fort Belvoir are important to the residents of Mason Neck and Northern Virginia because they contribute to the quality of life in irreplaceable ways.

The following are NRHP (National Register of Historic Places) sites within or adjacent to Fort Belvoir:

- Belvoir Mansion Ruins and Fairfax Grave-site.

- Pohick Episcopal Church.
- Gunston Hall Plantation and Mansion.
- Woodlawn Plantation.
- Pope-Leighey House
- Thermo-Con House, Fort Belvoir.
- Alexandria Friends Meeting House and Cemetery (NRHP eligible).
- Washington's Grist Mill
- Mount Vernon Mansion and Plantation

The following are sites within the Fairfax County Inventory of Historic Sites:

- Accotink United Methodist Church.
- Belvoir Mansion and Fairfax Grave.
- Camp Humphreys Pump Station and Filter Building.
- Fairfax Chapel.
- Fort Belvoir Historic District.
- Woodlawn Baptist Church (original).
- U.S. Army Package Power Reactor.

Some sites may have been overlooked in this list.

It should be noted that a portion of Fort Belvoir on South Post, extending through Mason Neck, contains remnants of the original route of the 600 mile Washington-Rochambeau baggage train on the march to Yorktown. The route is currently under study by National Park Service, with the Northern Virginia portion being researched by the historian as jointly funded by Northern Virginia counties. Following completion of a FEIS in the Summer of 2007, it is expected that the 600 mile length of the route will be declared a National Trail by Congress later this year.

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**Comments Keyed to SECTION 4.0: AFFECTED ENVIRONMENT AND CONSEQUENCES**

Table 4.2-6

*Comparison of Land Use Categories Between the 1993 Land Use Plan and the Proposed Land Use Plan.*

The proposal to bundle the category of Sensitive Land Uses with several other non-sensitive categories in effect dilutes the importance of those sensitive natural areas on Fort Belvoir by default. We insist that the category for Sensitive Land Uses not be removed or substituted By a "Community" category.

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Table 4.3-17 indicates a population increase of 2,767 by 2011 on Mason Neck. Given the absence of major private land blocks, and the few remaining infill opportunities, It would be difficult to forecast a population increase greater than 400 by 2011. Possibly, the population increase in Table 4.3-17 for Mason Neck was forecast based on mapping omissions in Figure 4.3-4. The map does not indicate the 800+ acres converted to public lands (Bureau of Land Management) in 2003, nor 115 acres purchased by Fairfax County Parks Authority in April, 2007. Demographic projections cited for Mason Neck and generated by Fairfax County prior to 2000 may also be inaccurate. The implications of no capacity to further absorb employment related population increases on Mason Neck would increase the travel time to and from the south of Fort Belvoir, to be factored into traffic forecasts and commensurate air quality impacts.

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Table 4.3-9, List of Improvements Beyond the Constrained Long-Range Plan, indicates improvements to Old Colchester Road from Route 1 to its terminus. Because of its historical

status, it is unlikely that Old Colchester Road will ever be altered significantly for traffic improvement. The road is a Virginia Byway, it is soon to be included in the 600 mile Washington Rochambeau National Historic Trail, and the road is also a current nominee for the National Register of Historic Places.

P. 4-84

***Transit Systems.** Mode split—the fraction of the employee population that would use mass transit—for the Main Post is 1 to 2 percent. The rail portion of the transit system does not directly serve the Main Post or EPG. Implementation of the BRAC-related projects, which would affect the vast majority of new personnel at Fort Belvoir, would likely not adversely affect use of the rail systems because of the continued lack of direct service.*

A predictable mode split of 2% at the EPG or Fort Belvoir sites is not a fundamental platform, for what was hoped to be a world class installation, by any notion of serious land use planning in the 21<sup>st</sup> century. Although it is our intent here to respond to the DEIS with special attention given to the preferred alternative, we see a more fundamental need for either a site selection directly linked to the Franconia transportation hub, or a DOD commitment to funding an appropriate rail expansion to Fort Belvoir. Bus service alone could not contribute significantly to the needed mode split, nor would a more fragmented user trip help to attract additional mass transit users.

The modal split issue provides an example of the reason our thinking is aligned with Representatives Davis and Moran in their insistence that the site selection process should not be closed, and that the alternative GSA warehouse site should be seriously considered.

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Statement on page 4-154:

***Motor Vehicles.** The realignment of Fort Belvoir would decrease both the number of vehicles and subsequently the total vehicle miles traveled within the region. In turn, regional motor vehicle emissions would decrease. This decrease would be primarily because of a net reduction of approximately 1,700 personnel leaving Fort Belvoir to locations outside the region. Although overall additional personnel at Fort Belvoir is expected to increase, the new personnel and the miles they currently commute are already with in the NCR. In addition, many of the new personnel are expected to either relocated to or be replaced by individuals living in areas outside, primarily south of, the region. These BRAC-related reductions in emissions would constitute an ongoing net benefit to the region's air quality. Therefore, although there is an SIP-based regional budget for motor vehicles, it was unnecessary to perform a direct comparison.*

This statement is either inaccurate or simply obtuse because the BRAC Commission's recommendations will generate a net increase of 22,000 people in the workforce on Fort Belvoir.

It would seem that a comparison of emissions based on the net increase of 22,000 personnel, with 68% commuting to and from the south, contributes to a measurable load in traffic, travel delay, and the resulting emissions.

Excerpts from the written statements by Virginia Secretary of Transportation, Mr. Pierce Homer, during the BRAC DEIS Scoping phase (Appendix B, Part 3), reflect the opinions of many of us in Northern Virginia and in Mason Neck:

*“.....Virginia will provide approximately \$89 million in construction funding for this (final segment of Fairfax County Parkway) Fairfax County Parkway project and approximately \$4 million worth of completed preliminary engineering work. Once the project and directly-related environmental remediation is complete, the Commonwealth will accept the Parkway into the state system of highways for long-term maintenance and operations. This arrangement will allow the Department of the Army, in consultation with the Commonwealth and the Federal Highway Administration, to design and construct the Fairfax County Parkway in a way that better integrates the limited available transportation capacity with the specific land uses and security needs of Fort Belvoir.*

*In addition, Virginia will fully fund and construct a fourth lane on I-95, from Rt. 123 to the Fairfax County Parkway, at an estimated cost of approximately \$75 million.*

*I need to underscore, however, that any serious analysis of the long-term Fort Belvoir transportation needs must consider more than just the final segment of the Fairfax County Parkway and the I-95 fourth lane.”*

It is our opinion that the impacts of BRAC proposed development on transportation capacity will extend from Fort Belvoir to I-66 on Fairfax County Parkway, from the Fairfax County Parkway to Route 234 on I-95, and from Fort Belvoir to Route 123 on Route 1. Additionally, because of collateral non-DOD support services and secondary commercial enterprises locating or re-locating to Fort Belvoir nearby locations (estimate 3,000-5,000 employees to the south, and 5,000-6,000 to the north), transportation capacity should be considered from Route 123 to I-495 on Route 1.

It appears to us that the DEIS and supporting studies have only considered the immediate Fort Belvoir-serving infrastructure elements of the larger affected environment, and this is an important concern for all of us in Mason Neck and Northern Virginia who may be obliged to fund transportation solutions in the future resulting from full BRAC implementation (2011-2016).

Regarding potential road improvements within Fort Belvoir, however, the BRAC generated facility master plan offers an opportunity to finally connect Main Post with North Post efficiently with a flyover(s) at Route 1, thus allowing unimpeded communication between the two properties, along with further streamlining traffic flow on Route 1.

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## Additional General Comments

1. The DEIS appears to be based on outdated and inaccurate information with regards to the Mason Neck area (e.g., a population increase of 3000 plus based on a full-scale residential development located at what is now Meadowood Farm, which is owned by the Federal Bureau of Land Management Agency).
2. The projects for transportation improvements are out-of-date and do not accurately depict an understanding for the needs, impact of BRAC, or current traffic situations of the communities (and commuters) who live along or travel along the roadways surrounding Ft. Belvoir.
3. The planned establishment of the Army Museum at Ft. Belvoir is expected to attract one million visitors each year. The DEIS does not adequately address the impact of this development on the transportation infrastructure related to BRAC.
4. The EIS estimates increased traffic of 10 – 30% on area roads with a corresponding increase in pollution and decrease in air quality. The National Capital region does not meet the current Ambient Air Quality Standards for ozone and fine particulates. While the EIS identifies some emissions, it ignores other significant emissions that can be expected and concludes that only minor impacts will occur.
5. The DEIS indicates, Figures 2-3 and 2-4, over 3,000 acres of land that has natural constraints, that are no longer labeled as environmentally sensitive and labels over a hundred acres of Accotink watershed land as “Professional/Institutional.” The streams and watersheds within Ft. Belvoir should be accurately labeled and consistent with the protections under the Chesapeake Bay Preservation Act and other Federal law protecting existing streams from the effects of development.
6. Land use classifications should retain the environmentally sensitive classification established to protect wetlands, provide wildlife habitat, and protection for endangered and threatened species. DOD should be required to comply with all existing federal, state, and local regulations related to the Chesapeake Bay Preservation Act and other relevant ordinances. Ft. Belvoir’s Integrated Natural Resources Management Plan (INRMP) should include a provision requiring coordination with the Virginia Department of Conservation and Recreation, Game and Inland Fisheries, and the U.S. Fish and Wildlife Service.
7. The Ft. Belvoir Master Plan is not being updated to provide a reasonably comprehensive picture of actions to be taken as a result of the DEIS that proposes to eliminate environmentally sensitive lands and destroy critical wildlife habitat on the Ft. Belvoir post.
8. The BRAC DEIS lacks the procedural processes that are required under the Administrative Procedures Act and other federal guidelines that require the establishment of a public docket for the review of materials in the Administrative Record.
9. Traffic congestion around present Ft. Belvoir and the entire Mt. Vernon District, severely impacted by the closure of Woodlawn Road to the public, has become “unbearable.” The National Capital region has the fourth highest congested traffic in the nation. The current transportation infrastructure cannot serve the BRAC proposals. Ten or more major road improvement projects are proposed to accommodate the increased workforce. Only one of these projects has an identified funding source. Since DOD “does not build roads”, there is an unfunded mandate of half-a-billion dollars imposed on state and local governments. It is highly unlikely that the required transportation infrastructure could be in place by the BRAC 2011 deadline.
10. Serious consideration should be given to relocating the National Geospatial Intelligence Agency (NGA) at the GSA warehouse complex near the Springfield Metro (Blue Line) station. Northern Virginia’s elected officials have requested Ft. Belvoir BRAC to utilize

the GSA warehouse facility. Use of the EPG however, should be limited to an agency relocation site only.