Davison Army Airfield Area Development Plan

Final Environmental Impact Statement

Vol. I & Vol. II

June 2021



US ARMY GARRISON FORT BELVOIR, VIRGINIA

Volume II – Appendices

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Appendix A – Public Involvement

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Draft EIS Distribution and Review

other compliance requirements for small entities other than the small organizations that will furnish the services to the Government.

2. The action will result in authorizing small entities to furnish the services to the Government.

3. There are no known regulatory alternatives which would accomplish the objectives of the Javits-Wagner-O'Day Act (41 U.S.C. 8501–8506) in connection with the services proposed for addition to the Procurement List.

End of Certification

Accordingly, the following services are added to the Procurement List:

Services

Service Type: Laundry Service
Mandatory for: U.S. Navy, Navy Medicine Readiness and Training Unit, Naval Support Activity Mid-South, Millington, TN
Mandatory Source of Supply: Wiregrass Rehabilitation Center, Inc., Dothan, AL
Contracting Activity: Dept of the Navy, Naval Hospital Pensacola FL
Service Type: Janitorial Service
Mandatory for: U.S. Army Engineer District San Francisco, Bay Model Visitor Center and Baseyard Building, Sausalito, CA
Mandatory Source of Supply: North Bay Rehabilitation Services, Inc., Rohnert Park, CA
Contracting Activity: Dept of the Army, W075 Endist San Fran
Service Type: Custodial Service
Mandatory for: FAA, Cheyenne System Support Center, Cheyenne, WY
Mandatory Source of Supply: Northwest Community Action Programs of Wyoming, Inc., Worland, WY
Contracting Activity: Federal Aviation Administration, 697DCK Regional Acquisitions SVCS
Service Type: Janitorial & Grounds Service
Mandatory for: FAA, Air Traffic Control Tower, Teterboro, NJ
Mandatory Source of Supply: Fedcap Rehabilitation Services, Inc., New York, NY
Contracting Activity: Federal Aviation Administration, 697DCK Regional Acquisitions SVCS
Service Type: Grounds Maintenance
Mandatory for: FAA, Charlotte Air Traffic Control Tower, Charlotte, NC
Mandatory Source of Supply: The Charles Lea Center, Inc., Spartanburg, SC
Contracting Activity: Federal Aviation Administration, 697DCK Regional Acquisitions SVCS

Deletions

On 6/19/2020, the Committee for Purchase From People Who Are Blind or Severely Disabled published notice of proposed deletion from the Procurement List. This notice is published pursuant to 41 U.S.C. 8503 (a)(2) and 41 CFR 51–2.3.

After consideration of the relevant matter presented, the Committee has determined that the product listed below is no longer suitable for procurement by the Federal Government under 41 U.S.C. 8501–8506 and 41 CFR 51–2.4.

Regulatory Flexibility Act Certification

I certify that the following action will not have a significant impact on a substantial number of small entities. The major factors considered for this certification were:

1. The action will not result in additional reporting, recordkeeping or other compliance requirements for small entities.

2. The action may result in authorizing small entities to furnish the product to the Government.

3. There are no known regulatory alternatives which would accomplish the objectives of the Javits-Wagner-O'Day Act (41 U.S.C. 8501–8506) in connection with the product deleted from the Procurement List.

End of Certification

Accordingly, the following product is deleted from the Procurement List:

Product

NSN(s)—Product Name(s):
7930–01–555–2897—Degreaser, Biorenewable, Industrial Strength, 5 gl
Mandatory Source of Supply: VisionCorps, Lancaster, PA
Contracting Activity: GSA/FSS Greater Southwest Acquisiti, Fort Worth, TX

Michael R. Jurkowski,

Deputy Director, Business & PL Operations.

[FR Doc. 2020–16089 Filed 7–23–20; 8:45 am]

BILLING CODE 6353–01–P

CONSUMER PRODUCT SAFETY COMMISSION

Sunshine Act Meeting Notice

TIME AND DATE: Wednesday, July 29, 2020; 1:30 p.m.

PLACE: via Teleconference.

STATUS: Commission Meeting—Closed to the Public.

MATTER TO BE CONSIDERED: Staff will brief the Commission on the status of a compliance program.

CONTACT PERSON FOR MORE INFORMATION: Alberta E. Mills, Secretary, Division of the Secretariat, Office of the General Counsel, U.S. Consumer Product Safety Commission, 4330 East West Highway, Bethesda, MD 20814, (301) 504–7479.

Dated: July 22, 2020.

Alberta E. Mills,

Secretary.

[FR Doc. 2020–16234 Filed 7–22–20; 4:15 pm]

BILLING CODE 6355–01–P

DEPARTMENT OF DEFENSE

Department of Army

Draft Environmental Impact Statement and Draft Finding of No Practicable Alternative for Implementation of Area Development Plan at Davison Army Airfield, Fort Belvoir, Virginia

AGENCY: Department of Army, DoD.

ACTION: Notice of Availability.

SUMMARY: The Department of Army (Army) announces the availability of the Draft Environmental Impact Statement (EIS) for the proposed implementation of an Area Development Plan (ADP) for Davison Army Airfield (DAAF) at Fort Belvoir, Virginia. In accordance with the National Environmental Policy Act (NEPA), the Draft EIS analyzes the potential environmental impacts associated with implementing the construction, modernization, and demolition projects at DAAF recommended in the ADP (Proposed Action). A Draft Finding of No Practicable Alternative (FONPA) addressing potential impacts on floodplains and wetlands is also available for comment with the Draft EIS.

DATES: Comments must be received by September 8, 2020.

ADDRESSES: Please send written comments to: Fort Belvoir Directorate of Public Works, Environmental Division (DPW–ED), RE: DAAF ADP EIS 9430, Jackson Loop, Suite 200, Fort Belvoir, Virginia 22060–5116. Comments may also be provided via email to: *usarmy.belvoir.imcom-atlantic.mbx.enrd@mail.mil*

FOR FURTHER INFORMATION CONTACT: Nicola Cowen via phone at (703) 806–0054 or (703) 473–9231, during normal working business hours, Monday through Friday, 8:00 a.m. to 4:00 p.m. Further information may also be requested via email to: *usarmy.belvoir.imcom-atlantic.mbx.enrd@mail.mil.*

SUPPLEMENTARY INFORMATION: The Proposed Action would be implemented over an approximately 30-year time period to provide facilities and infrastructure necessary to support the ongoing and future missions of the airfield's tenants. The Proposed Action would improve the airfield's functional layout, demolish and replace aging facilities and infrastructure, and address multiple operational safety concerns along the runway. The ADP is specific to DAAF and all projects would occur entirely within its boundaries. No substantial changes in missions, air

operations, or the number of aircraft and personnel at DAAF would occur under the Proposed Action.

The Draft EIS analyzes the potential environmental impacts of the Proposed Action, to implement the construction, modernization, and demolition projects recommended in the ADP. The Proposed Action would occur entirely within the 673-acre DAAF property on Fort Belvoir. Up to 24 ADP projects would be implemented in three sequential phases over the course of an approximately 30-year time period, as follows: Short-range (next 10 years), mid-range (11 to 20 years from now), and long-range (21 to 30 years from now). No substantial changes in missions, air operations, or the number of aircraft and personnel at DAAF would occur under the Proposed Action. Operational noise levels following implementation of the Proposed Action would remain similar to current conditions.

The Proposed Action includes the construction of new hangars, and administrative and operational facilities; the modernization of existing facilities; the demolition of up to 37 existing buildings and structures; and related infrastructure improvements. Demolition activities would remove a number of facilities that partially obstruct the airfield's Primary and Transitional Surfaces, which are required to be free of obstructions in accordance with Department of Defense (DoD) operational safety criteria. These facilities require temporary safety waivers to operate.

The Draft EIS assesses the direct, indirect, and cumulative potential environmental impacts associated with the Proposed Action. The Army evaluated several alternatives for the Proposed Action before selecting two alternatives for detailed analysis in the Draft EIS: The Full Implementation Alternative and the Partial Implementation Alternative. A No Action Alternative was also carried forward for analysis in the Draft EIS.

The Full Implementation Alternative would implement the complete suite of 24 projects recommended in the DAAF ADP. Up to 37 existing buildings and structures on DAAF would be demolished to remove facilities determined to be unnecessary, inadequate, or redundant. This would include the demolition of all facilities partially obstructing the airfield's Primary and Transitional Surfaces as described above. The Full Implementation Alternative would accommodate the space and functional needs of all DAAF tenants consistent with applicable DoD requirements. It would also fulfill DAAF's vision to create a safe, secure, sustainable, and consolidated aviation complex.

The Partial Implementation Alternative would implement a modified, reduced program of 15 ADP projects at DAAF. This Alternative would amount to implementing all of the short-range and most of the mid-range projects; none of the long-range projects would be implemented. A total of 24 existing buildings and structures at DAAF would be demolished, including all but two facilities within the airfield's Primary and Transitional Surfaces. These facilities would continue to operate under temporary safety waivers for the foreseeable future. The Partial Implementation Alternative would not address DAAF's tenants' requirements in full, but would substantially improve conditions.

Under the No Action Alternative, the Army would not implement the DAAF ADP; existing conditions at the airfield would continue for the foreseeable future. None of the proposed construction, modernization, demolition, and infrastructure improvement projects would occur. Facilities within the airfield's Primary and Transitional Surfaces would continue to require temporary safety waivers to operate. The No Action Alternative did not meet the screening criteria developed by the Army, but was carried forward for analysis in the Draft EIS to provide a baseline against which impacts of the Full and Partial Implementation Alternatives could be measured.

Natural resources on DAAF include those associated with Accotink Creek, a tributary of the Potomac River that traverses the northern side of the airfield property. Both the Full Implementation Alternative and Partial Implementation Alternative would impact some environmental resources at DAAF, including the 100-year floodplain, waters of the U.S. (including wetlands), and Chesapeake Bay Resource Protection Areas. Accordingly, the Army has also prepared a Draft Finding of No Practicable Alternative (FONPA) to comply with Executive Order (E.O.) 11988, *Floodplain Management* and E.O. 11990, *Protection of Wetlands.* As described in the Draft EIS, management measures would be implemented to avoid or minimize less than significant adverse impacts on these resources. The Draft EIS identifies ''significant'' adverse effects on waters of the U.S., including wetlands from the Full and Partial Implementation Alternatives. Adherence to applicable permitting requirements would mitigate these impacts to the extent possible.

All government agencies, special interest groups, and individuals are invited to participate in the Army's decision-making process for the subject Proposed Action. A 45-day public review period for the Draft EIS and Draft FONPA will begin on July 24, 2020. Interested parties will also be invited to attend two public telephone meetings scheduled for August 24, 2020. Due to the COVID–19 Pandemic and the need to maintain social distancing, all public meeting materials will be provided online, and the public meeting will be hosted by telephone. The meeting materials can be found at *https://home.army.mil/belvoir/index.php/about/Garrison/directorate-public-works/environmental-division.* There will be two public telephone calls scheduled for August 24, 2020. The phone number for both meetings is 1–877–286–5733. The 1st meeting will be from 1:00 p.m. to 3:00 p.m., and the passcode is 676543300#. The 2nd meeting will be from 6:00 p.m. to 8:00 p.m., and the passcode is 66866226#. If you cannot access the meeting materials online, please submit a request for the meeting materials to: *usarmy.belvoir.imcom-atlantic.mbx.enrd@mail.mil.* To submit a request by mail, please submit it to see **ADDRESSES**. Mail must be postmarked not later than August 10, 2020 so the meeting materials can be sent by United States Postal Service. Notification of the public telephone meeting will be announced in the local news media and on the Fort Belvoir website listed below.

An electronic copy of the Draft EIS and Draft FONPA will be made available for view or download online at: *https://home.army.mil/belvoir/index.php/about/Garrison/directorate-public-works/environmental-division.*

Brenda S. Bowen,

Army Federal Register Liaison Officer.

[FR Doc. 2020–16005 Filed 7–23–20; 8:45 am]

BILLING CODE 5061–AP–P

DEPARTMENT OF EDUCATION

[Docket No.: ED–2020–SCC–0119]

Agency Information Collection Activities; Comment Request; Teacher Education Assistance for College and Higher Education Grant Eligibility Regulations

AGENCY: Federal Student Aid (FSA), Department of Education (ED).

ACTION: Notice.

SUMMARY: In accordance with the Paperwork Reduction Act of 1995, ED is

Ad # 12314913 Name AECOM Size 136 Lines T0003
Class 820 PO# Authorized by Account 2010263154

PROOF OF PUBLICATION

District of Columbia, ss., Personally appeared before me, a Notary Public in and for the said District, Chatisha Cadlett well known to me to be ACCOUNTING SPECIALIST of The Washington Post, a daily newspaper published in the City of Washington, District of Columbia, and making oath in due form of law that an advertisement containing the language annexed hereto was published in said newspaper on the dates mentioned in the certificate herein.

I Hereby Certify that the attached advertisement was published in The Washington Post, a daily newspaper, upon the following date(s) at a cost of $1,645.68 and was circulated in the Washington metropolitan area.

Published 1 time(s). Date(s):24 of July 2020

Account 2010263154 Chatisha Cadlett

Witness my hand and official seal this 27th day of July 20 20

Judith B Peters

My commission expires 11-30-20

JUDITH B. PETERS NOTARY PUBLIC DISTRICT OF COLUMBIA MY COMMISSION EXPIRES 11-30-2020

NOTICE OF AVAILABILITY DRAFT ENVIRONMENTAL IMPACT STATEMENT AND DRAFT FINDING OF NO PRACTICABLE ALTERNATIVE FOR THE DAVISON ARMY AIRFIELD AREA DEVELOPMENT PLAN U.S. Army Garrison Fort Belvoir, Fairfax County, Virginia Description. Interested parties are hereby notified that the Department of Army (Army) has prepared a Draft Environmental Impact Statement (EIS) regarding the proposed action described below. Notice is also made for a Draft Finding of No Practical Alternative (FONPA), prepared by the Army to comply with Executive Order (EO) 11988, Floodplain Management and EO 11990, Protection of Wetlands. Statutory Authority. This notice is being issued to all interested parties in accordance with the National Environmental Policy Act (NEPA), Council on Environmental Quality NEPA implementing regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508), and Army NEPA regulations (32 CFR Part 651). Proposed Action. The Army proposes to implement an Area Development Plan (ADP) for Davison Army Airfield (DAAF) on Fort Belvoir in Fairfax County, Virginia. The proposed ADP would provide DAAF and its tenant organizations with the required facilities and infrastructure to fully support their ongoing missions. Implementing the ADP for DAAF would also address multiple operational safety concerns along the runway and improve the functional layout of the airfield as a whole. Projects in the proposed ADP would be implemented over the next 30 years. Public Review. The Draft EIS and Draft FONPA are available for view or download online or by request, as follows: Online https://home.army.mil/belvoir/index.php/about/Garrison/ directorate-public-works/environmental-division Compact Disc Request by email to: FortBelvoirNOI@usace.army.mil Request by mail to: US Army Fort Belvoir Directorate of Public Works Attn.: DAAF Draft EIS Environmental Division, Chief 9430 Jackson Loop, Building 1442, Rm #230 Fort Belvoir, Virginia 22060-5116 Printed copies of the Draft EIS and Draft FONPA typically provided to local libraries will not be available due to COVID-19 restrictions. All materials will be provided online. If you

cannot access the Draft EIS materials online, please send a request for information to the above address. Comments. The Army welcomes your participation in its decision-making process and solicits your feedback on the proposed action. In accordance with 32 CFR Part 651.14, the Draft EIS will be available for a 45-day public review period starting 24 July 2020. During this period, the public may submit comments on the Draft EIS and Draft FONPA. Written comments or requests for additional information about the proposed action and environmental review can be made via email or postal mail, as noted above. The 45-day public review and comment period for the Draft EIS and Draft FONPA will conclude on 8 September 2020.

From Page 13

violence and sexual assault in our community by becoming a volunteer. Volunteers benefit from the unique experience of interacting personally with victims of domestic violence and sexual assault. There are opportunities in DVP for special events volunteers, court advocates and shelter supervisors. Call 703-746-4911 or visit alexandriava.gov/DomesticViolence. To become a SAC volunteer, which includes opportunities for Volunteer Hotline Advocates, call Lydia at 703-746-3127 or visit alexandriava.gov/SexualViolence.

Assistance League of Northern Virginia, a volunteer nonprofit, invites community members to join the organization to participate in its Reading Express program. Volunteers provide one-on-one tutoring to first grade students during the school year. To learn more contact VP Membership Mary Gronlund at gronbiz@aol.com or Program Coordinator Lynn Barron at lynnieb517@verizon.net.

United Community (formerly UCM), with main office located at 7511 Fordson Road, Alexandria, seeks volunteers for Food Pantry assistance, Early Learning Center teacher aides, basic needs counselors, youth tutors and mentors, office administration/data entry.

See Bulletin, Page 14

Evictions

From Page 12

Center in Richmond asked for the same.

The South County Task Force letter noted that "In an analysis of eviction moratoria in 50 states, Princeton's Eviction Lab's interactive Policy Scorecard rated Virginia's Supreme Court ordered moratorium only a half-star out of five stars, because it lacked most of the provisions that would alleviate a rent crisis when the moratorium lifts" and that "Governors in 30 states have issued executive orders to halt evictions."

Northam has insisted that he doesn't have the authority to order an eviction moratorium, but a July 15 letter from Attorney General Mark Herring in response to a query from several legislators says, "The Governor has both the executive and statutory authority to issue emergency orders.... Whether any particular executive order is an appropriate exercise of emergency power depends on the scope of the executive order and the facts and circumstances."

Herring also said the "General Assembly can pass legislation placing limitations on evictions" as well as "pass legislation allowing localities to place limitations on evictions."

The General Assembly starts a special session Aug. 18 that is restricted to dealing with the budget and police reform, but an eviction moratorium might be appropriate if the Governor does not act by then.

Classified

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Legals

NOTICE OF AVAILABILITY

DRAFT ENVIRONMENTAL IMPACT STATEMENT AND DRAFT FINDING OF NO PRACTICABLE ALTERNATIVE FOR THE DAVISON ARMY AIRFIELD AREA DEVELOPMENT PLAN

U.S. Army Garrison Fort Belvoir, Fairfax County, Virginia

Description. Interested parties are hereby notified that the Department of Army (Army) has prepared a Draft Environmental Impact Statement (EIS) regarding the proposed action described below. Notice is also made for a Draft Finding of No Practical Alternative (FONPA), prepared by the Army to comply with Executive Order (EO) 11988, Floodplain Management and EO 11990, Protection of Wetlands.

Statutory Authority. This notice is being issued to all interested parties in accordance with the National Environmental Policy Act (NEPA), Council on Environmental Quality NEPA Implementing regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508), and Army NEPA regulations (32 CFR Part 651).

Proposed Action. The Army proposes to implement an Area Development Plan (ADP) for Davison Army Airfield (DAAF) on Fort Belvoir in Fairfax County, Virginia. The proposed ADP would provide DAAF and its tenant organizations with the required facilities and infrastructure to fully support their ongoing missions. Implementing the ADP for DAAF would also address multiple operational safety concerns along the runway and improve the functional layout of the airfield as a whole. Projects in the proposed ADP would be implemented over the next 30 years.

Public Review. The Draft EIS and Draft FONPA are available for view or download online or by request, as follows:

Online https://home.army.mil/belvoir/index.php/about/Garrison/directorate-public-works/environmental-division

Compact Disc **Request by email to:** FortBelvoirNDI@usace.army.mil

Request by mail to:
US Army Fort Belvoir Directorate of Public Works
Attn.: DAAF Draft EIS
Environmental Division, Chief
9430 Jackson Loop, Building 1442, Rm #230
Fort Belvoir, Virginia 22060-5116

Printed copies of the Draft EIS and Draft FONPA typically provided to local libraries will not be available due to COVID-19 restrictions. All materials will be provided online. If you cannot access the Draft EIS materials online, please send a request for information to the above address.

Comments. The Army welcomes your participation in its decision-making process and solicits your feedback on the proposed action. In accordance with 32 CFR Part 651.14, the Draft EIS will be available for a 45-day public review period starting 24 July 2020. During this period, the public may submit comments on the Draft EIS and Draft FONPA. Written comments or requests for additional information about the proposed action and environmental review can be made via email or postal mail, as noted above. The 45-day public review and comment period for the Draft EIS and Draft FONPA will conclude on 8 September 2020.

Announcements



An expert is someone who knows some of the worst mistakes that can be made in his subject and how to avoid them. **-Werner Heisenberg**

Announcements

Orange County Public Schools
Orange County, Virginia

SEEKING TO FILL THE FOLLOWING POSITIONS:
Instructional Specialist
Teacher - Gifted & Talented • Teacher - Middle School Math
Teacher - Grade 1 • Teacher - Special Education

The Orange County School Board does not discriminate on the basis of sex, sexual orientation, gender, gender identity, race, color, national origin, disability, religion, ancestry, age, marital status, pregnancy, childbirth or related medical conditions, disability, status as a veteran, genetic information or any other characteristics protected by law in its employment practices or educational program and activities. Compliance inquiries should be directed to the Director of Human Resources, 200 Dailey Drive, Orange, VA 22960 or by phone at 540-661-4530.

Candidates must apply at **www.ocss-va.org**

Announcements



Announcements



Announcements



Distribution of the Draft EIS

The 45-day Draft EIS public review period began on July 24 and ended on September 8, 2020. **Table A-1** lists the individuals who were notified of the availability of the Draft EIS and associated documents for public review and comment.

Table A-1: Draft EIS Distribution List

Name	Title / Affiliation	Agency / Organization
Federal Agencies		
Rob Tomiak	Director	U.S. Environmental Protection Agency Office of Federal Activities
Barbara Rudnick	NEPA Team Leader	U.S. Environmental Protection Agency, Region 3 Office of Environmental Programs (3EA30)
Nora Theodore	NEPA Reviewer	U.S. Environmental Protection Agency, Region 3 Office of Environmental Programs (3EA30) Environmental Assessment and Innovation Division
John A. Bricker	State Conservationist	U.S. Department of Agriculture Natural Resources Conservation Service
Sharon Glasgow	Senior Airport Planning Specialist	Federal Aviation Administration Airport Planning and Environmental Division (APP-400)
Jean Wolfers-Lawrence	Environmental Specialist	Federal Aviation Administration Airport Planning and Environmental Division (APP-400)
Jeffrey Breeden	Community Planner	Federal Aviation Administration Washington Airports District Office
Stephanie Everfield	Regional Environmental Officer	Federal Emergency Management Agency Environmental Planning & Historic Preservation
Cindy Schulz	Field Supervisor	U.S. Fish and Wildlife Service Virginia Field Office
Genevieve LaRouche	Project Leader	U.S. Fish and Wildlife Service Chesapeake Bay Field Office
Marcel C. Acosta	Executive Director	National Capital Planning Commission
Diane Sullivan	Director, Urban Design and Plan Review Division	National Capital Planning Commission
Michael Weil		National Capital Planning Commission
Lee Webb	Historic Preservation Specialist, Urban Design and Plan Review Division	National Capital Planning Commission

Table A-1: Draft EIS Distribution List

Name	Title / Affiliation	Agency / Organization
Reid Nelson	Director	Advisory Council on Historic Preservation Office of Federal Agency Programs
Katry Harris	Program Analyst	Advisory Council on Historic Preservation Office of Federal Agency Programs
Christopher Daniel	Program Analyst	Advisory Council on Historic Preservation Office of Federal Agency Programs
Kimberly Damon-Randall	Deputy Regional Administrator for Protected Resources, NOAA Fisheries Greater Atlantic Region	Greater Atlantic Region Fisheries Office, National Marine Fisheries Service Protected Resources
Michaela Noble	Acting Director	U.S. Department of the Interior, Office of Environmental Policy and Compliance
Troy M Andersen	Supervisory Fish and Wildlife Biologist	USFWS, Region 5, Virginia Field Office, Conservation Planing Assistance Supervisor
Emily Biondi	Director	U.S. DOT, Federal Highway Administration, Office of Project Development & Environmental Review
Sean Corson	Acting Director	NOAA, National Marine Fisheries Service, Chesapeke Bay Office
State Agencies		
Helen Cuervo, P.E.	District Engineer	Virginia Department of Transportation Northern Virginia District
Rahul Trivedi	Planning Manager	Virginia Department of Transportation
Kate Mattice	Executive Director	Northern Virginia Transportation Commission
René Hypes	Environmental Review Coordinator	Virginia Department of Conservation and Recreation Natural Heritage Program
Tyler Meader	Project Review Assistant	Virginia Department of Conservation and Recreation Natural Heritage Program
Ray Fernald	Manager	Virginia Department of Game and Inland Fisheries Environmental Services Section
Bettina Rayfield	Manager	Virginia Department of Environmental Quality Office of Environmental Impact Review
Laura McKay	Program Manager	Virginia Department of Environmental Quality Virginia Coastal Zone Management Program
Marc E. Holma	Architectural Historian	Virginia Department of Historic Resources Office of Review and Compliance

Table A-1: Draft EIS Distribution List

Name	Title / Affiliation	Agency / Organization
Valerie Fulcher	Executive Secretary Senior	Office of Environmental Impact Review, Virginia Department of Environmental Quality
Arlene Fields Warren	GIS Program Support Technician	Virginia Department of Health Office of Drinking Water
Local Agencies		
Bryan Hill	County Executive	Fairfax County
Tom Biesiadny	Director	Fairfax County Department of Transportation
Robert Pikora	Senior Transportation Planner	Fairxfax County Department of Transportation
Peter F. Murphy, Jr.	Chairman	Fairfax County Planning Commission
Barbara Byron	Director	Fairfax County Department of Planning and Development
Leanna O'Donnell	Director	Fairfax County Department of Planning and Development Planning Division
Erin Haley	Department of Planning and Development	Fairfax County Wetlands Board
James Patterson	Chief	Fairfax County Department of Public Works and Environmental Services Stormwater Planning Division Watershed Planning and Assessment Branch
Richard R. Bowers, Jr.	Chief	Fairfax County Fire and Rescue Department
Edwin C. Roessler, Jr.	Chief of Police	Fairfax County Police Department
David Bowden	Director	Fairfax County Park Authority Planning and Development Division
Victor Hoskins	President and CEO	Fairfax County Economic Development Authority
David Buchta, MHP	Heritage Conservation Branch Manager	Fairfax County Park Authority, Heritage Conservation
Laura Arseaneau	Historic Preservation Planner	Fairfax County Department of Planning and Development
Karen Sheffield	Manager	Huntley Meadows Park Fairax County Parks Authority
Kevin Munroe		Huntley Meadows Park Fairax County Parks Authority
Daniel G. Storck	Supervisor	Mount Vernon District, Fairfax County

Table A-1: Draft EIS Distribution List

Name	Title / Affiliation	Agency / Organization
Willie Woode	Senior Conservation Specialist	Northern VA Soil and Water Conservation District (Fairfax County
Regional Agencies		
Chuck Bean	Executive Director	Metropolitan Washington Council of Governments
Stephen Walz	Director	Metropolitan Washington Council of Governments Department of Environmental Programs
Robert W. Lazaro	Executive Director	Northern Virginia Regional Commission
Julie Coons	President & CEO	Northern Virginia Chamber of Commerce
Kanathur Srikanth	Director	Metropolitan Washington Council of Governments Department of Transportation Planning
Todd Hafner	Senior Project Manager	Nothern Viginina Regional Park Authority
Marcel Acosta	Exective Director	National Capital Planning Commission
Sean Corson	Acting Director	NOAA, National Marine Fisheries Service, Chesapeke Bay Office
Tribes		
Leo Henry	Chief	Tuscarora Nation of New York
Rene Rickard	Director	Tuscarora Environment
Joe Bunch	Chief	United Keetoowah Band of Cherokee Indians in Oklahoma
Whitney Warrior	Tribal Historic Preservation Officer	United Keetoowah Band of Cherokee Indians in Oklahoma
William Harris	Chief	Catawba Indian Nation Tribal Historic Preservation Office
Caitlin Totherow	Tribal Historic Preservation Officer	Catawba Indian Nation Tribal Historic Preservation Office
Russell Townsend	Tribal Historic Preservation Officer	Eastern Band of Cherokee Indians
Robert Gray	Chief	Pamunkey Indian Tribe
Stephen R. Adkins	Chief	Chickahominy Indian Tribe
Gerald Stewart	Chief	Chickahominy Indians Eastern Division
Frank Adams	Chief	Upper Mattaponi Tribe

Table A-1: Draft EIS Distribution List

Name	Title / Affiliation	Agency / Organization
Dean Branham	Chief	Monacan Indian Nation
Samuel Bass	Chief	Nansemond Indian Tribe
Non-Governmental and Cultural Resources Organizations		
Mary Rafferty	Executive Director	Virginia Conservation Network
Dean Naujoks	Potomac Riverkeeper	Potomac Riverkeepers
Alan Rowsome	Executive Director	The Northern Virginia Conservation Trust
Rentz Hilyer	Land Conservation Specialist	The Northern Virginia Conservation Trust
Mark Viani	President	Southeast Fairfax Development Corporation
Tim Thompson	President	Fairfax County Federation of Citizens Associations
Ken Gaffey	President	Inlet Cove Board of Directors
Judy Riggin	Director	Alexandria Friends Meeting at Woodlawn
Karen Pohorylo	Chairman, Environment & Recreation	Mount Vernon Council of Citizens' Associations
Katherine Ward	Co-Chiar, Liaison to Environment & Recreation and Pulbic Safety	Mount Vernon Council of Citizens' Associations
Cathy Ledec	President	Friends of Huntley Meadows
Tom Blackburn	President	Audubon Society of Northern Virginia
Hedrick Belin	President	Potomac Conservancy
Peggy Sanner	Virginia Executive Director	Chesapeake Bay Foundation
Dale Rumberger	President	South County Federation
Philip Latasa	Chronicler	Friends of Accotink Creek
Theresa Cullen	Executive Director	Alice Ferguson Foundation
Laurie Ossman	Executive Director	Woodlawn Plantation and Frank Lloyd Wright's Pope Leighey House
Scott Stroh	Director	Gunston Hall Plantation
Chris Barbuschak	President	Historical Society of Fairfax County, Virginia
Brian Collison	Pastor	Pillar Church of Woodlawn

Table A-1: Draft EIS Distribution List

Name	Title / Affiliation	Agency / Organization
Dr. Lynn P. Ronaldi	Reverend	Pohick Episcopal Church
Ross M. Bradford	Senior Associate General Counsel	Law Department National Trust for Historic Preservation
Elected Officials		
Mark Warner	Senator of Virginia	United States Senate
Timothy Mi. Kaine	Senator of Virginia	United State Senate
Ralph Northam	Governor	Commonwealth of Virginia
Mark Sickles	Delegate	Virginia House of Delegates
Scott A. Surovell	Senator	Virginia State Senate

Carver, Craig

From: Carver, Craig
Sent: Friday, July 24, 2020 8:04 AM
To: Carver, Craig
Subject: Draft EIS - Davison Army Airfield, Fort Belvoir, VA - Notice of Availability and 45-day public comment period
Attachments: DAAF ADP DEIS_NOA Legal Notice_FINAL_July 2020.pdf

Dear Stakeholder,

On behalf of the US Army Corps of Engineers (USACE), Baltimore District, this message is to inform you that the Draft Environmental Impact Statement (EIS) for an Area Development Plan (ADP) at Davison Army Airfield (DAAF), US Army Garrison Fort Belvoir, Virginia is available for a 45-day day public review and comment period that begins on July 24, 2020 and ends on September 8, 2020. Notice is also being given for a Draft Finding of No Practical Alternative (FONPA) that the Army has prepared in compliance with Executive Order (EO) 11988, *Floodplain Management* and EO 11990, *Protection of Wetlands*. A copy of the official public notice announcing the availability of the Draft EIS and Draft FONPA is attached to this email.

USACE has prepared the Draft EIS in accordance with the National Environmental Policy Act of 1969 (NEPA) to evaluate the potential environmental impacts from the Army's Proposed Action to implement multiple construction, modernization, demolition, and infrastructure improvement projects identified in the DAAF ADP. The proposed ADP projects would be implemented over 30 years and would provide DAAF and its tenant organizations with the required facilities and infrastructure to fully support their ongoing missions. Copies of the Draft EIS, Draft FONPA, and related documents can be viewed and downloaded from Fort Belvoir's website at:

https://home.army.mil/belvoir/index.php/about/Garrison/directorate-public-works/environmental-division

The Army will host two public teleconferences on **August 24, 2020** to provide the general public and government regulatory agencies with the opportunity to learn about and comment on the Proposed Action and the Draft EIS. The first teleconference will be held from 1:00 PM–3:00 PM and the second will be held from 6:00 PM–8:00 PM. The teleconferences may be accessed toll-free by dialing 1-877-286-573 and entering one of the following passcodes when prompted:

Teleconference 1: 1:00 – 3:00 PM; Passcode: 676-543-300#
Teleconference 2: 6:00 PM – 8:00 PM; Passcode: 668-662-26#

The format and content of each teleconference will be the same. Callers will have the opportunity to ask questions and comment on the Proposed Action and Draft EIS during each teleconference. All comments and questions received during the teleconferences will be addressed in the Final EIS, as appropriate.

Comments on the Draft EIS may be submitted any time during the 45-day public comment period. A comment form is available for download at the website provided above. Completed comment forms can be submitted as an email attachment to FortBelvoirNOA@usace.army.mil or mailed via US Postal Service to:

US Army Fort Belvoir Directorate of Public Works
Attn.: DAAF Draft EIS
Environmental Division, Chief
9430 Jackson Loop, Building 1442, Rm #230
Fort Belvoir, Virginia 22060-5116

Comments on the Draft EIS and Proposed Action should be submitted by **September 8, 2020**.

Requests for a printed or electronic copy of the Draft EIS should be sent to the email or postal address provided above.

Your comments and questions on the Draft EIS and the Army's Proposed Action are strongly encouraged. All comments and questions will be addressed in the Final EIS as appropriate. This notification may be forwarded to others who may have an interest in the Proposed Action and the Draft EIS.

Thank you for your participation in the NEPA process.

*****PLEASE DO NOT REPLY TO THIS EMAIL*****

NOTICE OF AVAILABILITY

DRAFT ENVIRONMENTAL IMPACT STATEMENT AND DRAFT FINDING OF NO PRACTICABLE ALTERNATIVE FOR THE DAVISON ARMY AIRFIELD AREA DEVELOPMENT PLAN

U.S. Army Garrison Fort Belvoir, Fairfax County, Virginia

Description. Interested parties are hereby notified that the Department of Army (Army) has prepared a Draft Environmental Impact Statement (EIS) regarding the proposed action described below. Notice is also made for a Draft Finding of No Practical Alternative (FONPA), prepared by the Army to comply with Executive Order (EO) 11988, *Floodplain Management* and EO 11990, *Protection of Wetlands*.

Statutory Authority. This notice is being issued to all interested parties in accordance with the National Environmental Policy Act (NEPA), Council on Environmental Quality NEPA implementing regulations (*40 Code of Federal Regulations [CFR] Parts 1500-1508*), and Army NEPA regulations (*32 CFR Part 651*).

Proposed Action. The Army proposes to implement an Area Development Plan (ADP) for Davison Army Airfield (DAAF) on Fort Belvoir in Fairfax County, Virginia. The proposed ADP would provide DAAF and its tenant organizations with the required facilities and infrastructure to fully support their ongoing missions. Implementing the ADP for DAAF would also address multiple operational safety concerns along the runway and improve the functional layout of the airfield as a whole. Projects in the proposed ADP would be implemented over the next 30 years.

Public Review. The Draft EIS and Draft FONPA are available for view or download online or by request, as follows:

Online https://home.army.mil/belvoir/index.php/about/Garrison/directorate-public-works/environmental-division

Compact Disc **Request by email to:**
FortBelvoirNOI@usace.army.mil

Request by mail to:
US Army Fort Belvoir Directorate of Public Works
Attn.: DAAF Draft EIS
Environmental Division, Chief
9430 Jackson Loop, Building 1442, Rm #230
Fort Belvoir, Virginia 22060-5116

Printed copies of the Draft EIS and Draft FONPA typically provided to local libraries will not be available due to COVID-19 restrictions. All materials will be provided online. If you cannot access the Draft EIS materials online, please send a request for information to the above address.

Comments. The Army welcomes your participation in its decision-making process and solicits your feedback on the proposed action. In accordance with *32 CFR Part 651.14*, the Draft EIS will be available for a 45-day public review period starting 24 July 2020. During this period, the public may submit comments on the Draft EIS and Draft FONPA. Written comments or requests for additional information about the proposed action and environmental review can be made via email or postal mail, as noted above. The 45-day public review and comment period for the Draft EIS and Draft FONPA will conclude on 8 September 2020.

Carver, Craig

From: Carver, Craig
Sent: Wednesday, August 19, 2020 8:22 AM
To: Carver, Craig
Subject: Draft EIS - Davison Army Airfield, Fort Belvoir, VA - Public Meeting & Public Comment Reminder

Dear Stakeholder,

This message is a reminder for the public teleconferences that will be held next **Monday, August 24, 2020** to provide the public and agency representatives with the opportunity to learn about and comment on the Proposed Action and the Draft EIS. The teleconferences will be held from 1:00-3:00 PM and 6:00-8:00 PM. The teleconferences may be accessed toll-free by dialing **1-877-286-5733** and entering one of the following passcodes when prompted:

Teleconference 1: 1:00 – 3:00 PM; Passcode: 676-543-300#
Teleconference 2: 6:00 PM – 8:00 PM; Passcode: 668-662-26#

Both teleconferences will consist of a brief overview of the DAAF ADP and Draft EIS followed by a comment/question period. Comments and questions received during the teleconferences will be addressed appropriately in the Final EIS.

Copies of the Draft EIS and related documents, including fact sheets and posters to support the teleconference discussion, can be viewed and downloaded from Fort Belvoir's website at:

https://home.army.mil/belvoir/index.php/about/Garrison/directorate-public-works/environmental-division

After clicking on the link above, select the "Programs and Documents" tab, then click on the "National Environmental Policy Act (NEPA) Program" row. The DAAF Draft EIS is the first entry under the "Open for Public/Agency Review & Comment" heading.

The 45-day public comment period for the Draft EIS will end on **September 8, 2020**. Comments on the Draft EIS should be submitted on or before **September 8**. Comments may be submitted electronically to FortBelvoirNOI@usace.army.mil or by US Postal Service mail to:

US Army Fort Belvoir Directorate of Public Works
Attn.: DAAF Draft EIS
Environmental Division, Chief
9430 Jackson Loop, Building 1442, Rm #230
Fort Belvoir, VA 22060-5116

A comment form is available for download at the website provided above.

Additional details are provided in the original email below. Thank you for your participation in the NEPA process.

From: Carver, Craig
Sent: Friday, July 24, 2020 8:04 AM
To: Carver, Craig <Craig.Carver@aecom.com>
Subject: Draft EIS - Davison Army Airfield, Fort Belvoir, VA - Notice of Availability and 45-day public comment period

Dear Stakeholder,

On behalf of the US Army Corps of Engineers (USACE), Baltimore District, this message is to inform you that the Draft Environmental Impact Statement (EIS) for an Area Development Plan (ADP) at Davison Army Airfield (DAAF), US Army Garrison Fort Belvoir, Virginia is available for a 45-day day public review and comment period that begins on July 24, 2020 and ends on September 8, 2020. Notice is also being given for a Draft Finding of No Practical Alternative (FONPA) that the Army has prepared in compliance with Executive Order (EO) 11988, *Floodplain Management* and EO 11990, *Protection of Wetlands*. A copy of the official public notice announcing the availability of the Draft EIS and Draft FONPA is attached to this email.

USACE has prepared the Draft EIS in accordance with the National Environmental Policy Act of 1969 (NEPA) to evaluate the potential environmental impacts from the Army's Proposed Action to implement multiple construction, modernization, demolition, and infrastructure improvement projects identified in the DAAF ADP. The proposed ADP projects would be implemented over 30 years and would provide DAAF and its tenant organizations with the required facilities and infrastructure to fully support their ongoing missions. Copies of the Draft EIS, Draft FONPA, and related documents can be viewed and downloaded from Fort Belvoir's website at:

https://home.army.mil/belvoir/index.php/about/Garrison/directorate-public-works/environmental-division

The Army will host two public teleconferences on **August 24, 2020** to provide the general public and government regulatory agencies with the opportunity to learn about and comment on the Proposed Action and the Draft EIS. The first teleconference will be held from 1:00 PM–3:00 PM and the second will be held from 6:00 PM–8:00 PM. The teleconferences may be accessed toll-free by dialing 1-877-286-5733 and entering one of the following passcodes when prompted:

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The format and content of each teleconference will be the same. Callers will have the opportunity to ask questions and comment on the Proposed Action and Draft EIS during each teleconference. All comments and questions received during the teleconferences will be addressed in the Final EIS, as appropriate.

Comments on the Draft EIS may be submitted any time during the 45-day public comment period. A comment form is available for download at the website provided above. Completed comment forms can be submitted as an email attachment to FortBelvoirNOI@usace.army.mil or mailed via US Postal Service to:

US Army Fort Belvoir Directorate of Public Works
Attn.: DAAF Draft EIS
Environmental Division, Chief
9430 Jackson Loop, Building 1442, Rm #230
Fort Belvoir, Virginia 22060-5116

Comments on the Draft EIS and Proposed Action should be submitted by **September 8, 2020**.

Requests for a printed or electronic copy of the Draft EIS should be sent to the email or postal address provided above.

Your comments and questions on the Draft EIS and the Army's Proposed Action are strongly encouraged. All comments and questions will be addressed in the Final EIS as appropriate. This notification may be forwarded to others who may have an interest in the Proposed Action and the Draft EIS.

Thank you for your participation in the NEPA process.

*****PLEASE DO NOT REPLY TO THIS EMAIL*****

Carver, Craig

From: Carver, Craig
Sent: Wednesday, August 26, 2020 8:28 AM
To: Carver, Craig
Subject: Draft EIS - Davison Army Airfield, Fort Belvoir, VA - Public Comment Reminder
Attachments: DAAF ADP Draft EIS Summary - August 2020.pdf

Dear Stakeholder,

On behalf of the US Army Corps of Engineers, Baltimore District, this is a reminder that the 45-day public review and comment period for the Davison Army Airfield (DAAF) Area Development Plan (ADP) Draft Environmental Impact Statement (EIS) will end on **September 8, 2020**. Comments on the Draft EIS should be submitted on or before **September 8**.

Comments may be submitted electronically to FortBelvoirNOI@usace.army.mil or by US Postal Service mail to:

US Army Fort Belvoir Directorate of Public Works
Attn.: DAAF Draft EIS
Environmental Division, Chief
9430 Jackson Loop, Building 1442, Rm #230
Fort Belvoir, VA 22060-5116

A comment form is available for download at the website provided above.

The Draft EIS and associated documents can be viewed or downloaded from Fort Belvoir's website at:

https://home.army.mil/belvoir/index.php/about/Garrison/directorate-public-works/environmental-division

After clicking on the link above, select the "Programs and Documents" tab, then click on "National Environmental Policy Act (NEPA) Program." The DAAF Draft EIS is the first entry under the "Open for Public/Agency Review & Comment" heading.

A brief summary of the DAAF ADP and Draft EIS is also attached to this email.

Your comments and questions on the Draft EIS and the Army's Proposed Action are strongly encouraged. All comments and questions will be addressed in the Final EIS as appropriate.

Additional details regarding the DAAF ADP and Draft EIS are provided in the previous emails below. Thank you for your participation in the NEPA process.

From: Carver, Craig <Craig.Carver@aecom.com>
Sent: Wednesday, August 19, 2020 8:26 AM
To: Carver, Craig <Craig.Carver@aecom.com>
Subject: Draft EIS - Davison Army Airfield, Fort Belvoir, VA - Public Meeting & Public Comment Reminder

Dear Stakeholder,

This message is a reminder for the public teleconferences that will be held next **Monday, August 24, 2020** to provide the public and agency representatives with the opportunity to learn about and comment on the Proposed Action and the

Draft EIS. The teleconferences will be held from 1:00-3:00 PM and 6:00-8:00 PM. The teleconferences may be accessed toll-free by dialing **1-877-286-5733** and entering one of the following passcodes when prompted:

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Copies of the Draft EIS and related documents, including fact sheets and posters to support the teleconference discussion, can be viewed and downloaded from Fort Belvoir's website at:

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After clicking on the link above, select the "Programs and Documents" tab, then click on the "National Environmental Policy Act (NEPA) Program" row. The DAAF Draft EIS is the first entry under the "Open for Public/Agency Review & Comment" heading.

The 45-day public comment period for the Draft EIS will end on **September 8, 2020**. Comments on the Draft EIS should be submitted on or before **September 8**. Comments may be submitted electronically to FortBelvoirNOI@usace.army.mil or by US Postal Service mail to:

US Army Fort Belvoir Directorate of Public Works
Attn.: DAAF Draft EIS
Environmental Division, Chief
9430 Jackson Loop, Building 1442, Rm #230
Fort Belvoir, VA 22060-5116

A comment form is available for download at the website provided above.

Additional details are provided in the original email below. Thank you for your participation in the NEPA process.

From: Carver, Craig
Sent: Friday, July 24, 2020 8:04 AM
To: Carver, Craig <Craig.Carver@aecom.com>
Subject: Draft EIS - Davison Army Airfield, Fort Belvoir, VA - Notice of Availability and 45-day public comment period

Dear Stakeholder,

On behalf of the US Army Corps of Engineers (USACE), Baltimore District, this message is to inform you that the Draft Environmental Impact Statement (EIS) for an Area Development Plan (ADP) at Davison Army Airfield (DAAF), US Army Garrison Fort Belvoir, Virginia is available for a 45-day day public review and comment period that begins on July 24, 2020 and ends on September 8, 2020. Notice is also being given for a Draft Finding of No Practical Alternative (FONPA) that the Army has prepared in compliance with Executive Order (EO) 11988, *Floodplain Management* and EO 11990, *Protection of Wetlands*. A copy of the official public notice announcing the availability of the Draft EIS and Draft FONPA is attached to this email.

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facilities and infrastructure to fully support their ongoing missions. Copies of the Draft EIS, Draft FONPA, and related documents can be viewed and downloaded from Fort Belvoir's website at:

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US Army Fort Belvoir Directorate of Public Works
Attn.: DAAF Draft EIS
Environmental Division, Chief
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Fort Belvoir, Virginia 22060-5116

Comments on the Draft EIS and Proposed Action should be submitted by **September 8, 2020**.

Requests for a printed or electronic copy of the Draft EIS should be sent to the email or postal address provided above.

Your comments and questions on the Draft EIS and the Army's Proposed Action are strongly encouraged. All comments and questions will be addressed in the Final EIS as appropriate. This notification may be forwarded to others who may have an interest in the Proposed Action and the Draft EIS.

Thank you for your participation in the NEPA process.

*****PLEASE DO NOT REPLY TO THIS EMAIL*****

Draft EIS Comments

Comments received on the Draft EIS and Draft FONPA during the 45-day public review period, and the Government's responses to those comments, are summarized in **Tables A-2** through **A-7**. Copies of written comments as received follow the comment summary tables.

Table A-2: Federal Agency and Federally Recognized Native American Tribal Comments on the Draft EIS

Comment No.	Commenter Name	Commenter Organization / Title	Draft EIS Section No.	Topic	Comment	Government Response
Federal Agency Comments						
1	John V. Nelson	US Department of the Interior – Acting Regional Environmental Officer	General	Not Applicable (N/A)	The [US] Department [of the Interior] does not have comments [on the Draft EIS] at this time.	Comment noted. *No changes were made to the Final EIS to address this comment.*
2	Barbara Rudnick	USEPA Office of Communities, Tribes & Environmental Assessment – NEPA Program Coordinator	Sections 3.7 & 4.7, Water Resources	Mitigation and minimization measures	While the site has substantial constraints, we recommend that the Army continue to pursue potential opportunities to avoid and minimize both direct and indirect impacts to wetlands, streams, and floodplains during development of plans and highlight such opportunities and commitments in the Final Environmental Impact Statement (FEIS).	The Army will continue to evaluate and implement applicable mitigation and management measures as planning, design, and implementation of the proposed ADP projects continues. Specific Army commitments to mitigate the Proposed Action's potential adverse effect will be documented in the Army's Record of Decision (ROD) for the FEIS. *No changes were made to the Final EIS to address this comment.*
3			Sections 3.7 & 4.7, Water Resources	Wetlands / Permitting	Given these impacts, we also recommend that the Army consider early engagement for Clean Water Act Section 404 permitting so that avoidance and minimization measures can be fully evaluated; such engagement could ultimately streamline the permit process.	As noted in the EIS, the Army will obtain and adhere to applicable permits and other regulatory requirements as planning, design, and implementation of the proposed ADP projects continues. Permitting and regulatory coordination will include Fort Belvoir and federal, state, and local regulatory agencies and stakeholders, as applicable. *No changes were made to the Final EIS to address this comment.*
4			Sections 3.7 & 4.7, Water Resources	Impervious Surface / Stormwater	While the increase to the overall Accotink Creek watershed may not be large (a 0.4% increase), local impacts (a 45% increase) could potentially cause degradation of the stream, its tributaries or associated wetlands. We recommend early identification of minimization measures, potential best management practices, and appropriate monitoring strategies for these impacts. We recommend continuing conversations with appropriate resource agencies to identify measures to prevent water quality degradation and minimize impacts to wildlife habitat early in the design process.	As applicable, BMPs will be incorporated into projects to manage the quantity and quality of stormwater discharged from the project sites and prevent or minimize temporary and permanent adverse impacts on receiving water bodies. These measures will be identified and incorporated into the design of each project as planning, design, and implementation continues. The Army will continue to coordinate with Fort Belvoir and federal, state, and local regulatory agencies and stakeholders, as applicable, to identify and adhere to appropriate measures to prevent or minimize adverse impacts on water quality, wildlife, and habitat. *No changes were made to the Final EIS to address this comment.*
5			Chapter 2, Proposed Action	Proposed Action	It would be helpful if the rationale for the specific location and layout of [proposed facilities associated with the 12th AV BN] were further discussed, including how constraints such as the Primary and Transitional Surfaces impact potential facility configurations. For example, Project 6 includes an approximately 55,000-square-foot parking lot for privately owned vehicles in the floodplain on a site that is currently part of Anderson Park. Could this parking lot be constructed in another location that would reduce potential impacts? Could structured parking or other measures be considered to reduce the footprint of the parking facility in this location?	The ADP development process is briefly summarized in **Section 1.3** of the EIS and included a requirement analysis to establish each tenant's facility requirements and a course of action (COA) workshop to develop planning alternatives to address identified operational requirements, capability gaps, and future functional needs. The locations of the proposed ADP projects shown in the EIS are the outcome of the ADP process and reflect the facility configuration and layout that would best fulfill the Proposed Action's purpose and need and meet Army and tenant mission requirements, as stated in **Section 2.2.2.2** of the EIS. These requirements include removing facilities from the airfield safety surfaces, optimizing functional relationships between DAAF tenant facilities, minimizing encroachment on off-post land uses (particularly, nearby residences), maintaining appropriate Anti-terrorism/Force Protection (AT/FP) facility setbacks, and minimizing environmental impacts to the extent possible. Other courses of action (COAs) identified during development of the ADP would fail to satisfy the Proposed Action's purpose and need, and would not meet Army tenant mission requirements; these were dismissed from further consideration. The proposed ADP projects are presented at a conceptual level of detail to support the EIS analysis. Specific project details, such as building and pavement footprints, will be refined as planning, design, and implementation of the projects continues. Permeable pavement and other appropriate design features will be made later during the design phase. As noted in the EIS, the proposed projects would be implemented in accordance with applicable Fort Belvoir policies and regulatory/ permitting requirements. *No changes were made to the Final EIS to address this comment.*

Table A-2: Federal Agency and Federally Recognized Native American Tribal Comments on the Draft EIS

Comment No.	Commenter Name	Commenter Organization / Title	Draft EIS Section No.	Topic	Comment	Government Response
6	Barbara Rudnick	USEPA Office of Communities, Tribes & Environmental Assessment – NEPA Program Coordinator	Sections 3.7 & 4.7, Water Resources	Impervious Surface / Stormwater	It is unclear how the [quantitative] significance thresholds values [for impervious surface/stormwater] were selected; we recommend the FEIS include information detailing how these were determined.	The quantitative thresholds used in the Draft EIS for impervious surface and stormwater were based on similar thresholds used in the Fort Belvoir Real Property Master Plan (RPMP) EIS, to maintain consistency with the analyses presented in that document. The 1% increase threshold for the Accotink Creek watershed represents a substantial increase in impervious cover in that large and already-highly impervious watershed. The 15% threshold would move Main Post closer to the 20% impervious cover threshold at which water quality is severely degraded. The Main Post portion of the Accotink Creek watershed is already approximately 11% impervious. The following footnote was added for the impervious surface and wetland/RPA impact significance thresholds in **Section 4.7.1** of the Final EIS to address this comment: "9. Impact thresholds for impervious surface increases, wetlands, and RPAs are based on those used in the Fort Belvoir RPMP Final EIS to maintain consistency with the analyses presented in that document."
7			Sections 3.7 & 4.7, Water Resources	Water Resources	While the Accotink Creek watershed is large and the majority of the watershed is upstream, we recommend consideration of impacts to the smaller streams located on and downstream of DAAF.	Accotink Creek is used as the basis for analysis in the EIS because it ultimately receives all drainage from DAAF and therefore, its water quality is indicative of water quality in smaller streams on the airfield. Additionally, a wealth of existing data is available for Accotink Creek, while little or none has been prepared specifically for smaller streams on DAAF. Finally, Accotink Creek is a tributary of the Potomac River and ultimately, the Chesapeake Bay, which are all subject to applicable TMDLs and other regulatory requirements. Potential impacts on smaller streams on DAAF from the proposed ADP projects will be considered and evaluated as project planning and design continues, and during the preparation of applicable permit applications. *No changes were made to the Final EIS to address this comment.*
8			Sections 3.7 & 4.7, Water Resources	Impervious Surface / Stormwater	We recommend potential effects of the expected increases in impervious cover be further evaluated within the context of DAAF and the Main Post.	Changes in impervious cover in other areas of Main Post (outside DAAF) are considered in the Cumulative Impacts analysis presented in **Chapter 5** of the EIS. Projects occurring on Fort Belvoir are required to adhere to applicable stormwater management requirements to prevent or minimize impacts on receiving water bodies. *No changes were made to the Final EIS to address this comment.*
9			Section 3.7.4, Stormwater and Section 4.7, Water Resources.	Stormwater	The FEIS may benefit from a discussion of current or proposed physical, chemical or biological monitoring. **Section 4.7.3.2** indicates that Fort Belvoir would continue to sample runoff discharged to Accotink Creek and would implement corrective actions as needed to ensure pollutant concentrations remain within permitted thresholds. We recommend that this discussion be expanded to indicate the type of pollutants monitored, location, and frequency of sampling.	**Section 3.7.4** of the EIS summarizes the monitoring and sampling requirements of DAAF's VPDES Industrial Stormwater Major Permit #VA0092771 issued by the Virginia Department of Environmental Quality (VDEQ). *No changes were made to the Final EIS to address this comment.*
10			Sections 3.7 & 4.7, Water Resources	Stormwater / Mitigation / BMPs	The DEIS indicates that project designs would incorporate LID measures where feasible. We appreciate that the Army is considering such measures and recommend that where practicable, specific commitments and/or a robust discussion of anticipated measures be included in the FEIS.	The specific type and location of LID measures are not known at the current stage of project planning. However, as noted in the EIS, such measures would be included in the projects in accordance with applicable regulatory requirements, such as Section 438 of the EISA. Additionally, specific LID measures are not discussed in the EIS to provide flexibility for the incorporation of site- and project-specific measures that would be appropriate for the particular application, as well as the incorporation of new or currently unknown measures that may emerge in the future. *No changes were made to the Final EIS to address this comment.*

Table A-2: Federal Agency and Federally Recognized Native American Tribal Comments on the Draft EIS

Comment No.	Commenter Name	Commenter Organization / Title	Draft EIS Section No.	Topic	Comment	Government Response
11	Barbara Rudnick	USEPA Office of Communities, Tribes & Environmental Assessment – NEPA Program Coordinator	Sections 3.7.4 & 4.7, Stormwater and Water Resources	Stormwater	We recommend that it be clarified if pre-development reflects the current existing condition, if the existing stormwater infrastructure is currently adequate, and if additional enhancement should be considered to address stormwater management issues.	The term "pre-development" is used in the EIS to maintain consistency with the text of EISA Section 438. Existing stormwater infrastructure is briefly described in **Section 3.7.4** of the EIS; no deficiencies in the DAAF stormwater management system are noted in the Draft ADP. As noted in the EIS, LID measures would be incorporated into proposed ADP projects as applicable to manage stormwater generated on the project sites. Site-specific improvements to stormwater management infrastructure may also be incorporated into one or more of the proposed ADP projects as applicable if existing infrastructure on a project site is determined to be inadequate. However, system-wide improvements to DAAF stormwater management infrastructure are not included in the Proposed Action and therefore, are not evaluated in the EIS. *No changes were made to the Final EIS to address this comment.*
12			Section 4.7.3.5, Floodplains	Floodplains / Stormwater	If design objectives cannot be met within the ADP project footprint, the DEIS indicates that LID measures would be considered for application in areas downstream of DAAF. We recommend any known opportunities or areas that may be investigated for such measures be identified.	Such opportunities or areas are not known at the current stage of project planning, but will be considered as planning, design, and implementation of the proposed ADP projects continues. *No changes were made to the Final EIS to address this comment.*
13			Sections 3.7.5 / 4.7 (Wetlands and Streams) Sections 3.8.3 / 4.8 (Biological Resources)	Biological Resources	We recommend a discussion of how the aquatic resource impacts for each project were determined or were estimated. Additionally, it would be helpful to indicate the specific type of resource impacted (e.g. palustrine forested wetlands.)	Aquatic resource impacts are analyzed in the EIS in consideration of the proposed projects' scale, potential land disturbance, proximity to receiving water bodies, estimated stream disturbance, anticipated incorporation of BMPs and adherence to applicable regulatory and permitting requirements, knowledge of effects from projects of similar scale and scope, and other factors. Potential impacts on wetlands are presented at the planning level (i.e., collectively) in the EIS for ease of discussion and understanding; impacts on particular wetland types will be identified in greater detail through the permitting processes that will be conducted prior to the implementation of proposed ADP projects, as applicable. **Sections 3.8** and **4.8** of the Final EIS were revised as follows to address this comment: **Section 3.8.3.3:** First paragraph - added new sentence as last sentence of paragraph: "Aquatic habitat provided by lower-order streams on DAAF (i.e., tributaries of Accotink Creek) is likely non-existent or of low quality and inadequate to support noteworthy propagation of aquatic organisms." **Section 4.8.3.2**: added text to last sentence of first paragraph: "…Creek, which is the main source of higher-quality aquatic habitat on DAAF, and therefore, would have no potential to….". Added new sentence as second-to-last sentence of third paragraph: "Short-term adverse impacts on aquatic macroinvertebrate and fish habitat would remain below two percent." **Section 4.8.4.2**: revised the last two sentences of the first paragraph to: "There would be no direct adverse impacts on Accotink Creek, which is the main source of habitat on DAAF for aquatic macroinvertebrates and fish. Impacts on macroinvertebrate and fish habitat would remain below the two percent significance threshold defined in Section 4.8.1 and thus, would remain less than significant." **Section 4.8.5.2**: added the following as the second sentence of the paragraph: "There would be no direct adverse impacts on Accotink Creek, which is the main source of habitat on DAAF for aquatic macroinvertebrates and fish."
14			Section 4.7, Water Resources	Wetlands / Permitting	Although the DEIS indicates that efforts have been made to avoid and minimize impacts to aquatic resources, it is unclear whether the proposed impacts have been avoided and minimized to the maximum extent practicable, as required by the [CWA Section 404b(1)] Guidelines. Please consider the following as CWA 404 permitting will require selection of the least environmentally damaging practicable alternative (LEDPA):	*Government response to **Federal Agency Comments 14-17***: The proposed ADP projects have been sited to meet Army and tenant operational and safety requirements while minimizing adverse environmental impacts to the extent possible. Project design and measures (voluntary and regulatory-driven) to further minimize impacts will continue to be refined and incorporated as planning and design continues. The project phasing presented in the EIS reflects the Army's preferred implementation sequence for implementing the projects; provides an organizational framework for discussion of the projects in the EIS; minimizes disruption of airfield and tenant operations during the life of

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Comment No.	Commenter Name	Commenter Organization / Title	Draft EIS Section No.	Topic	Comment	Government Response
14 (con't.)	Barbara Rudnick	USEPA Office of Communities, Tribes & Environmental Assessment – NEPA Program Coordinator	Section 4.7, Water Resources	Wetlands / Permitting	- Several projects have substantial impacts. EPA recommends additional information be provided about the project sequence as proposed in the short-, mid-, and long-range phases and address whether impacts can be further minimized through alternative sequences. For example, is it possible to complete all upland projects first which may reduce aquatic impacts if other phases are no longer needed?	the ADP; and prioritizes those projects most critical to meeting the Proposed Action's purpose and need. Overall, these comments are largely outside the scope of the EIS analysis and additional considerations will be further addressed by the Army during the CWA Section 404 permitting process for the proposed ADP projects, as applicable. *No changes were made to the Final EIS to address these comments.*
			Section 4.7, Water Resources	Wetlands / Permitting	-To better understand if the proposed action represents the LEDPA, EPA recommends the alternatives analysis for CWA 404 include the evaluation of not only the area or length of potential impacts to waters of the United States (WOTUS) for each project, but also the necessary criteria to meet the project purpose such as siting requirements or safety restrictions, and the consideration of upland sites. While it may be too early in the design phase to include this information in the FEIS, we recommend that the alternatives analysis for impacts to WOTUS clarify avoidance on-site. Specific considerations include:	
			Section 4.7, Water Resources	Wetlands / Permitting	o 3.6 acres of wetlands disturbance is anticipated from Full Implementation of the ADP. Once it is clear that aquatic resource impacts have been avoided to the maximum extent practicable, we recommend focusing on minimization measures.	
15			Section 4.7, Water Resources	Wetlands / Permitting	o We recommend avoidance of wetland and stream impacts from the proposed road and trail crossings via siting and design; such measures include relocating crossings, upgrading existing inadequate crossings, minimizing impacts on stream habitat and biota, and maintaining wetland hydrology and aquatic life passage.	
16			Section 4.7, Water Resources	Wetlands / Permitting	To fully assess the impacts of the proposed project, as well as the adequacy of a compensatory mitigation proposal for unavoidable impacts to aquatic resources, detailed information will be needed regarding the quality and functions of the aquatic resources in the proposed project area. EPA recommends a baseline functional assessment of the aquatic resources to be impacted be conducted and the results be provided to better inform the review of the proposal. Examples can include, but are not limited to, hydrogeomorphic assessment, habitat, water quality, vegetation cover, etc. If available, this information can be added to the NEPA analysis or developed for later CWA 404 permitting.	
17			Section 4.7, Water Resources	Wetlands / Permitting	404 review will also consider the secondary and cumulative effects of the project as proposed. For CWA 404 review, we recommend that a thorough evaluation be undertaken, including documentation supporting the conclusions reached.	

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18	Barbara Rudnick	USEPA Office of Communities, Tribes & Environmental Assessment – NEPA Program Coordinator	Section 4.7, Water Resources	Wetlands / Permitting	To avoid or minimize potential secondary or cumulative effects of the proposed project to aquatic resources, EPA recommends opportunities to reduce impervious surface area by using pervious materials, LID, and other green infrastructure opportunities. We recommend the FEIS discuss what opportunities have been considered and will be incorporated into the final project plans.	See response to **Federal Agency Comment 10.** *No changes were made to the Final EIS to address this comment.*
19			Section 4.7, Water Resources	Resource Protection Areas (RPAs) / Stormwater	We recommend the FEIS describe in more detail how buffers will be incorporated within the project boundaries to protect the condition and functions of the remaining aquatic resources.	This level of detail is not known at the current stage of project planning, but will be considered and incorporated as project planning and design advances. Generally, the proposed ADP projects would be designed in accordance with Fort Belvoir's Installation Planning Standards and other established Fort Belvoir policies as applicable to prevent or minimize adverse environmental effects to the extent possible. *No changes were made to the Final EIS to address this comment.*
20			Section 4.7, Water Resources	Stormwater	The location of stormwater management facilities is unclear at this time. Please note that EPA discourages the use of WOTUS for the treatment of stormwater as it may result in degradation of those waters. We recommend an evaluation of feasible siting configurations for stormwater management facilities that avoid and minimize impacts to waters.	
21			Section 3.7.4, Stormwater	Stormwater	Please identify the three stormwater outfalls to Accotink Creek and include them on a map in the FEIS.	Text referencing three outfalls to Accotink Creek presented in the Draft EIS is incorrect; DAAF discharges stormwater from multiple outfalls that are regulated under its Major Industrial Stormwater Permit (VA0092771). The Final EIS was revised as follows to address this comment: - The first sentence of the last paragraph in **Section 3.7.3.2** was revised to change "regulated" to "representative". - The words "…through three outfalls…" were deleted from the first sentence of **Section 3.7.4** in the Final EIS. The revised sentence now reads as follows: "Stormwater generated on DAAF is conveyed through a network of inlets, pipes, culverts, ditches, and human-made as well as naturally occurring channels, and ultimately discharged to Accotink Creek."
22			Section 4.7, Water Resources	Wetlands	The need for such temporary impacts and whether such impacts can be fully restored warrants further discussion. Construction impacts may be long-term or permanent; for example, forested wetland impacts may take many years to recover and should be avoided if possible. Where temporary impacts are unavoidable, we recommend that the FEIS commit to use wetland construction best management practices (BMPs) to avoid impacts that may be long-term (e.g. compaction and rutting of soils) and development of detailed restoration plans.	Areas disturbed by construction activities that would not be built on or otherwise developed by the proposed projects would be replanted / recontoured to resemble pre-disturbance conditions. Vegetation in such areas would be replaced with native species in accordance with established Fort Belvoir policies and other applicable regulatory requirements. Applicable BMPs will be implemented to prevent or minimize temporary impacts during construction activities. *No changes were made to the Final EIS to address this comment.*
23			Section 4.7, Water Resources	Wetlands	EPA recommends the FEIS include a statement or narrative that describes how the proposal will adequately compensate for unavoidable permanent and temporary impacts to waters. To ensure a functional replacement of aquatic resources in the impacted watershed, we recommend using a mitigation bank whose primary service area encompasses the project location. Although credit availability may change in the future, we also recommend identifying suitable banks that may have appropriate credit availability in the service areas.	As discussed in the EIS, potential impacts on wetlands and streams from the proposed ADP projects would be mitigated through avoidance, compensation, and mitigation measures in accordance with applicable CWA Section 404 permitting requirements. The Army would consider appropriate mitigation measures that are available at the time each project potentially impacting wetlands and streams is permitted. *No changes were made to the Final EIS to address this comment.*

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24	Barbara Rudnick	USEPA Office of Communities, Tribes & Environmental Assessment – NEPA Program Coordinator	Section 4.7, Water Resources	RPAs	Given their function to trap pollutants in runoff and protect water quality, we concur that projects should be designed to minimize encroachment on RPAs and vegetation replaced to the extent practicable. We recommend stating whether any opportunities have been identified at DAAF or Fort Belvoir to improve RPAs.	Although Fort Belvoir recognizes RPAs on the installation, some of these areas, such as open areas between the runway and Santjer Road, may not necessarily fully function as a buffer due to existing development and/or a lack of substantial vegetative cover. Redevelopment of existing uses is an allowed use in RPAs, and ADP **Projects 5**, **18**, and **19** are identified as such in the EIS. As stated in **Section 4.7** of the EIS, the proposed ADP projects would be designed to avoid or minimize impacts on RPAs to the extent practicable and would be planned, conducted, and mitigated as applicable in accordance with the requirements of Fort Belvoir's *Guide for Resource Protection Areas (RPAs) and Stream Buffers* dated 21 September 2016. Such requirements could include the preparation of a Water Quality Impact Assessment (WQIA) in accordance with 9 VAC 25-830-140 and approval by the Fort Belvoir DPW-Environmental Division (ED), and on-site or off-site mitigation plantings at ratios specified in the guidance to replace vegetation removed from the RPA (**Table 4.7-4** of the EIS). Fort Belvoir DPW-ED continually evaluates opportunities to improve RPAs on the installation and will incorporate such opportunities into proposed ADP projects with potential to impact RPAs as applicable. The following was added as the last sentence of the third paragraph in **Section 3.7.5.2** of the Final EIS to address this comment: "Some areas designated as RPAs on Fort Belvoir and DAAF may not fully function as buffers due to the presence of existing development and/or a lack of vegetative cover."
25			Section 4.7, Water Resources	Floodplains	The DEIS states that facilities to be built in the 100-year floodplain would be designed to prevent the "downstream displacement of floodwaters." We recommend that this statement be explained as it appears flood waters would be increased.	As stated in **Section 4.7** of the EIS, modeled increases in the horizontal and vertical extents of the 100-year floodplain on DAAF were less than 2 feet, exclusive of measures that would be incorporated into each project potentially impacting the floodplain to prevent or minimize displacement of floodwaters on or downstream of DAAF. Applicable LID measures in combination with traditional stormwater management techniques would be incorporated into each ADP project potentially impacting the floodplain to ensure that increases in surface elevations within the regulatory floodplain are prevented or remain minimal. *No changes were made to the Final EIS to address this comment.*
26			Section 4.7, Water Resources	Floodplains	While the DEIS concludes that potential adverse impacts on property or life downstream would be limited in scope to DAAF and areas of Fort Belvoir that are undeveloped and in a conservation status, we recommend that the impact of increased flooding on downstream natural communities be discussed; including forest, wetlands, and the Accotink Wetlands Conservation Site. We also recommend clarification on potential impacts to downstream waters, including tributaries and the Potomac River.	As stated in the EIS, modeled increases in the floodplain are minimal and do not account for LID and other mitigation measures that would be incorporated into the proposed projects as applicable to prevent or minimize floodplain impact on or downstream of DAAF. As such, potential impacts from development of some of the proposed ADP projects in the 100-year floodplain on DAAF are anticipated to be minimal. Therefore, additional analysis of natural communities downstream of DAAF is outside the scope of the EIS. *No changes were made to the Final EIS to address this comment.*
27			Section 4.7, Water Resources; Appendix F, Draft Finding of No Practicable Alternative	Floodplains	We also recommend that the FEIS further discuss to what extent the proposed projects in the floodplain will be vulnerable to flooding, how the flooding risks were considered, and how this risk will be mitigated so as not to interfere with tenant operations. In the **[D]raft Finding of No Practicable Alternative**, it is stated that "critical elements of the proposed buildings would be raised above the level of the 100-year floodplain and carefully selected fill soils would be placed and compacted to situate buildings above base flood elevation." We recommend it be clarified if the 100-year floodplain is being used for the base flood elevation, and if not determined, when more detailed engineering and design studies would be prepared.	The specific flood mitigation measures for applicable ADP projects is not yet known at the current stage of planning. However, as stated in the EIS, vulnerabilities of the proposed ADP projects to flooding would be mitigated through a variety of current and evolving measures that would be incorporated into each project as planning and design continues. The 100-year floodplain on DAAF was modeled to provide a baseline for the EIS impact analysis. Best available information, including the modeled 100-year floodplain as well as other data, will be incorporated as project planning continues to design and engineer proposed facilities potentially affecting the floodplain and applicable measures to prevent or minimize floodplain impacts. *No changes were made to the Final EIS or FONPA to address this comment.*
28			Section 4.7, Water Resources	Floodplains	We recommend further discussion whether the 100-year flood is appropriate for facility design. We suggest consideration of project vulnerabilities to extreme weather patterns (i.e. hurricanes, increased flooding) and long-term maintenance needs. How are climate factors such as more frequent and larger storm events taken into account in the analysis to prevent impacts from flooding on mission readiness?	As planning and design of the proposed ADP projects continues, applicable environmental and climate considerations will be incorporated into the design of projects in the 100-year floodplain in accordance with DoD and Army facility and siting criteria. *No changes were made to the Final EIS to address this comment.*

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29	Barbara Rudnick	USEPA Office of Communities, Tribes & Environmental Assessment – NEPA Program Coordinator	Section 4.8, Biological Resources	Biological Resources	We recommend that the FEIS more clearly indicate expected impacts to the plant communities and clarify the thresholds of significance.	The significance threshold for Plant Communities is adapted from the Fort Belvoir RPMP EIS to maintain consistency with the analyses presented in that document. As shown on **Figure 4.8-1** of the DAAF ADP EIS, potential impacts on Plant Communities on DAAF from the Full Implementation Alternative would be small, and well under the 2 percent threshold for either DAAF or Fort Belvoir as a whole. Therefore, the threshold used in the Draft EIS will be retained. The Final EIS was revised as follows to address these comments: - "Vegetation communities" was revised globally to "plant communities" for editorial consistency. - **Section 3.8.2.1** was revised to read as follows: "Plant communities on DAAF include upland forests, wetlands (**Section 3.7.5.1**), and grasslands (**Figure 3.8-1**; **Table 3.8-1**). Fort Belvoir classifies plant communities by common characteristics and species within each community, and to facilitate their management. The classifications do not represent individual species or communities that are particularly unique or noteworthy. Plant communities cover a total of approximately 421 acres on DAAF and 8,219 acres on Fort Belvoir." - **Table 3.8-1** was added to summarize DAAF vegetation communities and their area of coverage on DAAF and Fort Belvoir. - **Sections 4.8.3.1**, **4.8.4.1**, and **4.8.5.1** were revised to add discussions of quantified short-term and long-term impacts on DAAF and Fort Belvoir plant communities, relate these impacts to the significance thresholds defined in **Section 4.8.1**, and note the following: the proposed ADP projects would be implemented in previously disturbed areas of the installation where vegetation consists of maintained grass and ornamental landscape vegetation (e.g., trees, shrubs); the removal of mature trees would be limited to those needed to accommodate the projects; areas of project sites not built on or otherwise developed would be replanted with native vegetation or otherwise returned to a permeable condition; trees removed by the proposed projects would be replaced in accordance with Fort Belvoir's *Tree Removal and Protection Policy #27*; and the distribution of the projects over multiple years would minimize impacts by ensuring that all impacts do not occur simultaneously. - **Tables 4.8-1**, **4.8-2**, and **4.8-3** were added to **Sections 4.8.3.1**, **4.8.4.1**, and **4.8.5.1**, respectively, to summarize impacts on DAAF and Fort Belvoir plant communities from the short-, mid-, and long-range ADP projects and the Full and Partial Implementation Alternatives. - **Tables ES-2** and **6.3-1** were revised to note that approximately 11.4 acres of vegetation would be permanently impacted by the proposed ADP project.
30			Section 4.8, Biological Resources	Biological Resources	While short-range ADP projects would collectively result in the removal of less than one acre of vegetation, the clearing from mid-range and long-range ADP projects is not discussed at 4.8.4.1. We recommend that the acreage and type of impacts be further described in that section.	
31			Section 3.8.2, Vegetation	Biological Resources	Vegetation communities (e.g. Beech Mesic-Mixed Oak Forest, Loblolly Pine Forest, etc.) are briefly described and shown on figures; however, it would be helpful to discuss their potential area on DAAF, the extent of impacts (in percentage and acreage) to each community to assess potential effects.	
32			Section 4.8, Biological Resources	Biological Resources	The threshold of significance for Plant Communities and Forest Resources would also benefit from further discussion. The stated standard was "the permanent loss of more than two percent of the native plant communities at Fort Belvoir." We recommend that this be clarified to address whether this reflects the overall acreage of Fort Belvoir, what that acreage is, how the percentage was determined, and whether impacts to a specific community type may be more appropriate to determine loss of resource.	
33			Table ES-2; Section 4.8, Biological Resources; Section 6.3, Comparison of the Alternatives	Biological Resources	Tables 6.3 1 and Table ES-2 state that long-term, less-than-significant adverse impacts on wildlife from loss of approximately 9 acres of vegetation and forested habitat are anticipated. It would be helpful to clarify the expected acreage of tree clearing overall and that in landscaped or maintained areas.	
34			Section 4.8, Biological Resources	Biological Resources	Further, we recommend clarification of temporary impacts, including estimated area of impacted communities and whether replacement vegetation would reflect the impacted community or type.	
35			Section 4.8, Biological Resources	Biological Resources	The discussion of impacts to Aquatic Macroinvertebrates/Fish and for Wildlife does not appear to reflect the significance thresholds selected for these resources (generally, greater than 2% habitat loss). For clarity, we recommend discussing the impacts in relation to the thresholds selected.	See response to **Federal Agency Comment 13**.
36			Section 4.8, Biological Resources; Section 6.2.2, Minimization Measures	Biological Resources	We recommend further discussion and mitigative measures specific to the impacts on the grasshopper sparrow.	Specific mitigation measures for the grasshopper sparrow have not been determined at the current stage of planning but will be identified and incorporated through coordination with Fort Belvoir and other applicable stakeholders that would be identified as project planning and design advances. *No changes were made to the Final EIS to address this comment.*

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37	Barbara Rudnick	USEPA Office of Communities, Tribes & Environmental Assessment – NEPA Program Coordinator	Section 4.8, Biological Resources	Biological Resources / Special Natural Areas	It is stated that although BBMC habitat would be permanently removed by the projects, other areas of suitable habitat for those species would remain elsewhere on DAAF and the installation. Are these areas permanently protected? Are there areas onsite that have been identified where replacement BBMC buffers can be provided on DAAF or Fort Belvoir as discussed?	Fort Belvoir reviews all construction projects prior to implementation and diverts projects from sensitive environmental resources, such as BBMC habitat, to the extent feasible when considered with Army and tenant mission requirements. Measures to avoid or minimize impacts on BBMC habitat from the proposed ADP projects would be evaluated and incorporated to the extent feasible as project planning and design continues. Fort Belvoir continually evaluates the suitability of applicable on-post areas for resource protection, replacement, and restoration, and will continue to do so for BBMC habitat as the proposed ADP projects and other, unrelated projects are implemented on Fort Belvoir. *No changes were made to the Final EIS to address this comment.*
38			Sections 3.8 & 4.8, Biological Resources; Appendix C, DAAF Wetlands and Waters of the US Delineation Report	Wetlands	The DEIS states that a survey of the southwest portion of DAAF was conducted in 2017 to document the presence of a Coastal Piedmont Acid Seepage Swamp and this was included in Appendix C, but this was not found in the appendix referenced. We recommend that the FEIS discuss the location or occurrence and whether impacts may occur.	The Final EIS was revised as follows to address this comment: - A footnote was added to **Section 3.7.5.1, *Wetlands and Streams***, to direct the reader to the discussion of the Coastal Plain/Piedmont Acidic Seepage Swamp in **Section 3.8.4.2, *Rare Ecological Communities***. - The second and last paragraphs of **Section 3.8.4.2** were revised with the following (new text in red): "…discharge. Vegetation occurring in these swamps include a variety of overstory trees, small trees and shrubs, and herbaceous species such as red maple and blackgum (*Nyssa sylvatica*), tulip-tree (*Liriodendron tulipifera*), loblolly pine (*Pinus taeda*), highbush blueberries (*Vaccinium spp*.), swamp azalea (*Rhododendron viscosum*), smooth winterberry (*Ilex laevigata*), cinnamon fern (*Osmundastrum cinnamomeum var. cinnamomeum*), and netted chain fern (*Woodwardia areolata*). "The Coastal Plain/Piedmont Acidic Seepage Swamp covers approximately 1.4 **acres** on the southern side of DAAF (**Figure 3.7-1**)." - The following was added as the first paragraph of **Section 4.8.3.5**: "None of the short-term ADP projects would be implemented near the Coastal Plain/Piedmont Acidic Seepage Swamp on the southern side of DAAF (Figures 4.8-3 and 4.8-4) and therefore, would have no potential to affect that resource." - The following was added as the first paragraph of **Section 4.8.4.5**: "The eastern segment of **Project 24** near its proposed intersection with Britten Drive would be implemented near the Coastal Plain/Piedmont Acidic Seepage Swamp (**Figure 4.8-1**). This project would be designed to avoid impacts on this resource; adherence to applicable E&SC and stormwater management BMPs would also prevent temporary impacts during construction." - The first sentence of **Section 4.8.5.5** was revised as follows: "Mid-range ADP projects under the Partial Implementation Alternative would have no impacts on rare ecological communities or special natural areas at DAAF or Fort Belvoir because none of the projects would temporarily or permanently encroach on the Coastal Plain / Acidic Seepage Swamp or FWC, ABWR, or BBMC buffers (**Figure 4.8-4**)."
39			Section 4.8, Biological Resources	Biological Resources	4.8.3.4 indicates that Projects 5 and 6 would occur in proximity to Accotink Creek, which has the potential to provide suitable habitat for the wood turtle. Species surveys would be conducted in the vicinity of those projects prior to their implementation "if determined necessary during continued project planning and design." We recommend indicating who would make this determination and at what point in the process.	The following text was added to the first paragraphs of **Sections 4.8.3.4, 4.8.4.4**,and **4.8.5.4** of the Final EIS to address this comment: "Prior to implementation, each project would be reviewed by Fort Belvoir DPW-ED, which would request the preparation of site-specific species and/or habitat surveys if potential impacts on rare, threatened, and endangered species and their habitats are identified." Also see **State Agency Comment 46** noting that the Virginia Department of Wildlife Resources (VDWR) does not anticipate this project to result in adverse impacts upon Wood turtles.
40			Section 4.8, Biological Resources	Biological Resources	The DEIS states that construction contractors would adhere to the requirements of Fort Belvoir's invasive species management program to prevent the introduction of invasive species to the extent possible. Please expand this discussion to briefly describe how the invasive species program is managed and the how the work of contractors is reviewed or overseen by Fort Belvoir.	

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41	Barbara Rudnick	USEPA Office of Communities, Tribes & Environmental Assessment – NEPA Program Coordinator	Section 4.6, Geology, Topography, and Soils	Soils	Project 8 would remove an earthen knoll as it violates the airfield's Transitional Surface. As described, approximately 337,000 cubic yards of soil would be excavated and removed. We recommend expanding the discussion to address: where this material would be taken; is it expected to be contaminated; are there opportunities for beneficial reuse on or offsite; and how many truckloads of material would be expected? Section 4.6.3.3 indicates Project 8 would require clean fill soils from outside sources; we recommend stating why clean fill soils are necessary.	As stated in **Section 4.6.3.3** of the EIS, "Under the Alternatives, potential adverse effects on soils, including soil loss, contamination, and structural alteration, would be managed at a project level....soils associated with each individual project site would be screened and sampled for waste characterization prior to any land disturbance. All contaminated soils in exceedance of regulatory thresholds would be managed accordingly for transportation and disposal at a permitted facility offsite. Other excavated soils would be transported offsite for disposal." Soils removed during ground-disturbing activities at Fort Belvoir are routinely exported from the installation for appropriate reuse, or disposal at permitted off-post facilities, in accordance with established Fort Belvoir policies and applicable regulatory requirements. Specific disposal facilities have not been selected at the current stage of project planning, and would be the responsibility of the selected project contractor. "Clean fill soils" is used to generically characterize replacement soils that would be imported from outside Fort Belvoir to grade and level the **Project 8** site and mimic the surrounding topography following the removal of the knoll. The importation and use of contaminated or impacted soils for such applications on Fort Belvoir is prohibited, and is generally not considered good practice. The number of truckloads that would be required to remove existing soils or import fill soils for **Project 8** has not been determined at the current stage of planning. The following text was added to **Sections 4.6.3.3** (8th paragraph), **4.6.4.3** (4th paragraph), and **4.6.5.3** (3rd paragaph) of the Final EIS to address this comment: "Construction contractors would prepare waste profiles for soils being transported off-site for disposal. Profiles and manifests would be signed by Fort Belvoir DPW-ED staff."
42			Section 4.10, Hazardous Materials and Waste	Hazardous Materials	We recommend that further detail regarding the potential opportunities that may exist to improve, consolidate, or upgrade hazardous material storage areas with the modernization of the facilities, including Projects 2, 3, 4, and 6 be considered in the FEIS.	The EIS assumes that current hazardous material storage methods and equipment would be incorporated into the proposed new or modernized facilities at DAAF, and would represent an improvement over earlier, older methods and equipment that are likely in use at the airfield. However, specific details about hazardous material storage methods and equipment are not known at the current stage of project planning and would continue to be refined as project planning and design continues. *No changes were made to the Final EIS to address this comment.*
43			Section 4.10, Hazardous Materials and Waste	Hazardous Materials	We recommend additional discussion of potential impacts to water resources from leaks and/or flooding of tanks that are located in or adjacent to the floodplain.	As stated in the EIS, new aboveground or underground storage tanks included in the proposed ADP projects would include all necessary safety and secondary containment equipment, and would be installed and operated in accordance with applicable regulatory requirements. The analysis of accidental leaks or flooding of tanks during storms or other unforeseen events is outside the scope of the EIS. The following text was added to **Sections 4.10.3.4** (4th paragraph) and **4.10.4.4** (3rd paragraph) to address this comment: "As applicable, petroleum storage tanks associated with facilities proposed for construction in or near the 100-year floodplain (**Project #** [as applicable]) would be installed above the base flood elevation and would include additional measures as warranted to prevent or minimize the potential for accidental leaks during a flood event."
44			Section 4.10, Hazardous Materials and Waste	Hazardous Materials	We recommend clarifying if any applicable requirements or policies would require storing ASTs outside of potential flood areas or prohibit storage adjacent to waters.	New aboveground or underground storage tanks included in the proposed ADP projects would include all necessary safety and secondary containment equipment, and would be installed and operated in accordance with applicable regulatory requirements. This would include storage tanks in or near flood areas or adjacent to or near surface water bodies. *No changes were made to the Final EIS to address this comment.*

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Comment No.	Commenter Name	Commenter Organization / Title	Draft EIS Section No.	Topic	Comment	Government Response
45	Barbara Rudnick	USEPA Office of Communities, Tribes & Environmental Assessment – NEPA Program Coordinator	Section 6.2, Mitigation and Minimization Measures; Appendix F, Draft Finding of No Practicable Alternative	FONPA	Appendix F, the **Draft Finding of No Practicable Alternative**, describes several potential BMPs to minimize impacts on floodplain wetlands, including use of retaining walls, subsurface infiltration beds, vegetated retention, permeable pavement for parking lots, use of existing paved areas for construction access and staging and others. While some of these may be discussed throughout the DEIS, we recommend that these likely or potential mitigative measures be incorporated in the Mitigation section of the FEIS.	Applicable mitigation and minimization measures that the Army will commit to adopting or implementing for resources that would potentially be impacted by the proposed ADP projects will be memorialized in the ROD that will be issued for the Proposed Action following release of the Final EIS. *No changes were made to the Final EIS to address these comments.*
46			Section 6.2.3, Mitigation Measures	Mitigation / Minimization Measures	As the FEIS is a planning tool, we suggest identifying possible mitigation opportunities. For example, permanent loss of RPAs would require mitigation in the form of plantings on-site or buffer enhancement elsewhere on Fort Belvoir. As previously noted, we recommend describing whether areas have been identified for buffer enhancement.	
47			Section 6.2.3, Mitigation Measures	Mitigation / Minimization Measures	Mitigation of cumulative impacts through "out-of-kind" mitigation was briefly discussed, such as adding acreage to the protected Forest and Wildlife Corridors. Are there opportunities for protecting additional areas for mitigation?	
48			Section 3.1.2, Socioeconomics; Section 3.1.5, Traffic and Transportation	Environmental Justice / Transportation	We recommend that the FEIS include a figure to show the location of potential EJ communities in relation to the Proposed Action. For Traffic and Transportation, we recommend that the FEIS discuss the likely increase and traffic routes for construction vehicles and how much traffic is expected to be increased, including anticipated numbers of trucks for projects that requiring trucking of fill soils to or from the site (e.g. Projects 5, 6, and 8).	Resources dismissed from detailed analysis in the EIS, including Environmental Justice and Transportation, and the rationale for their dismissal, are discussed in **Section 3.1** of the EIS in accordance with 40 CFR Part 1506.3. The Proposed Action is not anticipated to disproportionately adverse effect Environmental Justice communities because most potential impacts would be confined to DAAF and Fort Belvoir. The requested level of detail for traffic and transportation impacts is not available at the current stage of project planning and design. However, the distribution of the proposed ADP projects over 30 years would minimize construction-related impacts on the local and regional off-post transportation network near DAAF and Fort Belvoir. Impacts on these resources would be analyzed in separate NEPA documentation if the Army or Fort Belvoir later determines that the proposed projects would have the potential to meaningfully impact them. *No changes were made to the Final EIS to address this comment.*
49			Sections 3.3 & 4.3, Historic and Cultural Resources	Cultural Resources	We suggest that the extent of such surveys for archaeological resources in the areas expected to be disturbed be clarified in the FEIS and whether additional surveys may be performed.	Phase I archaeological investigations for the entirety of Fort Belvoir were completed in 1994. The Virginia Department of Historic Resources (VDHR) subsequently concurred that these surveys had been completed. As stated in **Section 3.3.6** of the EIS, five non-listed and non-eligible sites have been documented on DAAF. All but one of the DAAF sites (44FX1811) are separated from the APE by Accotink Creek and would not be affected by ground disturbing activities associated with the Proposed Action. The following sentences were added to the first and second paragraphs, respectively, of **Section 3.3.6** in the Final EIS: "The SHPO concurred that Phase I archaeological investigations at Fort Belvoir were complete following the completion of an installation-wide Phase I survey in 1994.....With the exception of ineligible Site 44FX1811, the archaeological sites on DAAF are separated from the APE by Accotink Creek and would have no potential to be affected by ground-disturbing activities." The following sentences were added to the second paragraph of **Section 4.3.3.2**, and to **Sections 4.3.4** and **4.3.5**: "The project sites would be reviewed for archaeological potential during Fort Belvoir DPW-ED's review of the site and construction plans for each project. Additional archaeological surveys would be conducted if determined necessary by these reviews prior to implementation of the proposed projects."

Table A-2: Federal Agency and Federally Recognized Native American Tribal Comments on the Draft EIS

Comment No.	Commenter Name	Commenter Organization / Title	Draft EIS Section No.	Topic	Comment	Government Response
Federally Recognized Native American Tribal Comment						
50	Terry Clouthier	Pamunkey Indian Tribe – Cultural Resources Director	Section 3.3, Cultural Resources	Archaeological Resources / Surveys	Have there been any areas within the Davison Army Airfield (DAAF) which have not been subject to archaeological survey? If the answer to this question is affirmative, will these areas be subject to archaeological survey prior to any ground disturbing activities? My office recommends archaeological survey in any areas not previously surveyed.	Phase I archaeological investigations for the entirety of Fort Belvoir were completed in 1994. The Virginia Department of Historic Resources (VDHR) subsequently concurred that these surveys had been completed. As stated in **Section 3.3.6** of the EIS, five non-listed and non-eligible sites have been documented on DAAF. All but one of the DAAF sites (44FX1811) are separated from the APE by Accotink Creek and would not be affected by ground disturbing activities associated with the Proposed Action. The following text was added to **Sections 3.3.6** and **4.3.3.2** of the Final EIS to address this comment: - **Section 3.3.6**: "...survey and investigation (Fort Belvoir, 2015a). VDHR concurred that Phase I archaeological investigations at Fort Belvoir were complete following the completion of an installation-wide Phase I survey in 1994. "[...] Information regarding each respective site is summarized in **Table 3.3-2**. With the exception of ineligible Site 44FX1811, the archaeological sites on DAAF are separated from the APE by Accotink Creek and would have no potential to be affected by ground-disturbing activities. As land..." - **Section 4.3.3.2**, second paragraph: "The project sites would be reviewed for archaeological potential during Fort Belvoir DPW-ED's review of the site and construction plans for each project. Additional archaeological surveys would be conducted if determined necessary by these reviews prior to implementation of the proposed projects."

Table A-3: State Agency Comments on the Draft EIS

Comment No.	Commenter Name	Commenter Agency / Organization / Title	Draft EIS Section No.	Topic	Comment	Government Response
1	Cina Dabestani	VDOT - NOVA District	General	General	After careful review of the subject project's documents, VDOT-NoVa has no comments to offer at this time.	Comment noted. *No changes were made to the Final EIS to address this comment.*
2	Arlene Fields Warren	Virginia Department of Health - Office of Drinking Water, GIS Program Support Technician	Sections 3.7/4.7, Water Resources	Water Resources	Project Name: Draft EIS - Davison Army Airfield Project #: N/A UPC #: N/A Location: Fairfax Co. VDH – Office of Drinking Water has reviewed the above project. Below are our comments as they relate to proximity to public drinking water sources (groundwater wells, springs and surface water intakes). Potential impacts to public water distribution systems or sanitary sewage collection systems must be verified by the local utility.	Comment noted. *No changes were made to the Final EIS to address this comment.*
					There are no public groundwater wells within a 1-mile radius of the project site. The following surface water intakes are located within a 5 mile radius of the project site: PWS ID Number System Name Facility Name 6059501 FAIRFAX CO. WATER AUTHORITY OCCOQUAN RESERVOIR INTAKE	Comment noted. The Proposed Action would have no potential to affect the Occoquan Reservoir, which is approximately 6 miles west of DAAF, or associated intakes. *No changes were made to the Final EIS to address this comment.*
					The project is not within the watershed of any public surface water intakes. * Comments from Environmental Epidemiology, Mr. Dwight Flammia, Ph.D. State Public Health Toxicologist were “no comments”. * Comments from OEHS Division of Shellfish Sanitation, Mr. Adam Wood were “The Division of Shellfish Safety has no comments to give as this project is well upstream of shellfish waters.” * No comments were received from Radiological Health, Mr. Steven Harrison, Director. * No comments were received from OEHS Onsite Sewage & Water Services, Mr. Lance Gregory.	Comments noted. *No changes were made to the Final EIS to address these comments.*
					Best Management Practices should be employed, including Erosion & Sedimentation Controls and Spill Prevention Controls & Countermeasures on the project site. Materials should be managed while on site and during transport to prevent impacts to nearby surface water.	Comments noted. As stated in **Section 4.7.3.3** of the Draft EIS, applicable BMPs would be used to manage the quality and quantity of stormwater discharged from the project sites and prevent or minimize adverse impacts on receiving water bodies. *No changes were made to the Final EIS to address these comments.*
3	N/A	VDEQ - Office of Environmental Impact Review (OEIR)	Chapter 7, Federal Consistency Determination	Coastal Zone Management	Based on our review of the consistency certification and the comments submitted by agencies administering the enforceable policies of the Virginia CZM Program, DEQ **conditionally concurs** [emphasis added] that the Proposed Action is consistent with the Virginia CZM Program.	Comment noted. The second paragraph of **Section 4.2.6** of the Final EIS was revised as follows to address VDEQ's conditional concurrence with the Army's Federal Consistency Determination for the Proposed Action: "VDEQ conditionally concurred with the Army’s determination in a letter dated 3 September 2020. A copy of the VDEQ concurrence letter is included in Appendix A. As a condition of VDEQ’s concurrence, the Army will prepare project-specific Federal Consistency Determinations prior to the implementation of each proposed ADP project and submit to VDEQ for further review and concurrence."

Table A-3: State Agency Comments on the Draft EIS

Comment No.	Commenter Name	Commenter Agency / Organization / Title	Draft EIS Section No.	Topic	Comment	Government Response
4	N/A	VDEQ - OEIR	Chapter 7, Federal Consistency Determination	Coastal Zone Management	No detailed site specific information or analysis is provided for the individual projects that make up the Proposed Action. Reviewer comments reflect the need for site specific information and coordination as project are implemented. For example, while the Virginia Marine Resources (VMRC) finds that it appears no permit will be required based on a desktop review of the information and mapping provided in the DEIS, VMRC notes that the submission of a Joint Permit Application with more detailed drawings and mapping, will determine the permitting requirements of federal, state, and local environmental agencies that participate in the JPA process.	Estimated resource-specific impacts, such as wetlands, from the proposed ADP projects are presented in the EIS as applicable. As stated in the EIS, the Army would comply with applicable permitting and regulatory requirements for the proposed ADP projects, including the submission of JPAs for projects potentially impacting wetlands. *No changes were made to the Final EIS to address this comment.*
5			Chapter 7, Federal Consistency Determination	Coastal Zone Management	Similarly, the DEQ Office of Watersheds and Local Government Assistance Program finds that there is insufficient information in the DEIS to determine whether individual projects comply with the Chesapeake Bay Preservation Act and the Regulations. Compliance with the Bay Act and Regulations would be determined upon the submission of required information on individual projects as they are implemented.	Estimated impacts on Chesapeake Bay RPAs from proposed ADP projects are presented in **Section 4.7** of the EIS. As noted in the EIS, ADP projects with potential to permanently impact RPAs on DAAF would be planned, conducted, and mitigated as applicable in accordance with the requirements of Fort Belvoir's *Guide for Resource Protection Areas (RPAs) and Stream Buffers* dated 21 September 2016. Such requirements could include the preparation of a WQIA in accordance with 9 VAC 25-830-140 and approval by the Fort Belvoir DPW-ED, and on-site or off-site mitigation plantings at ratios specified in the guidance to replace vegetation removed from the RPA. ADP **Projects 5**, **18**, and **19** are identified in the EIS as redevelopment projects in the RPA. *No changes were made to the Final EIS to address this comment.*
6			Chapter 7, Federal Consistency Determination	Coastal Zone Management	The CZMA Federal Consistency Regulations (15 CFR, Subpart C, § 930.36 (d)) states that, *"In cases where federal decisions related to a proposed development project or other activity will be made in phases based upon developing information that was not available at the time of the original consistency determination, with each subsequentphase subject to Federal agency discretion to implement alternative decisions based upon such information (e.g., planning, siting, and design decisions), a consistency determination will be required for each major decision. In cases of phased decisionmaking, Federal agencies shall ensure that the development project or other activity continues to be consistent to the maximum extent practicable with the management program."* Therefore, DEQ's concurrence with the Proposed Action is conditioned upon the Army's submission of project-specific consistency determinations to DEQ for review and concurrence in accordance with 15 CFR, Part 930, Subpart C, § 930.30 et seq. The consistency determinations shall contain the necessary information and analysis demonstrating project consistency with the enforceable policies of the Virginia CZM Program. If this condition is not met, then all parties shall treat the DEQ's conditional concurrence as an objection (15 CFR, Subpart A, § 930.4 et seq.)	Comment noted. See response to **State Agency Comment 3**.
7	N/A	Virginia Marine Resources Commission (VMRC)	Chapter 7, Federal Consistency Determination	Surface Water Permitting	The VWP [Virginia Water Protection] Permit program at the DEQ Northern Regional Office (NRO) finds that VWP permits may be required as ADP projects are implemented for proposed impacts to jurisdiction surface waters and wetlands.	As stated in the EIS, the Army would obtain and adhere to applicable regulatory and permitting requirements as the proposed ADP projects are implemented, including the VWP Permit Program when required. *No changes were made to the Final EIS to address this comment.*

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Comment No.	Commenter Name	Commenter Agency / Organization / Title	Draft EIS Section No.	Topic	Comment	Government Response
8	N/A	VDEQ - Northern Regional Office (NRO)	Chapter 7, Federal Consistency Determination	Construction General Permit	The VPDES program at DEQ-NRO finds that construction projects may require coverage under General Permit VAG83 for Discharges from Petroleum Contaminated Sites, Groundwater Remediation, and Hydrostatic Tests, for any hydrostatic tests on new piping, or for any potential dewatering during construction if petroleum contamination is encountered.	The proposed ADP projects would be subject to Fort Belvoir DPW-ED site plan review prior to implementation, which would identify necessary permits for each project, including the VAG83 Permit as applicable. As stated in the EIS, the Army would obtain and adhere to applicable regulatory and permitting requirements as the proposed ADP projects are implemented. *No changes were made to the Final EIS to address this comment.*
9	N/A	VDEQ - NRO	Chapter 7, Federal Consistency Determination	Stormwater Permitting	DEQ-NRO finds that the proposed DC Air National Guard (DCARNG) Aircraft Wash Rack may result in a discharge to surface waters. DEQ-NRO recommends that the wash rack be connected to the sanitary sewer system, otherwise any discharge to surface waters may require a VPDES permit.	The management of discharges from the proposed ADP projects will be addressed as the planning and design of each project continues. As stated in the EIS, the Army would adhere to applicable regulatory and permitting requirements as the proposed ADP projects are implemented. Text was added to the Final EIS as follows to address this comment: - **Section 2.1.1**, **Project 6**, second paragraph; **Section 2.1.2**, **Project 15**; **Section 2.1.3**, **Project 20**, first paragraph: "The new aircraft wash rack would discharge to the airfield's sanitary sewer system, and would include an oil/water separator (O/WS) to manage associated runoff in accordance with applicable regulations." - **Section 3.74**, second paragraph: "Runoff from existing aircraft wash racks on DAAF is discharged to the airfield's sanitary sewer system. New aircraft wash racks constructed on DAAF require the installation of an O/WS to manage associated runoff in accordance with applicable regulations." **Section 4.7.3.2**, fourth paragraph: "The aircraft wash rack included in **Project 6** would discharge to the airfield's sanitary sewer system, and would include an O/WS to manage runoff in accordance with applicable regulations." - **Section 4.7.4.2**, fourth paragraph: "The aircraft wash racks included in **Projects 15** and **20** would discharge to the airfield's sanitary sewer system, and would include an O/WS to manage runoff in accordance with applicable regulations." - **Section 4.7.5.2**, third paragraph: "The aircraft wash rack that would be constructed by **Project 15** would discharge to the airfield's sanitary sewer system, and would include an O/WS to manage runoff in accordance with applicable regulations."
10			Chapter 7, Federal Consistency Determination	Wetlands Permitting	The Army must coordinate with DEQ-NRO prior to the implementation of individual ADP projects. Coordination is initiated upon the submission of a Joint Permit Application (JPA) to VMRC which serves as the clearinghouse for review by DEQ, VMRC, local wetlands board and the U.S. Army Corps of Engineers (Corps). VWP Permit staff at DEQ-NRO will review the proposed projects in accordance with the VWP Permit program regulations and guidance.	As stated in the EIS, the Army would adhere to applicable regulatory and permitting requirements as the proposed ADP projects are implemented, including the submission of JPAs for projects potentially impacting wetlands. *No changes were made to the Final EIS to address this comment.*
11			Chapter 7, Federal Consistency Determination	Stormwater Permitting	Projects must comply with the existing VPDES individual permit for the facility (VA0092771). If it is determined that a project will result in changes affecting coverage under the individual permit (e.g. adding or removing outfalls, adding or removing discharges), the Army must initiate consultation with DEQ-NRO.	As stated in **Section 4.7.3.3** of the EIS, DAAF's Major Industrial Stormwater Permit and corresponding SWPPP would be updated as needed as each of the proposed ADP projects are planned, built, and become operational to incorporate and address the new or expanded facilities, as well as account for changes associated with those facilities potentially affecting the quality and quantity of stormwater generated on the airfield. Fort Belvoir would continue to sample water discharged from DAAF to Accotink Creek and implement corrective actions as needed to ensure pollutant concentrations remain within regulatory thresholds. *No changes were made to the Final EIS to address this comment.*
12	N/A	VMRC	Chapter 7, Federal Consistency Determination	Wetlands	VMRC finds that based on a desktop review of the information and mapping provided, it appears that no permit will be required for tidal wetlands under its jurisdiction.	Comment noted. No impacts on tidal wetlands are anticipated from the implementation of the proposed ADP projects. *No changes were made to the Final EIS to address this comment.*

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Comment No.	Commenter Name	Commenter Agency / Organization / Title	Draft EIS Section No.	Topic	Comment	Government Response
13	N/A	VDEQ	Chapter 7, Federal Consistency Determination	Wetlands and Waterways Impacts (Mitigation and Minimization Measures)	In general, DEQ recommends that stream and wetland impacts be avoided to the maximum extent practicable. To minimize unavoidable impacts to wetlands and waterways, DEQ recommends the following practices: - Operate machinery and construction vehicles outside of stream-beds and wetlands; use synthetic mats when in-stream work is unavoidable.	The proposed ADP projects will be designed to prevent or avoid impacts on wetlands and other sensitive resources to the extent feasible, in consideration of Army and tenant mission requirements. Specific measures to minimize construction impacts will be identified by Fort Belvoir and the construction contractor prior to project implementation through coordination with the US Army Corps of Engineers, VDEQ, and other regulatory agencies as applicable during the CWA Section 404 permitting process. *No changes were made to the Final EIS to address these comments.*
14	N/A				- Preserve the top 12 inches of trench material removed from wetlands for use as wetland seed and root-stock in the excavated area. - Design erosion and sedimentation controls in accordance with the most current edition of the Virginia Erosion and Sediment Control Handbook. These controls should be in place prior to clearing and grading, and maintained in good working order to minimize impacts to State waters. The controls should remain in place until the area is stabilized.	
15	N/A				- Place heavy equipment, located in temporarily impacted wetland areas, on mats, geotextile fabric, or use other suitable measures to minimize soil disturbance, to the maximum extent practicable. - Restore all temporarily disturbed wetland areas to pre-construction conditions and plant or seed with appropriate wetlands vegetation in accordance with the cover type (emergent, scrub-shrub, or forested). The applicant should take all appropriate measures to promote revegetation of these areas. Stabilization and restoration efforts should occur immediately after the temporary disturbance of each wetland area instead of waiting until the entire project has been completed.	
16	N/A				- Place all materials which are temporarily stockpiled in wetlands, designated for use for the immediate stabilization of wetlands, on mats, geotextile fabric in order to prevent entry in State waters. These materials should be managed in a manner that prevents leachates from entering state waters and must be entirely removed within thirty days following completion of that construction activity. The disturbed areas should be returned to their original contours, stabilized within thirty days following removal of the stockpile, and restored to the original vegetated state.	
17	N/A				- Flag or clearly mark all non-impacted surface waters within the project or right-ofway limits that are within 50 feet of any clearing, grading, or filling activities for the life of the construction activity within that area. The project proponent should notify all contractors that these marked areas are surface waters where no activities are to occur. - Employ measures to prevent spills of fuels or lubricants into state waters.	

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Comment No.	Commenter Name	Commenter Agency / Organization / Title	Draft EIS Section No.	Topic	Comment	Government Response
18	N/A	VMRC	Chapter 7, Federal Consistency Determination	Wetlands, Water Resources	VMRC finds that based on a desktop review of the information and mapping provided, it appears that no permit [to impact state-owned subaqueous beds, tidal wetlands, or the beds of non-tidal perennial streams where the upstream drainage area is 5 square miles or greater] will be required.	Comment noted. No such impacts are anticipated to result from the Proposed Action. *No changes were made to the Final EIS to address this comment.*
19	N/A		Chapter 7, Federal Consistency Determination	Wetlands Permitting	The submission of a JPA to VMRC, with detailed drawings and mapping, is required to determine the permitting requirements of federal, state, and local environmental agencies involved in the JPA process.	As stated in the EIS, the Army would adhere to and comply with applicable regulatory and permitting requirements as the proposed ADP projects are implemented, including the submission of a JPA for projects potentially impacting wetlands. *No changes were made to the Final EIS to address this comment.*
20	N/A	VDEQ Office of Stormwater Management (OSWM)	Chapter 7, Federal Consistency Determination	Stormwater, Erosion and Sediment Control	The Army and its authorized agents conducting regulated land-disturbing activities on private and public lands in the state must comply with VESCL&R and 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).	Requirements for the preparation of and compliance with erosion and sediment control (E&SC) and SWM plans are stated in **Section 3.7.4** of the EIS. *No changes were made to the Final EIS to address these comments.*
21	N/A				Clearing and grading activities, installation of staging areas, parking lots, roads, buildings, utilities, borrow areas, soil stockpiles, and related land-disturbing activities that result in the total land disturbance of equal to or greater than 2,500 square feet in Chesapeake Bay Preservation Area would be regulated by VESCL&R. Accordingly, the Army must prepare and implement erosion and sediment control (ESC) plans as individual projects are implemented to ensure compliance with state law and regulations. The ESC plans must be submitted to DEQ-NRO for review for compliance.	
22	N/A				Land-disturbing activities that result in the total land disturbance of equal to or greater than 2,500 square feet in a Chesapeake Bay Preservation Area would be regulated by VSWML&R. Accordingly, the Army must prepare and implement a Stormwater Management (SWM) plans as individual projects are implemented to ensure compliance with state law and regulations. The SWM plans must be submitted to DEQ-NRO for review for compliance.	
23	N/A		General	Regulatory 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 62.1-44.15 et seq.]	Comment noted. *No changes were made to the Final EIS to address this comment.*
24	N/A		Chapter 7, Federal Consistency Determination	Stormwater, Erosion and Sediment Control	The operator or owner of a construction project involving land-disturbing activities equal to or greater than one acre is required to register for coverage under the VAR10 permit and develop a project-specific stormwater pollution prevention plan. [...] The SWPPP must be prepared prior to submission of the registration statement for coverage under the Construction General Permit and the SWPPP must address water quality and quantity in accordance with the VSMP Permit Regulations. [Reference: Virginia Stormwater Management Act 62.1-§44.15 et seq.] VSMP Permit Regulations 9 VAC 25-870-10 et seq.].	This requirement is stated in **Section 4.6.3.3** of the EIS. *No changes were made to the Final EIS to address this comment.*

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Comment No.	Commenter Name	Commenter Agency / Organization / Title	Draft EIS Section No.	Topic	Comment	Government Response
25	N/A	VDEQ OSWM	Chapter 7, Federal Consistency Determination	Stormwater	Projects must be constructed and operated in accordance with Fort Belvoir's MS4 permit (VAR040093).	This requirement is stated in **Section 3.7.4** of the EIS. *No changes were made to the Final EIS to address this comment.*
26	N/A	VDEQ-NRO	Chapter 7, Federal Consistency Determination	Stormwater, Erosion and Sediment Control	DEQ-NRO recommends the use of permeable paving for parking areas and walkways where appropriate, and denuded areas should be promptly revegetated following construction work.	Permeable pavement will be considered for appropriate applications in accordance with the Fort Belvoir Installation Planning Standards and DoD UFC as the planning and design of the proposed ADP projects advances. The revegetation of temporarily disturbed areas is addressed in **Section 4.7.3.4** of the EIS. *No changes were made to the Final EIS to address this comment.*
27	N/A	VDEQ Office of Watersheds and Local Government Assistance Programs (OWLGAP)	Section 7. Federal Consistency Determination	Federal Consistency, RPAs, Erosional and Sediment Control	Federal actions on installations located within Tidewater Virginia are required to be consistent to the maximum extent practicable with the performance criteria of the Regulations on lands analogous to locally designated RPAs and RMAs, as provided in 9 VAC 25-830-130 and 140, including the requirements to: - minimize land disturbance (including access and staging areas), - retain existing vegetation, - minimize impervious cover, - comply with the requirements of the Virginia Erosion and Sediment Control Handbook for land disturbance over 2,500 square feet, and - satisfy stormwater management criteria consistent with water quality protection provisions of the Virginia Stormwater Management Regulations. The Regulations (9 VAC 25-830-140 1.) limit land-disturbing activities in RPAs to water-dependent facilities/uses and redevelopment activities, and requires a site-specific RPA delineation, and the submittal of a Water Quality Impact Assessment (WQIA). This will require the development of site plan drawings and other necessary documentation for each project. Given the 30-year timeframe, the extensive scope of construction activities referenced in the ADP (as well as the general nature of the proposed construction activities, with no current site plans for review), and the potential for significant impacts to RPA buffers, review for consistency with the Bay Act and Regulations must be done on an individual project basis. DEQ-OWLGAP concludes that, as currently proposed, there is insufficient information in the DEIS to determine whether individual projects comply with the Bay Act and the Regulations. Compliance would be determined upon the Army's submission of the information described above for individual projects as they are implemented.	Estimated impacts on resources, including Chesapeake Bay RPAs, potentially resulting from the proposed ADP projects are provided in the EIS for each project as applicable. **Projects 5, 18**, and **19** are identified in the EIS as redevelopment projects within the RPA. Also see response to **State Comment 5**.
28	N/A	VDEQ Air Division	Chapter 7, Federal Consistency Determination	Air Quality (Mitigation and Minimization Measures)	The Army should take all reasonable precautions to limit emissions of NOx and VOCs, principally by controlling or limiting the burning of fossil fuels.	Measures to minimize emissions of NO_X and VOCs would be incorporated into the proposed ADP projects to the extent feasible and in compliance with applicable regulatory requirements as planning, design, and implementation of the projects continues. *No changes were made to the Final EIS to address this comment.*

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Comment No.	Commenter Name	Commenter Agency / Organization / Title	Draft EIS Section No.	Topic	Comment	Government Response
29	N/A	VDEQ Air Division	Chapter 7, Federal Consistency Determination	Air Quality (Mitigation and Minimization Measures)	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.	Comment noted. These measures will be incorporated into the proposed ADP projects as applicable as planning and design continues. *No changes were made to the Final EIS to address this comment.*
30	N/A		Chapter 7, Federal Consistency Determination	Air Quality	In accordance with 9 VAC 5-45-780, there are limitations on the use of "cut-back" (liquefied asphalt cement, blended with petroleum solvents) that may apply to paving activities associated with the project. Moreover, there are time-of-year restrictions on its use during the months of April through October in VOC emission control areas.	Paving associated with the proposed ADP projects would be conducted in accordance with applicable regulatory requirements. *No changes were made to the Final EIS to address this comment.*
31	N/A		Chapter 7, Federal Consistency Determination	Air Quality	If project activities include the open burning of construction material or the use of special incineration devices, this activity must meet the requirements under 9 VAC 5-130 et seq. of the Regulations for open burning, and may require a permit. The Regulations provide for, but do not require, the local adoption of a model ordinance concerning open burning.	None of the proposed ADP projects would involve open burning. *No changes were made to the Final EIS to address this comment.*
32	N/A		Chapter 7, Federal Consistency Determination	Air Quality	The installation of fuel burning equipment (e.g. boilers and generators), may require permitting from DEQ prior to beginning construction of the facility (9 VAC 5-80, Article 6, *Permits for New and Modified Sources*). The applicant should contact DEQ-NRO for guidance on whether this provision applies.	Boilers and generators associated with the proposed ADP projects would be installed, permitted, and operated in accordance with applicable regulatory requirements. *No changes were made to the Final EIS to address this comment.*
33	N/A	VDEQ - Division of Land Protection and Revitalization (DLPR)	Chapter 7, Federal Consistency Determination	Hazardous Waste	DEQ-DLPR...identified one solid waste permit and eleven petroleum releases within the project area which might impact individual project. See DEQ-DLPR comments attached for a detailed list of these sites.	The solid waste permit identified by the comment is associated with the former DeWitt Army Hospital on Fort Belvoir's South Post, which was vacated in 2011 and demolished in 2016. The Army notes that the 11 petroleum release sites identified in the comment are all designated as "closed." Fort Belvoir manages active and former/closed petroleum release sites on the installation in accordance with applicable regulatory requirements. As stated in **Section 4.10.3.7** of the EIS, construction plans for each ADP project and existing documentation for each project site would be reviewed by Fort Belvoir DPW to determine the potential for worker exposure to hazardous substances and/or applicable land use control (LUC) requirements at current or former DAAF Solid Waste Management Units (SWMUs). As needed, additional remediation would be conducted on or near the project sites to eliminate risk to workers. *No changes were made to the Final EIS to address this comment.*
34	N/A		Chapter 7, Federal Consistency Determination	Hazardous Materials	Any soil, sediment or groundwater that is suspected of contamination or wastes that are generated must be tested and disposed of in accordance with applicable federal, state, and local laws and regulations. All construction waste must be characterized in accordance with the Virginia Hazardous Waste Management Regulations prior to management at an appropriate facility.	As stated in the EIS, the Army would adhere to applicable regulatory and permitting requirements as the proposed ADP projects are implemented. *No changes were made to the Final EIS to address these comments.*

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Comment No.	Commenter Name	Commenter Agency / Organization / Title	Draft EIS Section No.	Topic	Comment	Government Response
35	N/A	VDEQ-DLPR	Chapter 7, Federal Consistency Determination	Hazardous Materials	Petroleum-contaminated soils and groundwater that is generated during project implementation must be characterized and disposed of properly.	
36	N/A				The removal, relocation or closure of any regulated petroleum storage tanks, either an aboveground storage tank (AST) or an underground storage tank (UST), must be conducted in accordance with the requirements of the Virginia Tank Regulations 9 VAC 25-91-10 et seq. (AST) and/or 9 VAC 25-580-10 et seq.	
37	N/A		Chapter 7, Federal Consistency Determination	Hazardous Materials / Waste	The installation and operation of regulated petroleum ASTs or USTs must be conducted in accordance with 9 VAC 25-91-10 et seq. and/or 9 VAC 25-580-10 et seq. Furthermore, the installation and use of ASTs with a capacity of greater than 660 gallons for temporary fuel storage (>120 days) during construction must follow the requirements in 9 VAC 25-91-10 et seq.	As stated in **Section 4.10.3.4** of the EIS, new petroleum storage tanks associated with the proposed ADP projects would be constructed, installed, operated, and maintained in accordance with their intended use as well as applicable permit and federal, state, Army, and Fort Belvoir regulatory requirements. *No changes were made to the Final EIS to address this comment.*
38	N/A		Chapter 7, Federal Consistency Determination	Hazardous Materials / Waste	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 9 VAC 20-81-620 (ACM) and 9 VAC 20-60-261 (LBP) must be followed.	As stated in **Section 4.10.3.6** of the EIS, ACM and LBP identified in the affected facilities would be removed by licensed contractors prior to project implementation in accordance with applicable federal, state, Army, and Fort Belvoir requirements, and disposed of at permitted off-post facilities. *No changes were made to the Final EIS to address this comment.*
39	N/A		Chapter 7, Federal Consistency Determination	Hazardous Materials / Waste	The identified Pollution Complaint (PC) cases should be further evaluated by the Army to establish the exact location, nature and extent of the petroleum release and its potential to impact individual project sites.	See response to **State Agency Comment 33**. *No changes were made to the Final EIS to address this comment.*
40	N/A		Chapter 7, Federal Consistency Determination	Solid Waste, Hazardous 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.	The proposed ADP projects would be implemented in accordance with Fort Belvoir's Integrated Solid Waste Management Plan, which includes objectives to divert construction and demolition waste to the maximum extent practicable towards the goal of 60 percent diversion in accordance with the DoD *Strategic Sustainability Performance Plan*. *No changes were made to the Final EIS to address this comment.*
41	N/A		Chapter 7, Federal Consistency Determination	Hazardous Materials	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.	As stated in **Section 3.10.5** of the EIS, the application of pesticides at Fort Belvoir, including herbicides, fungicides, insecticides, and rodenticides, is performed in accordance with the Army's integrated pest management procedures and the installation's Integrated Pest Management Program. Pesticide application on the installation would continue in this manner throughout the implementation of the proposed ADP projects. *No changes were made to the Final EIS to address this comment.*
42	N/A	Virginia Department of Conservation and Recreation - Division of Natural Heritage (DNH)	Chapter 7, Federal Consistency Determination	Biological Resources	DCR supports the implementation of and strict adherence to applicable state and local erosion and sediment control and stormwater management laws and regulations as stated in the DEIS (page 6-2), to minimize adverse impacts to the aquatic ecosystems as a result of the proposed activities.	Comments noted. *No changes were made to the Final EIS to address these comments.*

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Comment No.	Commenter Name	Commenter Agency / Organization / Title	Draft EIS Section No.	Topic	Comment	Government Response
43	N/A	Virginia Department of Conservation and Recreation - DNH	Chapter 7, Federal Consistency Determination	Biological Resources	DCR supports excluding development within the Fort Belvoir Forest and Wildlife Corridor (FWC) as stated in the DEIS (page 3-81), and the implementation of a time-of-year restriction for tree clearing to minimize adverse impacts to bat species as stated on page 6-3.	
44	N/A				DCR supports continued coordination with the US Fish and Wildlife Service (USFWS) and the Virginia Department of Wildlife Resources, to ensure compliance with protected species legislation due to the legal status of state- and federally-listed species documented near the project area (DEIS, Table 3.8-3).	
45	N/A				Contact DCR-DNH to secure updated information on natural heritage resources if the scope of the project changes or six months pass before the project is implemented, since new and updated information is continually added to the Biotics Data System.	
46	N/A	Virginia Department of Wildlife Resources (VDWR) / Department of Game and Inland Fisheries (VDGIF)	Chapter 7, Federal Consistency Determination	Biological Resources	VDWR does not anticipate this project to result in adverse impacts upon Wood turtles. DWR finds the Proposed Action to be consistent with the Fisheries Management Enforceable Policy of the Virginia CZM Program provided strict adherence to erosion and sediment control standards is maintained.	
47	N/A				VDWR recommends that tree removal and timbering activities adhere to a time-of-year restriction from April 1 through August 31 of any year to protect [the tri-colored bat] from harm.	Fort Belvoir adheres to a time-of-year restriction between 15 April to 15 September of any year to minimize impacts on the northern long-eared bat and other bat species. *No changes were made to the Final EIS to address this comment.*
48	N/A				VDGIF recommends additional coordination with DWR to ensure protection of the Wood turtle and its habitat, if instream work in Accotink Creek and/or work within naturally vegetated habitats within 900 feet of Accotink Creek are proposed.	As stated in **Section 4.8.3.4** of the EIS, species surveys would be conducted along Accotink Creek in the vicinity of applicable projects prior to their implementation if determined necessary during continued project planning and design. Based on the results of these surveys, avoidance or other mitigation measures would be incorporated into the projects to ensure that no adverse impacts on the wood turtle would occur. *No changes were made to the Final EIS to address this comment.*
49	N/A				VDGIF offers the following recommendations to minimize overall impacts to wildlife and natural resources: - Avoid and minimize impacts to undisturbed forest, wetlands, and streams to the fullest extent practicable. - Adhere to a time-of-year restriction protective of resident and migratory songbird nesting from March 15 through August 15 of any year for all tree removal and ground clearing.	As stated in the EIS, the proposed ADP projects would be implemented in accordance with applicable regulatory and permitting requirements, including those to prevent or minimize impacts on wildlife and natural resources. *No changes were made to the Final EIS to address these comments.*
50	N/A				- Adhere to erosion and sediment controls during ground disturbance. -Use matting made from natural organic materials such as coir fiber, jute, and/or burlap to minimize potential wildlife entanglements resulting from use of synthetic/plastic erosion and sediment control matting.	

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Comment No.	Commenter Name	Commenter Agency / Organization / Title	Draft EIS Section No.	Topic	Comment	Government Response
51	N/A	VDWR / VDGIF	Chapter 7, Federal Consistency Determination	Biological Resources	- Design stormwater controls to replicate and maintain the hydrographic condition of the site prior to the change in landscape. This should include, but not be limited to, o utilizing bioretention areas, and o minimizing the use of curb and gutter in favor of grassed swales. Bioretention areas (i.e. rain gardens) and grass swales are components of Low Impact Development (LID). They capture stormwater runoff as close to the source as possible, allow it to slowly infiltrate into the surrounding soil, and benefit natural resources by filtering pollutants and decreasing downstream runoff volumes.	
52	N/A				VDGIF recommends adherence to the currently approved Fort Belvoir Integrated Natural Resources Management Plan (INRMP).	The proposed ADP projects would be implemented in accordance with applicable policies set forth in Fort Belvoir's INRMP. *No changes were made to the Final EIS to address this comment.*
53	N/A	Virginia Department of Historic Resources (VDHR)	Chapter 7, Federal Consistency Determination	Cultural Resources	The Army initiated consultation with VDHR in 2018 on this undertaking pursuant to Section 106 of the National Historic Preservation Act, as amended, and its implementing regulation 36 CFR Part 800. Since that time, the Army has consulted with DHR on individual projects associated with the Davison Army Airfield Development plan under the same authority. DHR anticipates the Army will continue NHPA consultations as projects at DAAF mature beyond the conceptual phase.	The Army will continue to coordinate with VDHR in accordance with its Section 106 responsibilities as planning, design, and implementation of the proposed ADP projects continues. *No changes were made to the Final EIS to address these comments.*
54	N/A				The Army must to continue to consult with DHR under Section 106 on future undertakings occurring at DAAF.	
55	N/A	VDH-ODW	Chapter 7, Federal Consistency Determination	Groundwater	VDH-ODW concurs that there are no public groundwater wells within a 1-mile radius of the project site and DAAF is not within the watershed of any public surface water intakes.	Comment noted. *No changes were made to the Final EIS to address this comment.*
56	N/A		Chapter 7, Federal Consistency Determination	Water Resources	The Fairfax County Watery Authority (PWS ID 6059501) Occoquan Reservoir Intake is located within a 5-mile radius of DAAF.	Comment noted. The proposed ADP projects would have no potential to affect the Occoquan Reservoir or its intakes. *No changes were made to the Final EIS to address this comment.*
57	N/A		Chapter 7, Federal Consistency Determination	Erosion and Sediment Control, Surface Water	VDH-ODW recommends that Best Management Practices be employed on the project sites, including erosion and sediment controls and Spill Prevention Controls and Countermeasures. Materials should be managed on site and during transport to prevent impacts to nearby surface water.	Construction activities associated with the proposed ADP projects would comply with applicable E&SC and SPCC measures, as stated in the EIS. *No changes were made to the Final EIS to address this comment.*
58	N/A	VDCR Division of Dam Safety and Floodplain Management (DSFM)	Chapter 7, Federal Consistency Determination	Floodplains	All development within a Special Flood Hazard Area (SFHA) or floodplain, as shown on the locality's Flood Insurance Rate Map (FIRM), must be permitted and comply with the requirements of the local floodplain ordinance. Projects conducted by federal agencies within the SFHA must comply with federal Executive Order 11988: Floodplain Management.	The Army will coordinate with Fairfax County and other federal, state, and local agencies/stakeholders as applicable for proposed ADP projects that would potentially impact floodplains at DAAF. In parallel with the ADP EIS, the Army has prepared a FONPA explaining its decision to implement some of the proposed ADP projects in floodplains and wetlands, in accordance with EOs 11988 and 11990. *No changes were made to the Final EIS to address this comment.*

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Comment No.	Commenter Name	Commenter Agency / Organization / Title	Draft EIS Section No.	Topic	Comment	Government Response
59	N/A	VDCR DSFM	Chapter 7, Federal Consistency Determination	Floodplains	The Army must contact the local floodplain administrator for an official floodplain determination and comply with the community's local floodplain ordinance, including receiving a local permit. Failure to comply with the local floodplain ordinance could result in enforcement action from the locality. The Army is encouraged to reach out to the local floodplain administrator to ensure compliance with the local floodplain ordinance.	
60	N/A	Virginia Department of Aviation (DoAv)	General	N/A	DoAv has no comments on the Proposed Action.	Comment noted. *No changes were made to the Final EIS to address this comment.*
61	N/A	VDEQ	Chapter 7, Federal Consistency Determination	Mitigation and Minimization Measures	[VDEQ offers] several pollution prevention recommendations that may be helpful in the construction and operation of this facility: - Consider development of an effective Environmental Management System (EMS). An effective EMS will ensure that the proposed facility 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 (VEEP). VEEP provides recognition, annual permit fee discounts, and the possibility for alternative compliance methods.	The proposed facilities would be constructed and operated in accordance with efficiency measures outlined in the Fort Belvoir Installation Planning Standards and the DoD UFC. Generally, the replacement of older, outdated structures with newer, more efficient facilities would have a net benefit on energy and water efficiency at DAAF. *No changes were made to the Final EIS to address these comments.*
62	N/A	Virginia Department of Mines, Minerals and Energy			- 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.	
63	N/A	VDEQ			- 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.	
64	N/A				- Integrate pollution prevention techniques into the facility maintenance and operation. Maintenance facilities should be designed with sufficient and suitable space to allow for effective inventory control and preventative maintenance.	
65	N/A				New construction 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); - high-efficiency heating, ventilation, air conditioning systems; and - high-efficiency lighting systems and daylighting techniques.	

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Comment No.	Commenter Name	Commenter Agency / Organization / Title	Draft EIS Section No.	Topic	Comment	Government Response
66	N/A	VDEQ	Chapter 7, Federal Consistency Determination	Mitigation and Minimization Measures	The following recommendations will result in reduced water use associated with the operation of the facility: - Grounds should be landscaped with hardy native plant species to conserve water as well as lessen the need to use fertilizers and pesticides. - Convert turf to low water-use landscaping such as drought resistant grass, plants, shrubs and trees. - Low-flow toilets should be installed. - Consider installing low flow restrictors and aerators to faucets.	
67	N/A				- Improve irrigation practices by: o upgrading sprinkler clock; water at night, if possible, to reduce evapotranspiration (lawns need only 1 inch of water per week, and do not need to be watered daily; overwatering causes 85% of turf problems); o installing a rain shutoff device; and o collecting rainwater with a rain bucket or cistern system with drip lines. o Check for and repair leaks (toilets and faucets) during regular routine maintenance activities.	

Table A-4: Local / Regional Agency Comments on the Draft EIS

Comment No.	Commenter Name	Commenter Agency / Organization / Title	Draft EIS Section No.	Topic	Comment	Government Response
1	Camela Speer	Fairfax Co. Board of Supervisors	N/A	Draft EIS Public Meetings	Just checking. If I am looking at the correct page on the Ft Belvoir website, this email says the public information meetings are August 24 and the website says Aug 11. Am I looking at two different sets of meetings, or is one incorrect?	The EIS Contractor responded to Ms. Speer via email on 7/27 to provide additional clarification. Ms. Speer acknowledged the clarification via email later the same day. *No changes were made to the Final EIS to address this comment.*
2	Laura Arseneau	Fairfax County Department of Historic Resources	Sections 3.3 and 4.3, Historic and Cultural Resources	Historic and Cultural Resources Coordination	This is Laura Arseneau with Fairfax County Department of Planning and Development....I'm with the Heritage Resources Branch...We will be submitting written comments. My only comment is that the proposed APE is located in two of the county's historic overlay districts and we would recommend that the Architectural Review Board and that the County Heritage Resources staff be considered two different entities because they don't necessarily speak on behalf of each other. But we'll be submitting that in other comments as well.	Notifications announcing the availability of the Draft EIS during the 45-day public review and comment period were sent to Ms. Arseneau and David Buchta, Fairfax County Heritage Conservation Branch Manager, as well as the Fairfax County Executive, Planning Commission Chairman, Planning and Development Director, and Planning Division Director, among other County Staff. *No changes were made to the Final EIS to address this comment.*
3	N/A	Fairfax County Department of Planning and Development - Planning Division	General	Environmental / Ecological Stewardship	We commend Fort Belvoir for its environmental stewardship and recommend that the current planning effort reinforce and expand upon these efforts whenever possible. The extent of preservation efforts on the post and the continued presence of large areas of ecologically valuable land attest to the environmental sensitivity and the seriousness with which Fort Belvoir has pursued its guiding principle to "support the natural habitat." Fairfax County commends and fully supports these environmental initiatives.	Comment noted. *No changes were made to the Final EIS to address this comment.*
4	Leanna H. O'Donnell	Fairfax County Department of Planning and Development, Planning Division – Director	Sections 3.7 and 4.7, Water Resources	Chesapeake Bay Preservation Act / Resource Protection Areas (RPAs)	Fairfax County recognizes that the Department of the Army is not subject to the provisions of the Fairfax County stormwater management and Chesapeake Bay Preservation Ordinance (CBPO). However, Fairfax County continues to encourage the Army to meet the CBPO as described in Chapter 118 of the County Code, including conformance with the requirements for areas designated as Resource Protection Areas (RPAs) and Resource Management Areas. Environmental Quality Corridors (EQCs) as defined in Policy Plan Element of Fairfax County's Comprehensive Plan should also be considered.	See response to **Federal Agency Comment 24**.
5			Sections 3.7 and 4.7, Water Resources	Floodplains	DPWES Stormwater requests that the Army follow the floodplain management requirements contained in Fairfax County Zoning Ordinance, Article 2, Part 9, *Floodplain Regulations* and notify the county of any floodplain changes that might impact Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps.	The Army will coordinate with Fairfax County regarding proposed development in the 100-year floodplain on DAAF as planning and design of the proposed projects continues. As noted in **Section 3.7.6** of the EIS, FEMA will update its floodplain mapping of DAAF with data collected by USACE during preparation of the EIS. The following text was added to **Sections 4.7.3.5**, **4.7.4.5**, and **4.7.5.5** to address this comment: "The Army would adhere to Fairfax County floodplain management requirements in accordance with Article 2, Part 9 of the Fairfax County Zoning Ordinance and would notify the county of any floodplain changes that might impact FEMA Flood Insurance Rate Maps as planning and design of the proposed projects continues."
6			Sections 3.7 and 4.7, Water Resources	Floodplains	DPWES Stormwater requests that temporarily impacted floodplain areas be restored to a good forested condition to maximize their water quality and ecosystem service potential. DAAF development plans should include restoration, monitoring and management plans for the floodplain areas to be restored.	The following text was added to **Sections 4.7.3.5**, **4.7.4.5**, and **4.7.5.5** to address this comment: "Areas of the 100-year floodplain not built on or otherwise developed by the proposed projects would be replanted with native vegetation or restored to an otherwise impermeable condition to maintain the functions and values of those floodplain areas."

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Comment No.	Commenter Name	Commenter Agency / Organization / Title	Draft EIS Section No.	Topic	Comment	Government Response
7	Leanna H. O'Donnell	Fairfax County Department of Planning and Development, Planning Division – Director	DEIS Appendix F, page 4	Floodplains	Appendix F, page 4 of the DAAF Area Development Plan Draft Environmental Impact Statement (Draft EIS)...states that restoration planting densities for floodplains and resource protection areas will follow the recommendations in the Virginia Department of Conservation and Recreation *Riparian Buffers Modification and Mitigation Guidance Manual* (2006). We ask that instead the restoration planting densities for floodplains and RPAs follow the requirements found within the Fairfax County Chesapeake Bay Ordinance (Fairfax County Code Chapter 118) and Chapter 12, *Tree Conservation of the Fairfax County Public Facilities Manual*.	It is Fort Belvoir policy to adhere to the guidance of the Virginia Department of Conservation and Recreation's *Riparian Buffers Modification and Mitigation Guidance Manual* (2006) when replanting temporarily disturbed areas of floodplains and RPAs. Proposed ADP projects would adhere to this guidance in accordance with Fort Belvoir policies. *No changes were made to the Final EIS to address this comment.*
8			Sections 3.7 and 4.7, Water Resources	Stormwater	[D]eicing compounds applied to aircraft should be addressed to ensure that these actions do not negatively impact surface waters. DPWES Stormwater asks that the area development plan improvements provide stormwater quality and quantity controls above the minimum requirements to minimize impacts to Accotink Creek and, at a minimum, meet the water quantity detention requirements in Chapter 124 of the Fairfax County Code.	As stated in **Section 4.7** of the EIS, LID measures would be incorporated into applicable ADP projects to the maximum extent technically feasible to help maintain or restore stormwater runoff with regard to temperature, rate, volume, and duration of flow. Additionally, DAAF's Major Industrial Stormwater Permit and corresponding SWPPP would be updated as needed to incorporate and address the new or expanded facilities as well as account for changes associated with those facilities potentially affecting the quality and quantity of stormwater generated on the airfield. *No changes were made to the Final EIS to address this comment.*
9			Sections 3.7 and 4.7, Water Resources	Wetlands	DPWES Stormwater supports on-site stream and wetland mitigation within Fort Belvoir rather than payment of an in-lieu fee or purchase of mitigation bank credits outside of the Accotink Creek watershed. For example, on-site mitigation could include restoration of the mainstem of Accotink Creek adjacent to DAAF and upstream of US Route 1 to reconnect that stream to its floodplain, maximize floodplain storage, improve water quality by decreasing sediment and nutrient loads being transported downstream to the tidal portion of the creek and the Potomac River and improve wildlife habitat.	Appropriate mitigation measures for temporary and permanent wetland and stream impacts would be considered and implemented accordingly by the Army during the permitting process for each applicable ADP project. *No changes were made to the Final EIS to address this comment.*
10			Sections 3.7 and 4.7, Water Resources	Chesapeake Bay Preservation Act / Resource Protection Areas (RPAs)	DPWES Stormwater welcomes opportunities to coordinate and partner on Resource Protection Area (RPA) replanting and stream restoration opportunities that may help achieve mutual Chesapeake Bay TMDL goals and local Accotink Creek TMDL objectives.	Comment noted. The Army and Fort Belvoir will engage Fairfax County as well as other federal, state, and local agencies as opportunities for coordination and collaboration emerge. *No changes were made to the Final EIS to address this comment.*
11			Sections 3.6 and 4.6, Geology, Topography, and Soils; Sections 3.7 and 4.7, Water Resources	Stormwater, Erosion and Sediment Control	Fort Belvoir should consider incorporating erosion and sediment control measures, stormwater management measures, and water quality best management practices that are consistent with county requirements. Future analyses are encouraged to clearly establish that these requirements will be addressed. In addition, we encourage Fort Belvoir to establish stormwater management performance levels that will support policy, legislative and/or regulatory efforts that are under way (e.g., development of Total Maximum Daily Loads for local bodies of water as well as the Chesapeake Bay; new stormwater management regulations).	As stated in **Section 4.6** of the EIS, and as applicable, proposed ADP projects involving land disturbance would obtain coverage under the VPDES Permit for Discharges of Stormwater from Construction Activities (i.e., Construction General Permit; No. VAR10), which would require the preparation, approval, and implementation of a site-specific SWPPP prior to construction, including appropriate structural and non-structural erosion, sediment, and waste control best management practices (BMPs). Applicable land-disturbing projects would also prepare and adhere to an E&SC plan in accordance with 9VAC25-840-40 and stormwater management (SWM) plan in accordance with 9VAC25-870-55. *No changes were made to the Final EIS to address this comment.*

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Comment No.	Commenter Name	Commenter Agency / Organization / Title	Draft EIS Section No.	Topic	Comment	Government Response
12	Leanna H. O'Donnell	Fairfax County Department of Planning and Development, Planning Division – Director	Sections 3.8 and 4.8, Biological Resources	Vegetation, Natural Resources	The EIS should consider incorporating opportunities to preserve and maintain natural communities and ecosystem services at Fort Belvoir, including: o Guidelines and controls for land disturbing activities to include maintenance and training to prevent damage to natural resources. o A prohibition against the use of any non-native invasive plant species in plantings on post and a non-native invasive species inventory and control program.	As stated in **Section 4.7** of the EIS, temporarily disturbed areas associated with the proposed ADP projects would be replanted with native vegetation in accordance with established Fort Belvoir policies. As stated in **Section 4.8** of the EIS, construction contractors would adhere to Fort Belvoir's invasive species management plan to prevent or minimize the introduction and spread of non-native vegetation. The following text was added to **Sections ES.7, 4.1, 4.7.3.4, 4.7.4.4, 4.7.5.4, 4.8.3.5, 4.8.4.5,** and **4.8.5.5** of the Final EIS to address this comment: "Fort Belvoir DPW-ED would review each of the proposed ADP projects prior to implementation to identify environmentally sensitive areas that could potentially be impacted and work with the project proponent to identify alternatives to avoid impacts or measures to minimize or mitigate potential impacts."
13			Sections 3.8 and 4.8, Biological Resources	Vegetation	Fairfax County's Urban Forest Management Division (UFMD) will have specific comments based on the impacts of individual projects as they come forward. It should be noted that the Environmental section of the Policy Plan includes an Objective 10 on page 18 regarding the conservation and restoration of tree cover, which can be found here: https://www.fairfaxcounty.gov/planning-development/sites/planningdevelopment/files/assets/compplan/policy/environment.pdf. [The referenced Objective from the Environmental Section of the Policy Plan states the following: "Conserve and restore tree cover on developed and developing sites. Provide tree cover on sites where it is absent prior to development. Policy a: Protect or restore the maximum amount of tree cover on developed and developing sites consistent with planned land use and good silvicultural practices. Policy b: Require new tree plantings on developing sites which were not forested prior to development and on public rights of way. Policy c: Use open space/conservation easements as appropriate to preserve woodlands, monarch trees, and/or rare or otherwise significant stands of trees, as identified by the county."]	Comment noted. The Army will respond to comments from the Fairfax County UFMD as they are received. *No changes were made to the Final EIS to address this comment.* As stated in **Section 4.8** of the EIS, and as applicable, trees greater than 4 inches in diameter at breast height (dbh) removed by proposed ADP projects would be replaced in accordance with Fort Belvoir's *Tree Removal and Protection Policy #27*, which also requires a DPW-approved landscape plan for all construction projects. *No changes were made to the Final EIS to address this comment.*
14			Ch. 7, Federal Consistency	General, N/A	In consideration of the recommendations noted above, staff concurs that the proposed DAAF development plan would be consistent to the maximum extent practicable with the enforceable policies of the federally approved Virginia CZM Program, pursuant to the Coastal Zone Management Act of 1972 (16 USC 1456(c)), as amended, and in accordance with 15 CFR Part 930.	Comment noted. *No changes were made to the Final EIS to address this comment.*
15			Section 3.1.1, Resources Eliminated from Further Analysis	Utilities	For future analyses, the scope should address the capacities of sewer and water facilities as they relate to the levels of development that would be associated with each development alternative.	As stated in **Section 3.1.3** of the EIS, the Proposed Action would not include substantial changes in the number of personnel assigned to DAAF. The Proposed Action would generally replace outdated, inefficient facilities with new, more efficient facilities. Redundant or obsolete facilities would be demolished following the construction of new facilities. It is anticipated that the Proposed Action would result in no net change to the capacity of sewer and water systems serving DAAF, and could result in a beneficial effect on those systems. Therefore, utilities were dismissed from analysis in the EIS. *No changes were made to the Final EIS to address this comment.*

Table A-4: Local / Regional Agency Comments on the Draft EIS

Comment No.	Commenter Name	Commenter Agency / Organization / Title	Draft EIS Section No.	Topic	Comment	Government Response
16	Leanna H. O'Donnell	Fairfax County Department of Planning and Development, Planning Division – Director	General	Facility and landscape design	We commend Fort Belvoir on the quality of its current design elements and recommend that Fort Belvoir continue to incorporate high quality landscape, including native plant species and architectural design elements in its Master Plan.	Comment noted. *No changes were made to the Final EIS to address this comment.*
17			Sections 3.3 and 4.3, Historic and Cultural Resources	Off-post historic properties	Staff agrees with the assessment that the proposed modifications at DAAF will minimally impact the nearby county designated historic properties, due to existing landscaping and topography and the confirmation that the tallest building will not exceed 55 feet.	Comment noted. *No changes were made to the Final EIS to address this comment.*
18			Sections 3.3 and 4.3, Historic and Cultural Resources	Historic and Cultural Resources Coordination	[T]he proposed Area of Potential Effects (APE) intersects with two county designated historic overlay districts, Pohick Church and Mt. Air. Therefore, the Fairfax County Architectural Review Board (who oversees historic overlay districts) should be considered a separate consulting party from county planning heritage resources staff. Laura B. Arseneau, the Branch Chief of the Heritage Resources and Plan Development Branch can be reached at 703-324-1380 or Laura.arseneau@fairfaxcounty.gov.	An email notification announcing the availability of the Draft EIS for the 45-day public review and comment period was sent to Ms. Arseneau on July 24, 2020. Ms. Arseneau is included on the distribution list for correspondence regarding the DAAF ADP EIS and the ADP's potential effects on off-post historic properties and cultural resources in Fairfax County. *No changes were made to the Final EIS to address this comment.*

Table A-5: General Public and Private Individual Comments on the Draft EIS

Comment No.	Commenter Name	Commenter Agency / Organization	Draft EIS Section No.	Topic	Comment	Government Response
1	Helen Franssell	Private Individual; Mason Neck Resident	DEIS General / Section 3.5, Noise	Noise	My family is concerned about any expansion of the airfield, as it already contributes to noise pollution that is disruptive to local households. We frequently experience loud helicopter traffic that rattles our homes well into the evening when families/children are trying to sleep. Thank you for your consideration.	As stated in the EIS, the Army's Proposed Action primarily consists of construction, demolition, modernization, and infrastructure projects to provide DAAF's tenants with the facilities they require to fulfill their missions. There would be no substantial changes to the number or type of aircraft operating at DAAF, or the number of personnel assigned to DAAF. The acquisition of additional land outside DAAF's existing boundaries would not be required. The noise analysis presented in **Sections 3.5** and **4.5** of the EIS determined that the highest noise levels generated by DAAF aircraft operations (i.e., noise levels that are considered incompatible with residential development) are confined within the airfield's boundaries. The EIS analysis also determined that noise levels from DAAF aircraft occurring outside the airfield are substantially lower and are generally considered compatible with off-post land uses, including residential development. Fort Belvoir will continue to engage with off-post residents, neighborhood associations, and other stakeholders as necessary outside of this NEPA/ EIS process to address their concerns regarding noise generated by Garrison operations, including aircraft operating at DAAF. *No changes were made to the Final EIS to address this comment.*
2	David Howlett	Fort Belvoir Employee (Environmental Law Division)	Section 1.4, Purpose and Need	Purpose and Need	I'm calling in my capacity as a government employee at Fort Belvoir and I have read the Draft EIS. One of my issues before I read it was, do we really have to take away the Anderson picnic area land that needs to be converted to the airfield use? And I just wanted to say after reading the purpose and need section of the EIS, it's easily understandable why the buildings have to be taken away from the airfield. So, I think the EIS really did a very good job of explaining why the project needed to be done in addition to identifying the impacts from it, including what I call the Anderson picnic area, where units go and have a picnic. So, thank you for the opportunity to comment on that.	Comment noted. *No changes were made to the Final EIS to address this comment.*
3	Karen Walters	Private Individual	Sections 3.7 & 4.7, Water Resources	Floodplains, RPAs	1. This is inconsistent with County Policy and Ordinances. The Comprehensive Plan Policy Plan declares the County's policy to be to identify, protect, and restore an Environmental Quality Corridor system, and to include in it, lands which can achieve any of several purposes, including habitat quality, connectivity, and stream buffering. The FloodPlain Ordinance requires that uses in the floodplain meet the environmental goals and objectives of the adopted comprehensive plan for the property. Your plans are not consistent with the floodplain ordinance requirement that the proposal meet "the environmental goals and objectives of the adopted comprehensive plan for the subject property." (2-9.05-7-C) 2. The property is in an RPA. Building on this property requires an exemption or exception to the Chesapeake Bay Preservation Ordinance. In their natural condition, RPAs protect water quality, filter pollutants, reduce the volume of stormwater runoff, prevent erosion and perform important biological and ecological functions.	As stated in the EIS, Fort Belvoir recognizes Chesapeake Bay RPAs on the installation and has established extensive Special Natural Areas to protect and provide wildlife habitat. However, as a federal military installation, Fort Belvoir is not bound by local ordinances and must occasionally site facilities within sensitive natural areas to support Army and tenant mission requirements, such as some of the proposed ADP projects detailed in the EIS. On the whole, it is Fort Belvoir's policy to concentrate development in previously disturbed and developed areas of the installation, rather than to site new facilities in relatively undisturbed areas. It is also noted that although some of the proposed ADP projects would be implemented in areas identified as RPAs on DAAF, many of these areas do not fully function as a buffer as intended by the Chesapeake Bay regulations due to the presence of existing development or a lack of substantial vegetative cover. As detailed in the EIS, the proposed ADP projects are the outcome of an extensive planning process that considered multiple factors and constraints, including the presence of sensitive natural areas on DAAF. The proposed ADP projects analyzed in the EIS are those that were identified as meeting the Proposed Action's purpose and need; other alternatives that were initially considered would fail to adequately support DAAF tenant requirements and therefore, would not meet the purpose and need. As project planning and design continues, the Army will continue to refine the design of the proposed ADP projects to prevent or minimize impacts on sensitive natural areas to the extent feasible, and will adhere to applicable regulatory and permitting requirements to further minimize impacts as the projects are implemented. The Army has extensively detailed its rationale for siting the projects and their potential impacts in the EIS, FONPA, and associated documentation in accordance with NEPA, EOs 11988 and 11990, and other applicable regulatory requirements. *No changes were made to the Final EIS to address these comments.*

Table A-5: General Public and Private Individual Comments on the Draft EIS

Comment No.	Commenter Name	Commenter Agency / Organization	Draft EIS Section No.	Topic	Comment	Government Response
4	Karen Walters	Private Individual	Sections 3.7 & 4.7, Water Resources	Floodplains, RPAs	3. This plan is reckless and does not take into account the potential loss of property and life for Fairfax County residents who will be impacted by your proposal. Fairfax County Zoning Ordinance (Article 2, Part 9) regulates uses in floodplains "to provide for safety from flood and other dangers; to protect against loss of life, health, or property from flood or other dangers; and to preserve and protect floodplains in as natural a state as possible for the preservation of wildlife habitats, for the maintenance of the natural integrity and function of the streams, for the protection of water quality, and for the promotion of a zone for groundwater recharge." As a property owner who lives by the water, within 50' of the floodplain, you are directly impacting my property, and increasing the likelihood of flooding issues for our neighborhood due to your destruction of these areas. Your changes increase risk. Risk to property and risk to life. I find these two incompatible with DoD's usual risk assessments where those two factors generally rank high in a risk assessment. These RPAs were implemented in order to protect the water quality of the bodies of water draining into the Chesapeake as well as the land, from the flooding and erosion that is a byproduct of development.	The EIS analysis determined that, not accounting for any proposed or yet to be determined mitigation measures, risks to life or property under the Full and Partial Implementation Alternatives would be minimal and restricted to Fort Belvoir. Additionally, potential adverse impacts on life or property downstream of the airfield itself would largely accrue in the post's Southwest Area, which primarily consists of undeveloped land in a conservation status. Although Fort Belvoir recognizes RPAs on the installation and strives to divert development from RPAs to the extent feasible, many areas designated as RPAs do not fully function as a buffer due to the presence of existing development and/or the lack of substantial vegetative cover. As stated in the EIS, the proposed ADP projects would comply with applicable regulatory and permitting requirements to prevent or minimize adverse impacts on natural resources. *No changes were made to the Final EIS to address these comments.*
5			Section 4.7, Water Resources; Section 5.5, Assessment of Cumulative Impacts	RPAs, Cumulative Impacts	This proposal, combined with the other current sales/proposals in the local area (River Farm and the Stockton Pkwy build) indicate a serious problem in our area and a lack of consideration to the impact that each of these "exceptions" have on local residents. Individually they are destructive. Cumulatively, they are dangerous and show a disregard to the risk for residents in Fairfax County, and in particular to those in the Mt. Vernon area. In summary, your proposal is contrary to the intent of the RPA, and does not take into adequate consideration the impact and potential for loss to the residents of this community. I am opposed to this proposal.	The Proposed Action's cumulative impacts when considered with other past, present, and reasonably foreseeable future projects on and around Fort Belvoir are analyzed in **Chapter 5** of the EIS. The cumulative analysis determined that although the Proposed Action would contribute to adverse cumulative impacts on floodplains and RPAs, such impacts would not be significant. *No changes were made to the Final EIS to address this comment.*
6	Tom Gerard	Private Individual	Section 4.7, Water Resources	RPAs	The loss of 23 acres of RPA is not acceptable impact. Mitigation has to be stronger than compliance with USACE granted permits. Aging buildings should be replaced within same footprint rather than destroying more land.	As stated in the EIS, potential RPA impacts from the proposed ADP projects would be planned, conducted, and mitigated as applicable in accordance with the requirements of Fort Belvoir's *Guide for Resource Protection Areas (RPAs) and Stream Buffers* (21 September 2016). Such requirements could include the preparation of a WQIA in accordance with 9 VAC 25-830-140 and approval by DPW Environmental Division, and on-site or off-site mitigation plantings at ratios specified in the guidance to replace vegetation removed from the RPA. Generally, impacts on RPAs and other resources would be prevented or minimized through adherence to applicable regulatory and permitting requirements as well as the implementation of the proposed projects over 30 years, which would ensure that impacts do not occur simultaneously. To the extent feasible, some existing DAAF facilities would be modernized (i.e., renovated) and some would be rebuilt on or near their current site to meet tenant requirements. However, as detailed in the EIS, the replacement of several DAAF facilities in their current locations is not possible due their location within airfield safety zones. Therefore, such facilities must be located outside those safety zones (i.e., further away from the runway) to ensure the safety of aircraft operations and pilots, passengers, and cargo. *No changes were made to the Final EIS to address this comment.*
7	Catherine Ledec	Private Individual	Section 4.7, Water Resources	Water Resources	I urge that this proposed plan be fully and completely rejected and projects be redesigned so as to not impact at all Resource Protection Areas, Wetlands, Streams, and the 100-year flood plain.	As discussed in the EIS and noted in previous responses above, the proposed ADP projects are the outcome of an extensive planning process that was conducted to identify solutions that would meet the mission requirements of DAAF tenants. The planning process considered multiple constraints at DAAF, including natural resources, and the sites of the proposed projects are those that would avoid or minimize impacts on natural

Table A-5: General Public and Private Individual Comments on the Draft EIS

Comment No.	Commenter Name	Commenter Agency / Organization	Draft EIS Section No.	Topic	Comment	Government Response
8			Section 4.7, Water Resources; Section 4.8, Biological Resources	Sensitive Natural Areas	The US Army deserves creative and innovative work and serves as a role model for private businesses to follow. This work is not a best practice example of protection and conservation of important environmentally sensitive areas.	and human-made constraints at DAAF while meeting mission requirements. Through this process, the Army determined that other alternatives initially considered would fail to meet those requirements. The design of the proposed projects would be further refined as project planning and design continues to prevent or minimize impacts to the extent feasible, and compliance with applicable regulatory and permitting requirements would further minimize impacts. As previously noted, it is generally Fort Belvoir's policy to direct development and redevelopment to previously disturbed areas on the installation, rather than developing less-disturbed areas, even if that means that some previously impacted natural areas will be further impacted. Many areas identified as RPAs on Fort Belvoir do not fully function as buffers as intended by Chesapeake Bay requirements due to the presence of existing development and/or a lack of substantial vegetative cover. *No changes were made to the Final EIS to address these comments.*
9			Section 4.7, Water Resources	RPAs	This project proposes the the permanent loss of approximately 23 acres of land currently designated as Resource Protection Areas (RPAs). RPA lands are part of the Chesapeake Bay watershed and are supposed to be preserved per State and local laws.	
10			Section 4.7, Water Resources	Water Resources	Over 30-years through the proposed plan it is expected that 3.6 acres of wetlands and 2,026 linear feet of streams will have significant adverse impacts and 7.5 acres to be developed in the 100-year floodplain. This is an unacceptably significant adverse environmental impact that is fully and completely avoidable with a project redesign. Site selection should include as a high priority, sites that will not impact RPA, wetlands nor streams.	
11	Catherine Ledec	Private Individual	Section 4.7, Water Resouces	Water Resources, Floodplains	7.5 acres to be developed in the 100-year floodplain. These projects should be redesigned to not occur within the RPA, 100 year floodplain and streams and wetlands. With climate change already impacting us and with recent significant flooding events in the immediate vicinity resulting in flooding we know that the impact of any proposed development in the flood plain, RPA, wetlands and streams WILL RESULT in flooding and property damage and it is highly likely that a public safety and very dangerous conditions will result putting people's lives and property at risk. Building in these environmentally sensitive areas plain should not occur. The reason these lands are identified as flood plain is so that they can be avoided and development occur elsewhere. Fort Belvoir has other lands that can be used for this purpose.	See response to **General Public and Private Individual Comment 4** above. *No changes were made to the Final EIS to address this comment.*
12			Section 4.7, Water Resources; Section 4.8, Biological Resources	RPAs, Stormwater, Vegetation	As a priority Resource Protection Areas, Streams and Wetlands should be 100% (completely) avoided. These lands should be preserved. The footprint of buildings and impervious surfaces should be reduced. This includes parking lots and areas to be covered with asphalt and concrete. Natural surfaces that allow for stormwater to be infiltrated directly where it falls should be used as a priority. All trees removed as a result of any proposed projects should be replaced with native species at twice the diameter at breast height of trees removed.	Development of some areas on DAAF designated as wetlands, streams, floodplains, or RPAs to implement the proposed ADP projects is necessary to meet Army and DAAF tenant mission requirements. Alternatives that would avoid such areas would likely have adverse impacts on other resources and would fail to meet mission requirements. Buildings and associated infrastructure, such as parking lots, will be built in accordance with applicable requirements of the Fort Belvoir Installation Planning Standards and DoD UFC, which prescribe functional space requirements for military facilities. The use of permeable pavement, landscaping, and other measures to minimize adverse impacts would be incorporated into the proposed projects as applicable in accordance with those requirements. Trees removed by the proposed projects would be replaced in accordance with Fort Belvoir's *Tree Removal and Replacement Policy #27* and *Guide for Resource Protection Areas (RPAs) and Stream Buffers* (21 September 2016), as applicable. *No changes were made to the Final EIS to address this comment.*
13			Section 4.7, Water Resources	Water Resources	If RPAs, streams and wetlands are impacted by projects mitigation (through the expansion of conservation areas on Fort Belvoir property) should be provided at twice the rate of the loss and with better or like-for-like lands.	The proposed projects would adhere to applicable regulatory and permitting requirements, including established Fort Belvoir replanting requirements, to avoid or minimize potential impacts on natural resources at DAAF. *No changes were made to the Final EIS to address this comment.*

Table A-5: General Public and Private Individual Comments on the Draft EIS

Comment No.	Commenter Name	Commenter Agency / Organization	Draft EIS Section No.	Topic	Comment	Government Response
14	Catherine Ledec	Private Individual	Section 4.7, Water Resources	Water Resources	The US Army and its contracted staff must work creatively and innovatively to avoid all adverse impacts to Resource Protection Areas, 100-year flood plains, wetlands, streams and creeks. The US Army deserves a suite of projects that respect, protect and conserve our environmental resources rather than destroys them. As a federal government project private industry looks up to you for best practice examples of your work. This proposal is not a best practice and should be fully rejected.	Comment noted. *No changes were made to the Final EIS to address this comment.*
15	Elizabeth (Betsy) Martin	Private Individual	Section 2.2.2, EIS Alternatives	Alternatives	On this very constrained and very environmentally sensitive and habitat-rich site….the Partial Implementation Alternative seems preferable.	Comment noted. *No changes were made to the Final EIS to address this comment.*
16			Section 2.2, Alternatives Development and Evaluation Process	Alternatives	[T]he Full Implementation Alternative adds eight parking lots to DAAF. Could it be possible to consolidate and reduce some of this proposed surface parking, perhaps even locate some of it offsite, and run shuttle buses to serve non-emergency employees, in order to reduce impervious surface and impacts on wetlands and RPA? Or, put parking on top of the new buildings, or underneath new airfield surfaces? I did not find a discussion of what options the Army considered to pull new development out of sensitive areas as much as possible, or why the option of developing more in the northeast, non-RPA portion of the site was unfeasible.	The proposed parking lots shown on EIS figures for the Full and Partial Implementation Alternatives reflect the space needed to satisfy parking requirements for personnel assigned to DAAF while complying with parking ratios for federal agencies established by the National Capital Planning Commission (NCPC). Most of the proposed ADP projects are in a conceptual stage of planning, however, and the location, size, and type (e.g., structured, surface lot) of parking will continue to be refined as project planning and design continues. Alternatives that were initially considered by the Army but dismissed from further analysis in the EIS are discussed in **Section 2.2** of the EIS. *No changes were made to the Final EIS to address this comment.*
17			Section 4.10, Hazardous Materials and Waste	Hazardous Materials	[P]roject 13 (Aircraft Paint Shop) seems likely to be the source of hazardous substances, yet it appears to be sited practically on top of a tributary of Accotink Creek and a nearby large wetland; one would think such facilities should be located farther away, out of the floodplain, to reduce the risk of spills into the creek or flooding that would lead to contamination.	As discussed in the EIS, hazardous substances would continue to be used and managed at the new facilities in accordance with applicable regulatory requirements, including Chapter 18, Section 10 of AR 385-10, *The Army Safety Program*, Chapter 9, Section 1 of AR 200-1, and Fort Belvoir's *Hazardous Waste Management and Minimization Plan* (HWMMP). Adherence to these requirements would prevent or minimize the potential for accidental spills and their adverse effects on nearby resources. *No changes were made to the Final EIS to address this comment.*
18			Section 4.7, Water Resources; Appendix D, DAAF ADP Floodplain Impact Analysis	Floodplains	This area (in fact, much of DAAF) is identified by NOAA as having multiple flooding hazards. When it made its plans and calculated their impacts, did the Army take into account the increasing intensity of storm events due to climate change, and the increasing risk of flooding they pose?	A floodplain analysis was conducted for the ADP EIS for two primary reasons: 1) to update the boundary on DAAF of the 100-year floodplain associated with Accotink Creek, because the former boundary was considered outdated, and 2) to analyze the potential impacts on the updated floodplain that would potentially result from the proposed ADP projects. A detailed discussion of the floodplain analysis is provided in **Appendix D** of the EIS. *No changes were made to the Final EIS to address this comment.*
19			Section 4.7, Water Resources	RPAs, Water Quality	The FAQs state, "Fairfax County regulates proposed development activities within RPAs by requiring the preparation of a Water Quality Impact Assessment." It also requires submission of a request for an exception to the Chesapeake Bay Preservation Ordinance, and a public hearing before the Chesapeake Bay Exception Review Committee, which approves or denies requests for development activities within the seaward 50 feet of the RPA. Will the Army do a Water Quality Impact Assessment, and apply for an exception to Fairfax County's Chesapeake Bay Preservation Ordinance?	As stated in the EIS, potential RPA impacts from the proposed ADP projects would be planned, conducted, and mitigated as applicable in accordance with the requirements of Fort Belvoir's *Guide for Resource Protection Areas (RPAs) and Stream Buffers* (21 September 2016). Such requirements could include the preparation of a WQIA in accordance with 9 VAC 25-830-140 and approval by DPW Environmental Division, and on-site or off-site mitigation plantings at ratios specified in the guidance to replace vegetation removed from the RPA. Generally, impacts on RPAs and other resources would be prevented or minimized through adherence to applicable regulatory and permitting requirements as well as the implementation of the proposed projects over 30 years, which would ensure that impacts do not occur simultaneously. *No changes were made to the Final EIS to address this comment.*

Table A-5: General Public and Private Individual Comments on the Draft EIS

Comment No.	Commenter Name	Commenter Agency / Organization	Draft EIS Section No.	Topic	Comment	Government Response
20	Elizabeth (Betsy) Martin	Private Individual	Section 5.5, Assessment of Cumulative Impacts	Cumulative Impacts	The FAQs also say, "While the total impervious coverage in the Main Post portion of the Accotink Creek watershed would increase to approximately 12 percent [from 9 percent], it would represent only a 0.4 percent increase in impervious surfaces within the Accotink Creek watershed as a whole. Water quality on Main Post and DAAF would continue to be strongly influenced by existing development, impervious surfaces, and stormwater management practices in the majority of the Accotink Creek watershed upstream of the installation." So true! And yet this is the conundrum, is it not? All of the development is continuing, unabated, and each piece is justified as "only" representing a small increase in impervious surfaces within the watershed. Yet the cumulative impacts keep accumulating, and they are devastating to our local streams—death by a thousand cuts.	Comment noted. Cumulative impacts from other projects occurring outside Fort Belvoir are addressed in Chapter 5 of the EIS. Increases in impervious surface and stormwater runoff on Fort Belvoir will be managed in accordance with applicable regulatory requirements, as discussed in the EIS. *No changes were made to the Final EIS to address this comment.*
21			Section 4.7, Water Resources	Surface Waters	I hope the Army can find a way to do better by Accotink Creek. I support comments from the Friends of Accotink Creek.	As discussed in the EIS, Fort Belvoir will continue to prevent or minimize impacts on Accotink Creek to the extent possible in accordance with applicable regulatory and permit requirements. Comments on the Draft EIS that were received from the Friends of Accotink Creek are addressed in **Table A-6, *Non-Governmental Organization (NGO) and Other Organization Comments on the Draft EIS***. *No changes were made to the Final EIS to address this comment.*

Table A-6: Non-Governmental Organization (NGO) and Other Organization Comments on the Draft EIS

Comment No.	Commenter Name	Commenter Agency / Organization / Title	Draft EIS Section No.	Topic	Comment	Government Response
1	Ross M. Bradford	National Trust for Historic Preservation – Deputy General Counsel	N/A	Public Meeting Materials	The poster materials on your website say that the teleconference opportunity is on August 11; however, your email says it's August 24.	The meeting date was updated in the meeting materials posted online by July 27, 2020. *No changes were made to the Final EIS to address this comment.*
2			N/A	DEIS Public Meeting / Format	I expected this presentation to be a visual presentation online so that we could see things being explained since we're not in-person. My prior experience with these types of 106 consultations with the Fort in person would have been a normal presentation type format and not just an audio. So I would appreciate in the future when you…conduct these to have a bit more information provided visually online so that we can follow along.	The public teleconferences for the Draft EIS were conducted in lieu of in-person public meetings due to restrictions on public gatherings associated with the Covid-19 pandemic. The teleconferences were conducted in accordance with interim Army guidance for NEPA dated June 15, 2020. An audio-only telephone format was used for the meetings to maximize participation by the general public and agency representatives while minimizing the potential for technical difficulties for those who wished to attend the meetings. Electronic materials supporting the meetings, including fact sheets and posters that summarized the Draft EIS analysis and conclusions, were posted on Fort Belvoir's website for the duration of the 45-day Draft EIS public review period (July 24-September 8, 2020). The website URL was provided in the Draft EIS Notice of Availability published in the *Federal Register* on July 24, 2020, local newspaper announcements published on July 24 and July 30, 2020, and in email notifications sent to stakeholders announcing the Draft EIS review period and public meetings on July 24, August 19, and August 26, 2020. *No changes were made to the Final EIS to address this comment.*
3	Dale Rumberger	President, South County Federation	Section 2.2, Proposed Action	Proposed Action	I'm just confirming that what I heard was that there would be no expansion of flight operations greater than what they are currently, that no additional land would be needed outside of the current zone that the 350 acres that DAAF has operated on since 1951. I think that might be important to know the kind of aircraft that would be there. Since the ospreys have been coming over, there's quite a bit of noise that's pretty loud. So I think we probably would need to know a little bit more about the kind... Not specific operations, that's none of our business, but to know [inaudible 00:27:19] the general region here, the flight paths and the number of aircraft coming over that.	The Proposed Action analyzed in the EIS would not require the acquisition of additional land outside DAAF's existing boundaries, and does not include substantial changes to the number and types of aircraft operating at DAAF. The number and types of aircraft currently operating at DAAF, and their approximate operational flight patterns, are provided in **Appendix B** of the EIS. Noise at DAAF under current and proposed conditions is discussed in **Sections 3.5** and **4.5** of the EIS. *No changes were made to the Final EIS to address this comment.*
4			Sections 3.5 & 4.5, Noise; Section 4.3, Historic and Cultural Resources	Noise, Cultural Resources	I think it would be important that in the EIS you include the population expansion since 1951, when the base [airfield] was first founded. And I think also perhaps because there is noise as one of the areas that you are looking at, as well as the historical resources in the area, and since you're looking at noise as one of the categories, I think it would be important to look at noise patterns as well. And perhaps charts on a percentage of flights in certain directions...	The Proposed Action analyzed in the EIS would not substantially change the number of personnel assigned to DAAF or the number and type of aircraft operating at the airfield. Current aircraft operations associated with DAAF would continue as described in **Section 3.5** of the EIS. The noise study conducted for the EIS determined that airfield noise zones overlying nearby residential areas are compatible with residential development. The construction and operation of the proposed ADP projects would have no potential to measurably affect local or regional demographics or populations. Therefore, socioeconomics, including population trends in off-post areas near DAAF and Fort Belvoir, was dismissed from analysis in the EIS. The EIS determined that the Proposed Action's potential indirect effects (e.g., noise, visual quality) on off-post historic and cultural resources would be less-than-significant. *No changes were made to the Final EIS to address this comment.*
5			Section 2.2, Proposed Action; Section 4.5, Noise	Proposed Action, Noise	And that might be the time for us to see if it's possible to direct as many of those flights over the Fort and then on up the Potomac river and then breaking off their direction rather than over the vastly expanded neighborhood area that was not here in 1951, but it's most definitely here now and continuing to grow and expand. I just think that might be something worthy of discussions and some kind of charting of number and, maybe not kinds of flights, but numbers of flights, frequency of flights, et cetera. It was originally just rotary wing aircraft and now it has expanded in number and kind.	The Proposed Action analyzed in the EIS would not substantially change the number of personnel assigned to DAAF or the number and type of aircraft operating at the airfield. *No changes were made to the Final EIS to address this comment.*

Table A-6: Non-Governmental Organization (NGO) and Other Organization Comments on the Draft EIS

Comment No.	Commenter Name	Commenter Agency / Organization / Title	Draft EIS Section No.	Topic	Comment	Government Response
6	Dale Rumberger	President, South County Federation	Section 2.2, Proposed Action; Section 4.5, Noise	Proposed Action, Noise	At 10:11 this morning, there were two helicopters, one over maybe 500 feet, maybe. Those are the complaints, those are the things people hear about... Hearing that in the Environmental Impact Statement that there is no expansion of the runway, no other expansion or increase in flight operations plan, that you're merely replacing aged structures, which you obviously need to do, I think is a win for the base and could be very strong support component out of the community....We have to address the fact that whatever happens at DAAF will have some kind of impact on the noise in the area and that local communities would like to have it on record that we take all the mitigation factors we can there. If we're looking at 1500 linear feet of streams mitigation measures, we need to be looking at noise levels as well being mitigated over these expanding neighborhoods. Thank you.	The Proposed Action analyzed in the EIS would not substantially change the number of personnel assigned to DAAF or the number and type of aircraft operating at the airfield. The EIS proposes mitigation measures for resources analyzed in the EIS that would be significantly impacted by the Proposed Action. *No changes were made to the Final EIS to address this comment.*
7	Tom Blackburn	President, Audubon Society of Northern Virginia	Section 4.8, Biological Resources	Wildlife	To avoid or mitigate the loss of birdlife, ASNV recommends the following measures. • Include bird-friendly building design elements in DAAF development plans...Windows should not be of reflective or mirrored glass and should include fritting or frosted glass patterns on the outside layer of glass that follow the American Bird Conservancy guidelines for bird-safe window designs. Large, contiguous expanses of glass should be avoided, but if they are incorporated in any area, such as a building entrance, they also should incorporate patterns that deter collisions. If any windows are designed to open, they should include full screens, which deter collisions. Finally, breaking up any glass on the exterior of the building with brick or other non-window construction materials can reduce the potential risk for bird collisions.	Proposed facilities at DAAF would be constructed in accordance with applicable Unified Facilities Criteria (UFC) for Department of Defense (DoD) buildings, and the Fort Belvoir *Installation Planning Standards*. *No changes were made to the Final EIS to address these comments.*
8			Section 4.8, Biological Resources	Building Design, Wildlife	• Lighting design is also important both for the buildings and surrounding parking lots.... Because light pollution can affect adversely both plants and animals, lighting design for the facility should avoid blue-rich lights and follow the standards developed jointly by the International Dark Sky Association and the Illuminating Engineering Society of North America, particularly in preventing backlight (trespass), uplight and glare. Those issues are particularly important because of the location of buildings in or adjacent to the Lower Potomac River IBA.	
9			Section 4.8, Biological Resources	Biological Resources	• Because habitat loss from development is the greatest threat to native wildlife, landscape design should tie the facility more closely to its surrounding natural habitat. To benefit native wildlife, DAAF landscaping should use 100 percent native trees, shrubs, forbs (perennials) and ornamental grasses. Native plants which evolved along with native wildlife provide better nutrition for native wildlife than non-native plants.	As stated in **Section 4.8** of the EIS, areas of DAAF not built on or otherwise developed as part of the proposed ADP projects would be revegetated with native vegetation in accordance with applicable Fort Belvoir policies. *No changes were made to the Final EIS to address this comment.*
10			Section 4.6, Geology Topography, and Soils; Section 4.7, Water Resources	Runoff, Stormwater	[To prevent or minimize herbicide and pesticide runoff,]....facility design should improve storm water management by adding bio-retention areas and rain gardens along medians and around the edges of the asphalt parking lots with large native shade tree plantings throughout.	The incorporation of low impact development (LID) measures is recommended in the ADP in accordance with the Fort Belvoir Installation Planning Standards. As stated in **Section 4.6** of the EIS, the Alternatives would incorporate low impact development (LID) measures to maintain or restore the pre-development hydrology of the project sites, either voluntarily or as required to comply with Section 438 of the Energy Independence and Security Act (EISA). *No changes were made to the Final EIS to address this comment.*

Table A-6: Non-Governmental Organization (NGO) and Other Organization Comments on the Draft EIS

Comment No.	Commenter Name	Commenter Agency / Organization / Title	Draft EIS Section No.	Topic	Comment	Government Response
11	Tom Blackburn	President, Audubon Society of Northern Virginia	Section 6.2, Mitigation and Management Measures	Building Design, Mitigation Measures	• Reduction in the greenhouse gas footprint of the buildings also can mitigate their impact. A 2019 National Audubon Society report found that two-thirds of studied North American birds are at increasing risk of extinction from global temperature rise. The buildings could minimize their greenhouse gas footprint by installing solar panels. If the panel installation is not part of original construction, the building design should include a rooftop structure adequate to support a future installation.	Fort Belvoir continually evaluates alternative energy sources on an installation-wide and individual facility basis as a matter of strategic energy independence and national security. Proposed facilities at DAAF would be constructed in accordance with applicable Unified Facilities Criteria (UFC) for Department of Defense (DoD) buildings, and the Fort Belvoir Installation Planning Standards. *No changes were made to the Final EIS to address this comment.*
12			Sections 3.8 & 4.8, Biological Resources	Wildlife	• Finally, all demolition and construction activities should follow the August 2, 2018, Fort Belvoir Policy Memorandum #78, *Conservation of Migratory Birds*.	The Final EIS was revised as follows to address this comment: - **Sections 3.8.1** and **3.8.3.1**, third paragraph (both sections): "Projects potentially disturbing migratory birds or their habitat on the installation must adhere to the requirements of Fort Belvoir Policy Memorandum #78, *Conservation of Migratory Birds*." **Section 4.8.3.3**, fifth paragraph and **Section 4.8.4.3**, third paragraph: "Generally, projects with the potential to disturb migratory birds or their habitat would adhere to the requirements of Fort Belvoir Policy Memorandum #78, *Conservation of Migratory Birds*."
13	Greg Budnick	Director, Newington Organization	Sections 3.5 & 4.5, Noise; Appendix B, Aircraft Noise Modeling Report	Noise	We request that the EIS address the issue head-on by studying whether the relatively unrestricted training and practice operations are appropriate for an airfield with such a highly residential population directly adjacent to it and its traffic patterns and whether other military bases/locations exist to allow for pilots to complete their compulsory and regular training. Additionally and most importantly, sound studies such as an AICUZ should be performed for Davison with on- and off-base practice operations being studied specifically and the effects of such activities both on and off the base/airfield.	The subject of these comments is generally outside the scope of the EIS noise analysis because no new or different aircraft operations are proposed as part of the Proposed Action. The noise analysis presented in **Sections 3.5** and **4.5** of the EIS establishes the existing noise baseline for DAAF aircraft operations and evaluates potential impacts from the relocation of some engine run-up locations on the Airfield under the Proposed Action. Additional information supporting the noise analysis is presented in **Appendix B** of the EIS. Mr. Budnick's comments were provided to the Garrison and Airfield for further disposition outside of this NEPA/EIS process. *No changes were made to the EIS to address these comments.*
14					We recommend the EIS be amended to study the use of Davison as a training facility for other branches of the military and whether DAA is large enough to accommodate additional operations from other military bases on such a small airfield so proximate to residential neighborhoods. Such study should include assessment of other locations for such training to determine what level of training activities are mandatory for DAA, rather than nearby, yet more remote military facilities. Our community opposes the use of Davison as a training facility for the Air Force, Marines, Coast Guard and other non-resident branches of the military and government.	
15					We request that the Army amend the EIS with a formal study of this specific activity and whether the helipad itself or at least the “hovering” type of training can be relocated to a point further east or south as part of the implementation of the modernization initiative.	

Table A-6: Non-Governmental Organization (NGO) and Other Organization Comments on the Draft EIS

Comment No.	Commenter Name	Commenter Agency / Organization / Title	Draft EIS Section No.	Topic	Comment	Government Response
16	Greg Budnick	Director, Newington Organization	Sections 3.5 & 4.5, Noise; Appendix B, Aircraft Noise Modeling Report	Noise	Our data from 2014 through 2018 indicated that far too many military helicopter pilots chose to fly over our residential community when flying between DAA and points north, rather than following published directives on routes...The current NOTAM [Notice to Airmen] requires helicopter flights to arrive and depart from DAA in a manner which avoids direct overflight of our residential community by following Route 286 between DAA's helipad and I-95. We believe the EIS and Appendix B should speak to this environmental problem that is inherent to a helipad as it is logical to foresee given DAA's location relative to the District of Columbia and points north and the lack of published route maps south of the Beltway (see next section below) and easy to study.	See response to **Non-Governmental Organization (NGO) and Other Organization Comments 13-15**.
17	David Lincoln	Secondary Conservator, Friends of Accotink Creek	Section 4.6, Geology Topography, and Soils; Section 4.7, Water Resources; and Section 4.8, Biological Resources	Erosion and Sedimentation, Vegetation, Stormwater	[O]ur concerns with the DAAF Proposed Action are threefold: The impact on sedimentary load on the Accotink brought on by increased impervious surface and planned loss of riparian habitat; the loss of carbon sequestration that will result from destroying plant life and leaf count, on DAAF property; and the increase of pollution from winter storm treatment of DAAF's buildings runways, streets and sidewalks described in Projects 5-15 and 18-24.	As stated in the EIS, the proposed ADP projects would be implemented in accordance with applicable and regulatory permitting requirements, including coverage under the Construction General Permit (CGP) and adherence to erosion and sediment control plans, stormwater management plans, stormwater pollution prevention plans, Spill Prevention, Control, and Countermeasures (SPCC) plans, and similar measures. Adherence to these requirements during construction and incorporation of long-term stormwater management measures in accordance with Section 438 of the EISA would prevent or minimize discharges of pollutants and sediments to receiving water bodies and corresponding downstream erosion and scouring. The implementation of the proposed projects over a 30-year period would further minimize impacts, as not all impacts would occur simultaneously. As shown on **Figures 4.8-1 and 4.8-2** of the EIS, the proposed projects would have minimal potential to intersect with mature vegetation communities on DAAF. Tree clearing would be limited to those specimens required to implement a particular project. Extensive tracts of mature forest would remain on Fort Belvoir and in surrounding off-post areas during and following the implementation of the proposed ADP projects. Vegetation cleared during construction of the proposed projects would be replanted in accordance with established Fort Belvoir policies, as discussed in the EIS and previous comment responses in this section. Runoff from aircraft deicing and winter storm treatment of paved surfaces would continue to be managed through adherence to the DAAF SWPPP, which would be updated to account for the new facilities and paved surfaces in accordance with DAAF's Industrial Stormwater Major Permit issued by the VPDES program. *No changes were made to the EIS to address this comment.*
18			Section 4.7, Water Resources; Section 6.2, Mitigation and Management Measures	Wetlands	As the DAAF Proposed Action proceeds, the DAAF.....has an opportunity to set a high standard for environmental stewardship in our shared watershed as it contracts for projects that will retrofit and expand facilities. We note...the citation in the Draft EIS of the Army's EO 11990, *Protection of Wetlands*, that ". . . requires that federal agencies provide leadership and take actions to minimize or avoid the destruction, loss, or degradation of wetlands and to preserve and enhance the natural and beneficial values of wetlands"....We ask that the Army go above and beyond the minimum effort to meet its environmental obligations as dutifully addressed in the Draft EIS, and to not limit its application to the formally defined wetlands of DAAF, by realizing that the entire DAAF, apparently the only industrial area in the bottomlands of the lower Accotink, has little to no buffer space in which to mitigate damaging runoff.	Comment noted. *No changes were made to the EIS to address this comment.*

Table A-6: Non-Governmental Organization (NGO) and Other Organization Comments on the Draft EIS

Comment No.	Commenter Name	Commenter Agency / Organization / Title	Draft EIS Section No.	Topic	Comment	Government Response
19	David Lincoln	Secondary Conservator, Friends of Accotink Creek	Section 4.7, Water Resources	Water Resources	As the Army proceeds with the DAAF Proposed Action, the Friends of Accotink Creek will encourage all interested parties to join us in supporting positive initiatives, and we look forward to observing and participating as an advocate for the Accotink Creek watershed.	Comment noted. *No changes were made to the EIS to address this comment.*
20			Section 6.2, Mitigation and Management Measures	Mitigation and Management Measures	[W]e ask the Army to be more forthright and specific about BMPs that contractors will be required to use in projects of the Proposed Action. As described in Table ES-2: Summary of Impacts from the Proposed Action, full implementation will have these effects on "Water Resources: Disturb 3.6 acres of the officially designated wetlands and 2026 feet of the streams in DAAF; eliminate 23 acres of RPAs; and develop 7.5 acres of the officially designated flood plain. As noted, the ". . .Full Alternative would contribute significant adverse cumulative effects on wetlands and streams. . . " In response, the Army simply proposes in Section 6.2.1 that mitigation will be limited to three 'compensatory' alternatives: The restoration of wetlands and streams elsewhere on Fort Belvoir or the surrounding area; the payment of in-lieu fees to an approved restoration program; or the purchase of credits from an approved mitigation bank.	It is noted that, as stated in the EIS, the proposed ADP projects would be implemented over 30 years. The impacts quoted in the comment reflect those that would collectively occur over the 30-year implementation period. Distribution of the projects over 30 years would minimize their impacts and ensure they do not occur simultaneously. During that timeframe, it is also anticipated that Fort Belvoir would continue to replant and restore suitable areas of the installation as part of its ongoing natural resources management program, further offsetting natural resources impacts from the proposed ADP projects as well as other, unrelated projects that would likely occur. Specific BMPs are not discussed in the EIS 1) because such BMPs are not known at the current stage of project planning and 2) to allow Fort Belvoir and its contractors flexibility in selecting BMPs that are appropriate for the particular project and site conditions. As stated in the EIS, the proposed ADP projects would comply with applicable regulatory and permitting requirements, a number of which would require the incorporation of appropriate BMPs and/or other measures to prevent, minimize, and/or offset potential impacts. *No changes were made to the EIS to address this comment.*
21			Table 5.4-1, Past, Present, and Reasonably Foreseeabe Future Projects	Cumulative Impacts	Noting that Fort Belvoir's 52 other projects cited in Table 5.4-1 include many increases in impervious surfaces that will affect other watersheds, our impression is that the first compensatory alternative listed is a dead end.	To clarify the reviewer's comment, 22 of the 52 projects listed in **Table 5.4-1** are initiatives that are being proposed or implemented by Fairfax County, the Virginia Department of Transportation (VDOT), the Federal Highway Administration (FHWA), and/or private developers. These projects were included in the cumulative impacts analysis in accordance with NEPA requirements to analyze past, present, and future projects by federal as well as non-federal proponents. At least two of these projects (Nos. 26 and 27) consist of reforestation and BMP implementation, and others consist of infrastructure improvement projects (e.g., Nos. 30, 31, and 33) that would have minimal impacts on natural resources. *No changes were made to the EIS to address this comment.*
22			Section 4.7, Water Resources; Section 6.2, Mitigation and Management Measures	Water Resources, Mitigation	Rather than looking outside DAAF property for compensatory mitigation, we ask that the Army take advantage of this rare opportunity to make up for past construction in DAAF since the 1950's, doubtlessly with inadequate stormwater controls, by finding imaginative ways to provide the best of stormwater controls above and beyond the legally required minimums. For example, the BMPs for storm water management cited in the Accotink TMDL Volume II have corresponding efficiency measures from actual projects. Examples may include installing nearby green roofs, pervious parking lots, infiltration cisterns, rain gardens.	As stated in the EIS, natural resources on DAAF and Fort Belvoir, including stormwater, are managed in compliance with applicable regulatory and permitting requirements. Natural resources on DAAF will continue to be managed in accordance with applicable regulatory and permitting requirements as the proposed ADP projects are implemented. Appropriate measures will be incorporated into the proposed projects as applicable to prevent, minimize, or offset their impacts in accordance with those requirements and as prescribed in the DoD UFC, Fort Belvoir *Installation Planning Standards*, and other relevant guidance. *No changes were made to the EIS to address this comment.*
23			Section 6.2, Mitigation and Management Measures	Mitigation and Management Measures	[W]here mitigation of the impact on the Accotink within Fort Belvoir is not available, we ask the Army to cooperate with Fairfax County to find fundable shovel-ready projects that will improve Accotink Creek's health upstream of DAAF, rather than deferring to unrelated projects that theoretically will improve other streams.	The Army and Fort Belvoir will continue to coordinate and engage with Fairfax County appropriately throughout the implementation of the proposed ADP projects and other, unrelated projects occurring on the installation. *No changes were made to the EIS to address this comment.*

Table A-6: Non-Governmental Organization (NGO) and Other Organization Comments on the Draft EIS

Comment No.	Commenter Name	Commenter Agency / Organization / Title	Draft EIS Section No.	Topic	Comment	Government Response
24	David Lincoln	Secondary Conservator, Friends of Accotink Creek	Section 4.8, Biological Resources	Vegetation, Invasive Species	In some areas of the Draft EIS, wording is vague as to whether or not native species will be used for replanting disturbed areas of the Accotink watershed. We ask that the policy for the Proposed Action be clear that the Army requires that there will be no tolerance for invasive species in seed mix or plantings during and after construction, and that plantings will be with species native to this region of Virginia, allowing regrowth in harmony with surrounding habitats and native wildlife that will also help minimize upkeep and mowing expense.	As stated in **Section 3.8.2.2** of the EIS, Fort Belvoir actively manages invasive species on the installation and reviews landscaping plans for proposed projects to reduce the potential for invasive species introduction. The Final EIS was revised as follows to address this comment: - **Section 4.2.3.3**, second paragraph: "...would be demolished and replanted with native vegetation or otherwise returned to a permeable condition." - **Sections 4.6.3.2** and **4.6.4.2**, second paragraph (both sections) and **Section 4.6.4.2**, first paragraph : "...safety, native vegetation would also be re-established..." - **Section 4.7.3.4**, ***Chesapeake Bay Resource Protection Areas***, fourth paragraph: "As practicable, native vegetation would be planted..." - **Section 4.7.4.4**, ***Chesapeake Bay Resource Protection Areas***, third paragraph: "To the extent possible, native vegetation would be planted..." - Section **4.7.5.1**, second paragraph: "...would be re-planted with native vegetation or otherwise maintained..." - Section **4.8.3.1**, fourth paragraph: "...the re-planting with native vegetation of areas of project sites not built on..." Also see response to **Non-Governmental Organization (NGO) and Other Organization Comment 20.**
25			Section 4.8, Biological Resources	Vegetation	[W]e request that the Army employ the principle that leaf area is a better measure for the net carbon dioxide removal than just tree cover. Leaf area is also a better measure for water uptake and cooling effects in the immediate environment, and it allows the Army the flexibility of going with green walls and roofs which may be more palatable than efforts to replant the surface with multiple canopies in order to offset the increased impervious surface.	Comment noted. *No changes were made to the EIS to address this comment.*
26			Section 4.7, Water Resources	Water Resources	[W]e request that DAAF leadership consider and even surpass the recommendations that will result from the Accotink TMDL Volume III, Chlorides, in order to minimize impairment despite the increased area of paved surfaces that will need treatment in winter storms.	As previously noted, the proposed ADP projects would be implemented in accordance with applicable regulatory and permitting requirements to prevent or minimize impacts on natural resources. DAAF's VPDES Industrial Stormwater Major Permit will be modified as necessary to account for the new facilities and increases in impervious surface resulting from the Proposed Action. *No changes were made to the EIS to address this comment.*
27			Section 6.2, Mitigation and Management Measures	Mitigation and Management Measures	We also recommend benchmarking VDOT and local jurisdictions for cost - effective BMPs for salt management through monitoring and minimization based on conditions.	Comment noted. *No changes were made to the EIS to address this comment.*
28			Section 4.6, Geology, Topography, and Soils	Erosion, Stormwater	We look forward to the Army's success in preventing [excessive sediment] runoff during the DAAF modernization. Similarly, we have noted the extreme erosion of the Accotink banks Near Fort Belvoir's Anderson Park (to be partially paved over by Project 6), as recorded in Figure 2), and we hope the DAAF modernization will actually reduce such erosion with aggressive application of BMPs for storm water management.	Comment noted. *No changes were made to the EIS to address this comment.*
Other Organization Comment						
29	Fred Crawford	Pohick Episcopal Church	Meeting Materials	Historic and Cultural Resources	National Historic Preservation Act fact sheet on page 2 gives incorrect dates for construction of Pohick Church. The construction was started in 1769 and not completed until early 1774. The original undertaker (Project Manager), Daniel French died in 1771. He was replaced by George Mason, who completed the project in February, 1774.	The dates of construction for Pohick Church were corrected on the Section 106 fact sheet per the comment. The corrected fact sheet was provided to Fort Belvoir on 8/17/2020 for posting to its website. *No changes were made to the EIS to address this comment.*

Table A-7: Comments on the Draft FONPA[1]

Comment No.	Commenter Name	Commenter Agency / Organization	Draft EIS Section No.	Topic	Comment	Government Response
1	Barbara Rudnick	USEPA, NEPA Program Coordinator Office of Communities, Tribes & Environmental Assessment	Appendix F	FONPA	In the draft Finding of No Practicable Alternative, it is stated that "critical elements of the proposed buildings would be raised above the level of the 100-year floodplain and carefully selected fill soils would be placed and compacted to situate buildings above base flood elevation." We recommend it be clarified if the 100-year floodplain is being used for the base flood elevation, and if not determined, when more detailed engineering and design studies would be prepared.	The specific flood mitigation measures for applicable ADP projects is not yet known at the current stage of planning. However, as stated in the EIS, vulnerabilities of the proposed ADP projects to flooding would be mitigated through a variety of current and evolving measures that would be incorporated into each project as planning and design continues. The 100-year floodplain on DAAF was modeled to provide a baseline for the EIS impact analysis. Best available information, including the modeled 100-year floodplain as well as other data, will be incorporated as project planning continues to design and engineer proposed facilities potentially affecting the floodplain and applicable measures to prevent or minimize floodplain impacts. *No changes were made to the EIS or FONPA to address this comment.*
2				FONPA	Appendix F, the Draft Finding of No Practicable Alternative, describes several potential BMPs to minimize impacts on floodplain wetlands, including use of retaining walls, subsurface infiltration beds, vegetated retention, permeable pavement for parking lots, use of existing paved areas for construction access and staging and others. While some of these may be discussed throughout the DEIS, we recommend that these likely or potential mitigative measures be incorporated in the Mitigation section of the FEIS.	Applicable mitigation and minimization measures that the Army will commit to adopting or implementing for resources that would potentially be impacted by the proposed ADP projects will be memorialized in the ROD that will be issued for the Proposed Action following release of the Final EIS. *No changes were made to the EIS or FONPA to address this comment.*

Note:

1. Also see **Federal Agency Comments 27** and **45** in **Table A-2**.

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Federal Agency Comments

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

September 8, 2020

Mr. Felix Mariani
US Army Fort Belvoir Directorate of Public Works
Environmental Division, Chief
9430 Jackson Loop, Building 1442, Rm #230
Fort Belvoir, VA 22060-5116

Re: Davison Army Airfield Area Development Plan Draft Environmental Impact Statement, U.S. Army Garrison Fort Belvoir, Virginia, CEQ # 20200146

Dear Mr. Mariani:

In accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act and the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR 1500-1508), the U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS or Study) for the Implementation of an Area Development Plan (ADP) by the U.S. Army for Davison Army Airfield (DAAF) at U.S. Army Garrison Fort Belvoir (Fort Belvoir) in Fairfax County, Virginia. The proposed ADP consists of multiple construction, infrastructure, and facility modernization projects that would provide DAAF and its tenant organizations with the required facilities and infrastructure to fully support their ongoing missions. The proposed ADP would be implemented over the next 30 years. Full or Partial Implementation of the ADP were reviewed as alternatives.

EPA appreciates consideration given to our scoping letter of May 6, 2018 sent in response to the Notice of Intent to prepare the EIS and is providing comments for your consideration on the Draft Study.

The DEIS clearly explains the purpose and need of the project, including the inadequacies and inefficiencies of the current buildings and space, including the age, amount and quality of space needed for DAAF's tenants. As detailed in the Study, a space requirement analysis was conducted for each tenant, including the Army Aviation Brigade, Night Vision and Electronic Sensors Directorate, District of Columbia Army National Guard, Civil Air Patrol and Fire and Emergency Services; it was determined that collectively they have less than 50 percent of the functional space prescribed by Department of Defense guidance.

The Full Implementation alternative would include 24 projects, including demolition, construction, modernization, and infrastructure improvement projects. The Partial Implementation alternative would complete 15 of the short- and mid-range projects. Significant adverse impacts are anticipated to wetlands and streams from either alternative. The Full Implementation Alternative proposed would temporarily and permanently disturb approximately 3.6 acres of nontidal wetlands and 2,026 linear feet of streams for construction and operation of multiple ADP projects. Additionally, approximately 7.5 acres of permanent impacts to the 100-year floodplain associated with Accotink Creek are anticipated; this includes construction of facilities in the floodplain that would store

petroleum, oil, and lubricants and other hazardous materials. While the site has substantial constraints, we recommend that the Army continue to pursue potential opportunities to avoid and minimize both direct and indirect impacts to wetlands, streams, and floodplains during development of plans and highlight such opportunities and commitments in the Final Environmental Impact Statement (FEIS). Given these impacts, we also recommend that the Army consider early engagement for Clean Water Act Section 404 permitting so that avoidance and minimization measures can be fully evaluated; such engagement could ultimately streamline the permit process. Detailed comments are provided in the enclosure for your consideration.

Along with the direct impacts to aquatic resources, the Proposed Action would increase impervious surface at DAAF by 36.3 acres and decrease Chesapeake Bay Resource Protection Areas (RPAs) by 23.3 acres; these impacts may affect both physical habitat and water quality. While the increase to the overall Accotink Creek watershed may not be large (a 0.4% increase), local impacts (a 45% increase) could potentially cause degradation of the stream, its tributaries or associated wetlands. We recommend early identification of minimization measures, potential best management practices, and appropriate monitoring strategies for these impacts. Again, we recommend continuing conversations with appropriate resource agencies to identify measures to prevent water quality degradation and minimize impacts to wildlife habitat early in the design process.

Thank you for the opportunity to review this project and for your consideration of our comments. We would be happy to discuss these comments at your convenience. Please feel free to contact me at 215-814-3322 or rudnick.barbara@epa.gov. The staff contact for this project is Carrie Traver; she can be reached at 215-814-2772 or traver.carrie@epa.gov.

Sincerely,

Barbara Rudnick
NEPA Program Coordinator
Office of Communities, Tribes & Environmental Assessment

Enclosure

Proposed Action and Alternatives

The DEIS states that the consolidated complex for the 12th AV BN had to be sited to the northwest of the runway due to lack of sufficient space to the southeast. While this is reasonable, it would be helpful if the rationale for the specific location and layout of associated facilities were further discussed, including how constraints such as the Primary and Transitional Surfaces impact potential facility configurations. For example, Project 6 includes an approximately 55,000-square-foot parking lot for privately owned vehicles in the floodplain on a site that is currently part of Anderson Park. Could this parking lot be constructed in another location that would reduce potential impacts? Could structured parking or other measures be considered to reduce the footprint of the parking facility in this location?

Water Resources

Surface Water, Groundwater, and Stormwater

Located in Northern Virginia, the Accotink Creek Watershed is highly urbanized, particularly upstream of DAAF. Research has shown that water quality and aquatic habitat are more likely to be degraded or impaired in watersheds that contain high amounts of impervious cover; typically, watersheds with greater than 10% impervious area are not able to support high-quality aquatic communities. A total increase of approximately 36.5 acres of impervious surface is proposed under the Full Implementation Alternative. This would represent a 0.4% increase in the overall Accotink Creek watershed (from the existing 27%) and a 9% increase from existing conditions in the Main Post portion of the watershed, bringing the percentage of impervious cover within the Main Post to approximately 12%. Section 3.7.4 also states that approximately 11% of the Accotink Creek watershed on Fort Belvoir consists of impervious surface. These increases would remain below the thresholds of significance defined for the project in Section 4.7.1. However, it is unclear how the significance thresholds values were selected; we recommend the FEIS include information detailing how these were determined.

- As noted, the estimated increase in impervious surface would potentially generate increased volumes of stormwater runoff, which could accelerate erosion of stream banks and channels. Such erosion could degrade habitat and water quality downstream, impacting aquatic fauna. While the Accotink Creek watershed is large and the majority of the watershed is upstream, we recommend consideration of impacts to the smaller streams located on and downstream of DAAF. An increase of impervious area of up to 45% on DAAF is anticipated under the Full Implementation Alternative. We recommend potential effects of the expected increases in impervious cover be further evaluated within the context of DAAF and the Main Post.
- The FEIS may benefit from a discussion of current or proposed physical, chemical or biological monitoring. Section 4.7.3.2 indicates that Fort Belvoir would continue to sample runoff discharged to Accotink Creek and would implement corrective actions as needed to ensure pollutant concentrations remain within permitted thresholds. We recommend that this discussion be expanded to indicate the type of pollutants monitored, location, and frequency of sampling.

As noted, potential adverse impacts on groundwater resources could also result from an increase in impervious area, which diminishes natural recharge from precipitation, infiltration, and runoff. Low impact development (LID) and stormwater management that includes infiltration are critical to prevent degradation of both surface water and groundwater. The DEIS indicates that project designs would incorporate LID measures where feasible. We appreciate that the Army is considering such measures and recommend that where practicable, specific commitments and/or a robust discussion of anticipated measures be included in the FEIS.

The DEIS states that LID measures would be incorporated into Projects 5, 6, and 9 to the maximum extent technically feasible and each of these would use an analysis of pre-development hydrology to establish a baseline condition and set design objectives for stormwater management. We recommend that it be clarified if pre-development reflects the current existing condition, if the existing stormwater infrastructure is currently adequate, and if additional enhancement should be considered to address stormwater management issues.

If design objectives cannot be met within the ADP project footprint, the DEIS indicates that LID measures would be considered for application in areas downstream of DAAF. We recommend any known opportunities or areas that may be investigated for such measures be identified.

Wetlands and Streams

Anticipated linear feet of stream impacts are listed in Table 4.7-6; however, the specific need or type of the proposed impacts (culvert, fill, temporary mats) etc. is unclear. We recommend a discussion of how the aquatic resource impacts for each project were determined or were estimated. Additionally, it would be helpful to indicate the specific type of resource impacted (e.g. palustrine forested wetlands.)

As part of the future Clean Water Act Section 404 (CWA 404, 404) permit process, we suggest the Project team consider requirements anticipated for permitting. Please consider the following comments from the EPA Region III Water Division, Wetlands Branch as the Project moves through the NEPA process to permitting:

Alternatives and Minimization

Consideration of alternatives is a key element for the CWA Section 404b(1)Guidelines. Although the DEIS indicates that efforts have been made to avoid and minimize impacts to aquatic resources, it is unclear whether the proposed impacts have been avoided and minimized to the maximum extent practicable, as required by the Guidelines. Please consider the following as CWA 404 permitting will require selection of the least environmentally damaging practicable alternative (LEDPA):

- A number of the projects are likely to have minimal impact on natural resources; however, several projects have substantial impacts. EPA recommends additional information be provided about the project sequence as proposed in the short-, mid-, and long-range phases and address whether impacts can be further minimized through alternative sequences. For example, is it possible to complete all upland projects first which may reduce aquatic impacts if other phases are no longer needed?
- To better understand if the proposed action represents the LEDPA, EPA recommends the alternatives analysis for CWA 404 include the evaluation of not only the area or length of potential impacts to waters of the United States (WOTUS) for each project, but also the necessary criteria to meet the project purpose such as siting requirements or safety restrictions, and the consideration of upland sites. While it may be too early in the design phase to include this information in the FEIS, we recommend that the alternatives analysis for impacts to WOTUS clarify avoidance on-site. Specific considerations include:
    - 3.6 acres of wetlands disturbance is anticipated from Full Implementation of the ADP. Once it is clear that aquatic resource impacts have been avoided to the maximum extent practicable, we recommend focusing on minimization measures.
    - We recommend avoidance of wetland and stream impacts from the proposed road and trail crossings via siting and design; such measures include relocating crossings, upgrading existing inadequate crossings, minimizing impacts on stream habitat and biota, and maintaining wetland hydrology and aquatic life passage.

Aquatic Resource Impacts

To fully assess the impacts of the proposed project, as well as the adequacy of a compensatory mitigation proposal for unavoidable impacts to aquatic resources, detailed information will be needed regarding the quality and functions of the aquatic resources in the proposed project area. EPA recommends a baseline functional assessment of the aquatic resources to be impacted be conducted and the results be provided to better inform the review of the proposal. Examples can include, but are not limited to, hydrogeomorphic assessment, habitat, water quality, vegetation cover, etc. If available, this information can be added to the NEPA analysis or developed for later CWA 404 permitting.

As indicated, the Accotink Creek Watershed is highly urbanized upstream of the project site. Additionally, there are water quality concerns related to polychlorinated biphenyls in fish tissue, elevated bacteria levels, and benthic community impacts. As noted, the benthic communities at Fort Belvoir are generally tolerant of impaired physical habitats and poor to fair water quality. Therefore, 404 review will also consider the secondary and cumulative effects of the project as proposed. For CWA 404 review, we recommend that a thorough evaluation be undertaken, including documentation supporting the conclusions reached. EPA also offers the following comments for consideration:

- As previously noted, to avoid or minimize potential secondary or cumulative effects of the proposed project to aquatic resources, EPA recommends opportunities to reduce impervious surface area by using pervious materials, LID, and other green infrastructure opportunities. We recommend the FEIS discuss what opportunities have been considered and will be incorporated into the final project plans.
- We recommend the FEIS describe in more detail how buffers will be incorporated within the project boundaries to protect the condition and functions of the remaining aquatic resources.
- The location of stormwater management facilities is unclear at this time. Please note that EPA discourages the use of WOTUS for the treatment of stormwater as it may result in degradation of those waters. We recommend an evaluation of feasible siting configurations for stormwater management facilities that avoid and minimize impacts to waters.
- Please identify the three stormwater outfalls to Accotink Creek and include them on a map in the FEIS.

Temporary Impacts

As shown in Table 4.7-6, 1,595 linear feet of stream and up to 2.5 acres of wetlands may be subject to temporary, construction-related effects. However, the need for such temporary impacts and whether such impacts can be fully restored warrants further discussion. Construction impacts may be long-term or permanent; for example, forested wetland impacts may take many years to recover and should be avoided if possible. Where temporary impacts are unavoidable, we recommend that the FEIS commit to use wetland construction best management practices (BMPs) to avoid impacts that may be long-term (e.g. compaction and rutting of soils) and development of detailed restoration plans.

Compensatory Mitigation for WOTUS:

Once it is determined that all appropriate and practicable steps to avoid and minimize adverse impacts to WOTUS have been taken, compensatory mitigation is then considered for 404. EPA recommends the FEIS include a statement or narrative that describes how the proposal will adequately compensate for unavoidable permanent and temporary impacts to waters. To ensure a functional replacement of aquatic resources in the impacted watershed, we recommend using a mitigation bank whose primary service area encompasses the project location. Although credit availability may change in the future, we also recommend identifying suitable banks that may have appropriate credit availability in the service areas.

Chesapeake Bay Resource Protection Areas (RPAs)
The project anticipates 48 acres of temporary and 23.3 acres of permanent impacts to RPAs. Permanent impacts would convert RPAs to facilities, pavement, or other impervious surface, resulting in a long-term adverse impact. Given their function to trap pollutants in runoff and protect water quality, we concur that projects should be designed to minimize encroachment on RPAs and vegetation replaced to the extent practicable. We recommend stating whether any opportunities have been identified at DAAF or Fort Belvoir to improve RPAs.

Floodplains
All or portions of seven of the proposed ADP projects would be implemented in the 1% annual chance (100-year) floodplain of Accotink Creek. The Proposed Action would permanently encroach on up to 7.5 acres of the floodplain and up to 31 acres of floodplains may be subject to temporary effects.

- The DEIS states that facilities to be built in the 100-year floodplain would be designed to prevent the "downstream displacement of floodwaters." We recommend that this statement be explained as it appears flood waters would be increased.
- While the DEIS concludes that potential adverse impacts on property or life downstream would be limited in scope to DAAF and areas of Fort Belvoir that are undeveloped and in a conservation status, we recommend that the impact of increased flooding on downstream natural communities be discussed; including forest, wetlands, and the Accotink Wetlands Conservation Site. We also recommend clarification on potential impacts to downstream waters, including tributaries and the Potomac River.
- We also recommend that the FEIS further discuss to what extent the proposed projects in the floodplain will be vulnerable to flooding, how the flooding risks were considered, and how this risk will be mitigated so as not to interfere with tenant operations. In the draft Finding of No Practicable Alternative, it is stated that "critical elements of the proposed buildings would be raised above the level of the 100-year floodplain and carefully selected fill soils would be placed and compacted to situate buildings above base flood elevation." We recommend it be clarified if the 100-year floodplain is being used for the base flood elevation, and if not determined, when more detailed engineering and design studies would be prepared.
- We recommend further discussion whether the 100-year flood is appropriate for facility design. We suggest consideration of project vulnerabilities to extreme weather patterns (i.e. hurricanes, increased flooding) and long-term maintenance needs. How are climate factors such as more frequent and larger storm events taken into account in the analysis to prevent impacts from flooding on mission readiness?

Biological Resources
Vegetation
We recommend that the FEIS more clearly indicate expected impacts to the plant communities and clarify the thresholds of significance.

- While short-range ADP projects would collectively result in the removal of less than one acre of vegetation, the clearing from mid-range and long-range ADP projects is not discussed at 4.8.4.1. We recommend that the acreage and type of impacts be further described in that section.
- Vegetation communities (e.g. Beech Mesic-Mixed Oak Forest, Loblolly Pine Forest, etc.) are briefly described and shown on figures; however, it would be helpful to discuss their potential area on DAAF, the extent of impacts (in percentage and acreage) to each community to assess potential effects.
- The threshold of significance for Plant Communities and Forest Resources would also benefit from further discussion. The stated standard was "the permanent loss of more than two percent of the native plant communities at Fort Belvoir." We recommend that this be clarified to address whether this reflects

the overall acreage of Fort Belvoir, what that acreage is, how the percentage was determined, and whether impacts to a specific community type may be more appropriate to determine loss of resource.

- Tables 6.3 1 and Table ES-2 state that long-term, less-than-significant adverse impacts on wildlife from loss of approximately 9 acres of vegetation and forested habitat are anticipated. It would be helpful to clarify the expected acreage of tree clearing overall and that in landscaped or maintained areas.
- Further, we recommend clarification of temporary impacts, including estimated area of impacted communities and whether replacement vegetation would reflect the impacted community or type.

Wildlife

The discussion of impacts to Aquatic Macroinvertebrates/Fish and for Wildlife does not appear to reflect the significance thresholds selected for these resources (generally, greater than 2% habitat loss). For clarity, we recommend discussing the impacts in relation to the thresholds selected.

Breeding Birds of Management Concern (BBMC) Buffers

Fort Belvoir has established buffers for the prothonotary warbler, wood thrush, grasshopper sparrow, and prairie warbler. The ADP projects would permanently impact approximately 21.4 acres of the BBMC buffer for these species under the Full Implementation Alternative. This is an estimated 0.6% of BBMC buffer on the Main Post for all species and would be below the 2% threshold of significance defined in Section 4.8.1. However, impacts are more substantial to the grasshopper sparrow. 94% the of Main Post BBMC Buffer for this species is present on DAAF, and grassland habitat on and adjacent to DAAF is the only place within the county where the grasshopper sparrow has been documented breeding. Permanent impacts to buffers for that species would be 16.4% on the Main Post and 17.5% on DAAF. We recommend further discussion and mitigative measures specific to the impacts on the grasshopper sparrow.

It is stated that although BBMC habitat would be permanently removed by the projects, other areas of suitable habitat for those species would remain elsewhere on DAAF and the installation. Are these areas permanently protected? Are there areas onsite that have been identified where replacement BBMC buffers can be provided on DAAF or Fort Belvoir as discussed?

Rare Ecological Communities

3.8.4.2 indicates the Virginia Department of Conservation and Recreation (VDCR) identified Coastal Plain/Piedmont Acidic Seepage Swamps at DAAF; this is considered a very rare resource type. The DEIS states that a survey of the southwest portion of DAAF was conducted in 2017 to document the presence of a Coastal Piedmont Acid Seepage Swamp and this was included in Appendix C, but this was not found in the appendix referenced. We recommend that the FEIS discuss the location or occurrence and whether impacts may occur.

4.8.3.4 indicates that Projects 5 and 6 would occur in proximity to Accotink Creek, which has the potential to provide suitable habitat for the wood turtle. Species surveys would be conducted in the vicinity of those projects prior to their implementation “if determined necessary during continued project planning and design.” We recommend indicating who would make this determination and at what point in the process.

Invasive Species

As acknowledged, indirect adverse effects on plant communities could potentially occur through the introduction or spread of invasive species. The DEIS states that construction contractors would adhere to the requirements of Fort Belvoir’s invasive species management program to prevent the introduction of invasive species to the extent possible. Please expand this discussion to briefly describe how the invasive species program is managed and the how the work of contractors is reviewed or overseen by Fort Belvoir.

Geology and Soils
Project 8 would remove an earthen knoll as it violates the airfield's Transitional Surface. As described, approximately 337,000 cubic yards of soil would be excavated and removed. We recommend expanding the discussion to address: where this material would be taken; is it expected to be contaminated; are there opportunities for beneficial reuse on or offsite; and how many truckloads of material would be expected? Section 4.6.3.3 indicates Project 8 would require clean fill soils from outside sources; we recommend stating why clean fill soils are necessary.

Hazardous Materials
We recommend that further detail regarding the potential opportunities that may exist to improve, consolidate, or upgrade hazardous material storage areas with the modernization of the facilities, including Projects 2, 3, 4, and 6 be considered in the FEIS.

A 500-gallon waste petroleum, oil, and lubricant (POL) storage tank would be installed and operated as part of Project 6, and a number of the projects may include one or more ASTs or underground storage tanks for POL. We recommend additional discussion of potential impacts to water resources from leaks and/or flooding of tanks that are located in or adjacent to the floodplain. Also, Sections 4.10.3.4 and 4.10.4.4 state that portable aboveground storage tanks (ASTs) may be used during the implementation of ADP projects for on-site refueling of construction vehicles and equipment. We recommend clarifying if any applicable requirements or policies would require storing ASTs outside of potential flood areas or prohibit storage adjacent to waters.

Mitigation
Appendix F, the Draft Finding of No Practicable Alternative, describes several potential BMPs to minimize impacts on floodplain wetlands, including use of retaining walls, subsurface infiltration beds, vegetated retention, permeable pavement for parking lots, use of existing paved areas for construction access and staging and others. While some of these may be discussed throughout the DEIS, we recommend that these likely or potential mitigative measures be incorporated in the Mitigation section of the FEIS.

- 6.2.3 states that project-specific mitigation measures would be identified at a later date, as determined by more detailed design data. However, as the FEIS is a planning tool, we suggest identifying possible mitigation opportunities. For example, permanent loss of RPAs would require mitigation in the form of plantings on-site or buffer enhancement elsewhere on Fort Belvoir. As previously noted, we recommend describing whether areas have been identified for buffer enhancement.
- Mitigation of cumulative impacts through "out-of-kind" mitigation was briefly discussed, such as adding acreage to the protected Forest and Wildlife Corridors. Are there opportunities for protecting additional areas for mitigation?

Resources Eliminated from Further Analysis
Environmental Justice (EJ) and Traffic and Transportation were dismissed from detailed analysis. To support the finding of no substantive impacts, we recommend that the FEIS include a figure to show the location of potential EJ communities in relation to the Proposed Action. For Traffic and Transportation, we recommend that the FEIS discuss the likely increase and traffic routes for construction vehicles and how much traffic is expected to be increased, including anticipated numbers of trucks for projects that requiring trucking of fill soils to or from the site (e.g. Projects 5, 6, and 8).

Historic and Cultural Resources
Section 3.3.6 states that "most areas on Fort Belvoir have been subject to some level of survey and investigation." We suggest that the extent of such surveys for archaeological resources in the areas expected to be disturbed be clarified in the FEIS and whether additional surveys may be performed.

IN REPLY REFER TO:
NCPC File No. MP020

September 8, 2020

Fort Belvoir Directorate of Public Works
Environmental Division (DPW-ED)
9430 Jackson Loop, Suite 200
Fort Belvoir, Virginia 22060-5116

RE: DAAF ADP EIS

To Whom it May Concern:

Thank you for the opportunity to provide comments as part of the federal environmental review process for the Davidson Army Airfield Area Development Plan under the National Environmental Policy Act (NEPA). As the central planning agency for the federal government in the National Capital Region (NCR), NCPC has advisory review authority over federal projects at Fort Belvoir under the National Capital Planning Act (40 USC § 8722 (b) (1)).[1] We note that NCPC reviewed the Fort Belvoir Real Property Master Plan, granting final plan approval at our meeting in January, 2017. The Fort Belvoir Master Plan and NCPC's Comprehensive Plan policies for the region will be the basis for the Commission's review of the Area Development Plan (ADP). The current 2018 pre-final draft ADP should be reviewed by the Commission as soon as possible to ensure that the ADP meets the requirements of the Comprehensive Plan and so that any changes requested by the Commission can be evaluated fully by the NEPA process.

Transportation

The Transportation Element of the Comprehensive Plan was recently updated to address current regional conditions and better adapt to transportation needs. One specific update was clarifying the parking ratio goal in the suburban areas, such as Fort Belvoir, to a ratio of 1:2. The prior goal was a range of 1:1.5-1:2. The installation's master plan sustainability goals and planned nearby transit, walking, and bicycle improvements, intended to support more sustainable, compact development at Fort Belvoir, and therefore, parking should be limited in the airfield planning district as much as possible. However, in recognition of the airfield's unique purpose and secure nature of the facility (with limited transit access), should employee parking need to exceed NCPC's 1:2 (50%) goal, parking elsewhere on the installation can be scaled back to help attain the overall NCPC goal. There is not sufficient information in the current DEIS and draft ADP to determine if the parking ratio will be attained so the ADP may need to be updated as part of the NCPC review.

[1] The Planning Act requires federal agencies to advise and consult with NCPC in the preparation of agency plans prior to preparation of construction plans.

Tree Preservation

The DEIS states that the site will comply with the existing Fort Belvoir Tree Removal and Protection Policy that provides for several mitigation options, including replacing the removed trees at a 2- to 1 ratio. The current *Federal Elements of the Comprehensive Plan* states that trees of 10-inch diameter or less will be replaced at a minimum of a one-to-one basis and that trees with a diameter greater than 10 inches will be replaced at a rate derived from a formula of the International Society of Arboriculture, or as established by the local jurisdiction's requirements. It is important to note as well, that we are currently updating the Tree Preservation Policy to better address federal campus and project needs. We anticipate this update will be effective in early 2021. The ADP and EIS should be updated accordingly.

NCPC Review / Coordination

Pursuant to Department of Defense (DOD) planning policies (Unified Facilities Criteria – Installation Master Planning), we recognize that installation master plans are supported by more detailed Area Development Plans and subsequent project-level site plans. As such, as a component of the current Fort Belvoir Master Plan, the airfield ADP should be submitted to NCPC for separate draft and final reviews. Please refer to our agency website for additional information regarding master plan submissions to NCPC at www.ncpc.gov/review/guidelines. In advance of future ADP submissions, we encourage consultation meetings with NCPC and County planning staff to ensure ADP compliance with local and regional federal policies as much as possible.

These comments have been prepared in accordance with NCPC's Environmental and Historic Preservation Policies and Procedures. NCPC appreciates the opportunity to provide these comments and looks forward to our continued involvement throughout the NEPA process. If you have any questions about these comments, please contact Jamie Herr at (202) 482-7208 or Jamie.herr@ncpc.gov or please consult the NCPC website for further information on our legislative authorities, Comprehensive Plan, or project submission/review process.

Sincerely,

Diane Sullivan
Diane Sullivan (Sep 8, 2020 11:41 EDT)

Diane Sullivan
Director, Urban Design and Plan Review Division

cc: Chris Landgraf, Fort Belvoir, Directorate of Public Works
Kenneth Bansah, Fort Belvoir, Directorate of Public Works
Heather Cisar, U.S. Army Corps of Engineers, Baltimore District – Planning Division

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Custom House, Room 244
200 Chestnut Street
Philadelphia, Pennsylvania 19106-2904

IN REPLY REFER TO:

September 4, 2020

9043.1
ER 20/0315

Fort Belvoir Directorate of Public Works
Environmental Division (DPW–ED)
RE: DAAF ADP EIS 9430
Jackson Loop, Suite 200
Fort Belvoir, Virginia 22060–5116

RE: Draft Environmental Impact Statement and Draft Finding of No Practicable Alternative for Implementation of Area Development Plan at Davison Army Airfield, Fort Belvoir, Virginia

Dear Sir or Madam:

The U.S. Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement by the U.S. Department of the Army for the Davison Army Airfield Area Development Plan at Fort Belvoir - Fairfax County, Virginia. The Department does not have comments at this time.

Thank you for the opportunity to comment.

Sincerely,

John V. Nelson
Acting Regional Environmental Officer

Carver, Craig

From: Ross Bradford [redacted]
Sent: Friday, July 24, 2020 10:18 AM
To: FortBelvoirNOA@usace.army.mil
Cc: Carver, Craig
Subject: [EXTERNAL] RE: Draft EIS - Davison Army Airfield, Fort Belvoir, VA - Notice of Availability and 45-day public comment period

The poster materials on your website say that the teleconference opportunity is on August 11; however, your email says it's August 24.



Ross M. Bradford | DEPUTY GENERAL COUNSEL
[redacted]

NATIONAL TRUST FOR HISTORIC PRESERVATION
The Watergate Office Building
2600 Virginia Avenue NW Suite 1100 Washington, DC 20037
www.SavingPlaces.org

From: Carver, Craig [redacted]
Sent: Friday, July 24, 2020 8:05 AM
To: Carver, Craig [redacted]
Subject: Draft EIS - Davison Army Airfield, Fort Belvoir, VA - Notice of Availability and 45-day public comment period

Dear Stakeholder,

On behalf of the US Army Corps of Engineers (USACE), Baltimore District, this message is to inform you that the Draft Environmental Impact Statement (EIS) for an Area Development Plan (ADP) at Davison Army Airfield (DAAF), US Army Garrison Fort Belvoir, Virginia is available for a 45-day day public review and comment period that begins on July 24, 2020 and ends on September 8, 2020. Notice is also being given for a Draft Finding of No Practical Alternative (FONPA)

State and Local Agency Comments

September 3, 2020

US Army Fort Belvoir Directorate of Public Works
Attn: DAAF Draft EIS
Environmental Division, Chief
9430 Jackson Loop, Building 1442, Rm #230
Fort Belvoir, Virginia 22060-5116
Via email: fortbelvoirnoi@usace.army.mil

RE: Draft Environmental Impact Statement and Federal Consistency Determination, Davison Army Airfield Area Development Plan, Department of the Army, Fort Belvoir, Fairfax County (DEQ 20-110F)

Chief, Environmental Division:

The Commonwealth of Virginia has completed its review of the above-referenced document. The Department of Environmental Quality is responsible for coordinating Virginia's review of federal environmental documents submitted under the National Environmental Policy Act (NEPA) 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. This is in response to the June 2020 Draft Environment Impact Statement (DEIS) (received July 24, 2020) for the above-referenced project. In addition, a Federal Consistency Determination for the proposed action is included in the DEIS (Section 7). The following agencies participated in the review of this proposal:

Department of Environmental Quality
Department of Wildlife Resources
Department of Conservation and Recreation
Department of Health
Marine Resources Commission
Department of Historic Resources
Department of Aviation

In addition, Fairfax County and the Northern Virginia Regional Commission were invited to comment on the proposal.

PROJECT DESCRIPTION

The U.S. Department of the Army (Army) proposes to implement the Area Development Plan (ADP) for Davison Army Airfield (DAAF) located at the US Army Garrison Fort Belvoir, Fairfax County, Virginia. DAAF currently hosts five main Department of Defense (DoD) tenants:

- Army Aviation Brigade (TAAB);
- Night Vision and Electronic Sensors Directorate (NVESD);
- District of Columbia Army National Guard (DCARNG);
- Civil Air Patrol (CAP); and
- Fire and Emergency Services (FES).

Approximately 50 helicopters and airplanes are permanently assigned to DAAF to support the missions of the tenants. These aircraft are used for training and testing operations as well as passenger transport for the Army and DoD.

The Proposed Action is to implement 24 construction, modernization, demolition, and infrastructure improvement projects identified in the DAAF ADP. All of the proposed projects would occur within Fort Belvoir's existing boundaries and most of them within DAAF's existing fence line. The proposed projects are organized into short-range (next ten years), mid-range (from 11 to 20 years from now), and long-range (from 21 to 30 years from now) timeframes.

The Full Implementation Alternative would implement all 24 projects identified in the DAAF ADP. As such, it would include the modernization of seven existing buildings and structures, construction of 13 buildings and structures, and demolition of up to 37 existing buildings and structures.

The Partial Implementation Alternative would implement a modified, reduced program of ADP projects at DAAF. This alternative would amount to implementing 15 of the projects, including all of the short-range and most of the mid-range projects, with adjustments to some of the projects relative to the Full Implementation Alternative. None of the long-range projects would be implemented. Under this Alternative, seven facilities would be modernized while five new facilities would be constructed. Up to 24 existing buildings and structures at DAAF would be demolished to remove facilities that would be redundant or unnecessary following the implementation of the proposed projects.

FEDERAL CONSISTENCY UNDER THE COASTAL ZONE MANAGEMENT ACT

Pursuant to the Coastal Zone Management Act of 1972 (CZMA), as amended, and the federal consistency regulations implementing the CZMA (15 CFR, Part 930, Subpart C, § 930.30 *et seq*.), 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 be implemented in a manner consistent, to the maximum extent practicable, with the Virginia Coastal Zone Management (CZM) Program. The Virginia CZM Program consists of a network of programs administered by several agencies. DEQ coordinates the review of federal agency consistency determinations with the state agencies that administer the enforceable and advisory policies of the Program.

FEDERAL CONSISTENCY PUBLIC PARTICIPATION

In accordance with Title 15, Code of Federal Regulations (CFR), § 930.2, the public was invited to participate in the review of the FCD submitted for the proposal. Public notice of this proposed action was published in OEIR's Program Newsletter and on the DEQ website from July 20, 2020 through August 28, 2020. No public comments were received in response to the notice.

FEDERAL CONSISTENCY CONDITIONAL CONCURRENCE

The DEIS includes a Federal Consistency Determination (FCD) (Section 7) that includes an analysis of the consistency of the Proposed Action on the enforceable policies of the Virginia CZM Program. Based on our review of the consistency certification and the comments submitted by agencies administering the enforceable policies of the Virginia CZM Program, DEQ conditionally concurs that the Proposed Action is consistent with the Virginia CZM Program.

The DAAF ADP describes in general terms the implementation of 24 construction, modernization, demolition, and infrastructure improvement projects at the facility over a 30-year period divided into three 10-year phases. No detailed site specific information or analysis is provided for the individual projects that make up the Proposed Action. Reviewer comments reflect the need for site specific information and coordination as project are implemented. For example, while the Virginia Marine Resources (VMRC) finds that it appears no permit will be required based on a desktop review of the information and mapping provided in the DEIS, VMRC notes that the submission of a Joint Permit Application with more detailed drawings and mapping, will determine the permitting requirements of federal, state, and local environmental agencies that participate in the JPA process. Similarly, the DEQ Office of Watersheds and Local Government Assistance Program finds that there is insufficient information in the DEIS to determine whether individual projects comply with the Chesapeake Bay Preservation Act and the *Regulations*. Compliance with the Bay Act and *Regulations* would be determined upon the submission of required information on individual projects as they are implemented.

The CZMA Federal Consistency Regulations (15 CFR, Subpart C, § 930.36 (d)) states that, "*In cases where federal decisions related to a proposed development project or other activity will be made in phases based upon developing information that was not available at the time of the original consistency determination, with each subsequent*

phase subject to Federal agency discretion to implement alternative decisions based upon such information (e.g., planning, siting, and design decisions), a consistency determination will be required for each major decision. In cases of phased decision-making, Federal agencies shall ensure that the development project or other activity continues to be consistent to the maximum extent practicable with the management program."

Therefore, DEQ's concurrence with the Proposed Action is conditioned upon the Army's submission of project-specific consistency determinations to DEQ for review and concurrence in accordance with 15 CFR, Part 930, Subpart C, § 930.30 *et seq*. The consistency determinations shall contain the necessary information and analysis demonstrating project consistency with the enforceable policies of the Virginia CZM Program. If this condition is not met, then all parties shall treat the DEQ's conditional concurrence as an objection (15 CFR, Subpart A, § 930.4 *et seq*.)

Other state approvals which may apply to project activities are not included in this concurrence. Therefore, the Army must ensure that project activities are implemented in accordance with all applicable federal, state, and local laws and regulations at described below in the Environmental Impacts and Mitigation section of this response.

ENVIRONMENTAL IMPACTS AND MITIGATION

1. Surface Waters and Wetlands. According to the DEIS (Table 6.3-1, Summary of Impacts from the Proposed Action, page 6-8), under the Full Implementation Alternative, significant adverse impacts would occur on wetlands and streams from unavoidable disturbance of approximately 3.6 acres of wetlands and 2,026 linear feet of streams during construction and operation of multiple ADP projects over the Alternative's approximately 30-year implementation period. Impacts would be confined to resources within DAAF's boundaries. Under the Partial Implementation Alternative, significant adverse impact on wetlands from unavoidable disturbance of approximately 1.4 acres of wetlands during construction and operation of multiple ADP projects would occur over the Alternative's approximately 20-year implementation period. Short- and long-term, less-than-significant adverse impacts on streams would occur from 517 linear feet of temporary and permanent disturbance. In addition, DAAF's Virginia Pollutant Discharge Elimination System Industrial Stormwater Major Permit (VA0092771) would be updated accordingly as the proposed projects become operational to account for changes in the quantity and quality of stormwater generated by the new facilities and changes to stormwater management practices necessitated by them (DEIS, page 6-3).

1(a) Agency Jurisdiction.

(i) Department of Environmental Quality

The State Water Control Board promulgates Virginia's water regulations covering a variety of permits to include the Virginia Pollutant Discharge Elimination System Permit

regulating point source discharges to surface waters, Virginia Pollution Abatement Permit regulating sewage sludge, storage and land application of biosolids, industrial wastes (sludge and wastewater), municipal wastewater, and animal wastes, the Surface and Groundwater Withdrawal Permit, and the Virginia Water Protection (VWP) Permit regulating impacts to streams, wetlands, and other surface waters. The VWP permit is a state permit which governs wetlands, surface water, and surface water withdrawals and 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 VWP Permit Program is under the Office of Wetlands and Stream Protection, within the DEQ Division of Water Permitting. In addition to central office staff that review and issue VWP permits for transportation and water withdrawal projects, the six DEQ regional offices perform permit application reviews and issue permits for the covered activities:

- Clean Water Act, §401;
- Section 404(b)(i) Guidelines Mitigation Memorandum of Agreement (2/90);
- State Water Control Law, Virginia Code section 62.1-44.15:20 *et seq*.; and
- State Water Control *Regulations*, 9 VAC 25-210-10.

(ii) Virginia Marine Resources Commission

The Virginia Marine Resources Commission (VMRC) regulates encroachments on tidal wetlands pursuant to Virginia Code §28.2-1200 through 1400.

1(b) Agency Findings.

(i) Virginia Water Protection Permit

The VWP Permit program at the DEQ Northern Regional Office (NRO) finds that VWP permits may be required as ADP projects are implemented for proposed impacts to jurisdiction surface waters and wetlands.

(ii) Virginia Pollutant Discharge Elimination System

The VPDES program at DEQ-NRO finds that construction projects may require coverage under General Permit VAG83 for Discharges from Petroleum Contaminated Sites, Groundwater Remediation, and Hydrostatic Tests, for any hydrostatic tests on new piping, or for any potential dewatering during construction if petroleum contamination is encountered. In addition, DEQ-NRO finds that the proposed DC Air National Guard (DCARNG) Aircraft Wash Rack may result in a discharge to surface waters. DEQ-NRO recommends that the wash rack be connected to the sanitary sewer system, otherwise any discharge to surface waters may require a VPDES permit.

(iii) Tidal Wetlands

VMRC finds that based on a desktop review of the information and mapping provided, it appears that no permit will be required for tidal wetlands under its jurisdiction.

1(c) Requirements.

(i) Virginia Water Protection Permit

The Army must coordinate with DEQ-NRO prior to the implementation of individual ADP projects. Coordination is initiated upon the submission of a Joint Permit Application (JPA) to VMRC which serves as the clearinghouse for review by DEQ, VMRC, local wetlands board and the U.S. Army Corps of Engineers (Corps). VWP Permit staff at DEQ-NRO will review the proposed projects in accordance with the VWP Permit program regulations and guidance.

(ii) Virginia Pollutant Discharge Elimination System

Projects must comply with the existing VPDES individual permit for the facility (VA0092771). If it is determined that a project will result in changes affecting coverage under the individual permit (e.g. adding or removing outfalls, adding or removing discharges), the Army must initiate consultation with DEQ-NRO.

1(d) Recommendations. In general, DEQ recommends that stream and wetland impacts be avoided to the maximum extent practicable. To minimize unavoidable impacts to wetlands and waterways, DEQ recommends the following practices:

- Operate machinery and construction vehicles outside of stream-beds and wetlands; use synthetic mats when in-stream work is unavoidable.
- Preserve the top 12 inches of trench material removed from wetlands for use as wetland seed and root-stock in the excavated area.
- Design erosion and sedimentation controls in accordance with the most current edition of the Virginia Erosion and Sediment Control Handbook. These controls should be in place prior to clearing and grading, and maintained in good working order to minimize impacts to State waters. The controls should remain in place until the area is stabilized.
- Place heavy equipment, located in temporarily impacted wetland areas, on mats, geotextile fabric, or use other suitable measures to minimize soil disturbance, to the maximum extent practicable.
- Restore all temporarily disturbed wetland areas to pre-construction conditions and plant or seed with appropriate wetlands vegetation in accordance with the cover type (emergent, scrub-shrub, or forested). The applicant should take all appropriate measures to promote revegetation of these areas. Stabilization and restoration efforts should occur immediately after the temporary disturbance of each wetland area instead of waiting until the entire project has been completed.

- Place all materials which are temporarily stockpiled in wetlands, designated for use for the immediate stabilization of wetlands, on mats, geotextile fabric in order to prevent entry in State waters. These materials should be managed in a manner that prevents leachates from entering state waters and must be entirely removed within thirty days following completion of that construction activity. The disturbed areas should be returned to their original contours, stabilized within thirty days following removal of the stockpile, and restored to the original vegetated state.
- Flag or clearly mark all non-impacted surface waters within the project or right-of-way limits that are within 50 feet of any clearing, grading, or filling activities for the life of the construction activity within that area. The project proponent should notify all contractors that these marked areas are surface waters where no activities are to occur.
- Employ measures to prevent spills of fuels or lubricants into state waters.

2. State Subaqueous Lands. According to the DEIS (Table 6.3-1, Summary of Impacts from the Proposed Action, page 6-8), under the Full Implementation Alternative, significant adverse impacts would occur on streams from unavoidable disturbance of approximately 2,026 linear feet of streams. Under the Partial Implementation Alternative, short- and long-term, less-than-significant adverse impacts on streams would occur from 517 linear feet of temporary and permanent disturbance.

2(a) Agency Jurisdiction. The Virginia Marine Resources Commission (VMRC) regulates encroachments in, on or over state-owned subaqueous beds as well as tidal wetlands pursuant to Virginia Code §28.2-1200 through 1400. For nontidal waterways, VMRC states that it has been the policy of the Habitat Management Division to exert jurisdiction only over the beds of perennial streams where the upstream drainage area is 5 square miles or greater. The beds of such waterways are considered public below the ordinary high water line.

2(b) Agency Findings. VMRC finds that based on a desktop review of the information and mapping provided, it appears that no permit will be required.

2(c) Requirement. The submission of a JPA to VMRC, with detailed drawings and mapping, is required to determine the permitting requirements of federal, state, and local environmental agencies involved in the JPA process. As details are developed, submit JPAs as necessary to VMRC which serves as the clearinghouse for permit reviews that fall under the jurisdiction of DEQ, VMRC, local wetlands boards, and the Corps.

3. Erosion and Sediment Control and Stormwater Management. According to the DEIS (page 6-2), each project will comply with the applicable requirements of the Virginia Stormwater Management Law, *Virginia Stormwater Management Regulations*, and Virginia Erosion and Sediment Control Law, *Regulations*, and *Certification Regulations*. In accordance with the Virginia Stormwater Program (9 VAC 25-870),

Stormwater Pollution Prevention Plans will be prepared and implemented for projects with activities disturbing land areas one acre or greater in size.

3(a) Agency Jurisdiction. The DEQ Office of Stormwater Management (OSWM) administers the following laws and regulations governing construction activities:

- Virginia Erosion and Sediment Control (ECS) Law (§ 62.1-44.15:51 *et seq*.) and Regulations (9 VAC 25-840);
- Virginia Stormwater Management Act (§ 62.1-44.15:24 *et seq*.);
- Virginia Stormwater Management Program (VSMP) regulation (9 VAC 25-870); and
- 2014 General Virginia Pollutant Discharge Elimination System (VPDES) Permit for Discharges of Stormwater from Construction Activities (9 VAC 25-880).

In addition, DEQ is responsible for the Virginia Stormwater Management Program (VSMP) 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 (9 VAC 25-890-40).

3(b) Requirements.

(i) Erosion and Sediment Control and Stormwater Management Plans

The Army and its authorized agents conducting regulated land-disturbing activities on private and public lands in the state must comply with *VESCL&R* and *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, borrow areas, soil stockpiles, and related land-disturbing activities that result in the total land disturbance of equal to or greater than 2,500 square feet in Chesapeake Bay Preservation Area would be regulated by *VESCL&R*. Accordingly, the Army must prepare and implement erosion and sediment control (ESC) plans as individual projects are implemented to ensure compliance with state law and regulations. The ESC plans must be submitted to DEQ-NRO for review for compliance.

Land-disturbing activities that result in the total land disturbance of equal to or greater than 2,500 square feet in a Chesapeake Bay Preservation Area would be regulated by *VSWML&R*. Accordingly, the Army must prepare and implement a Stormwater Management (SWM) plans as individual projects are implemented to ensure compliance with state law and regulations. The SWM plans must be submitted to DEQ-NRO 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 62.1-44.15 *et seq*.]

(ii) General VPDES Permit for Discharges of Stormwater from Construction Activities (VAR10)

The operator or owner of a construction project involving land-disturbing activities equal to or greater than one acre is required to register for coverage under the VAR10 permit and develop a project-specific stormwater pollution prevention plan. Construction activities requiring registration also include 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 collectively disturb equal to or greater than one acre. The SWPPP must be prepared prior to submission of the registration statement for coverage under the Construction General Permit and the SWPPP must address water quality and quantity in accordance with the *VSMP Permit Regulations.* [Reference: Virginia Stormwater Management *Act* 62.1-§44.15 *et seq*.] *VSMP Permit Regulations* 9 VAC 25-870-10 *et seq*.].

(iii) Municipal Separate Storm Sewer System (MS4)

Projects must be constructed and operated in accordance with Fort Belvoir's MS4 permit (VAR040093).

3(c) Recommendations. DEQ-NRO recommends the use of permeable paving for parking areas and walkways where appropriate, and denuded areas should be promptly revegetated following construction work.

4. Chesapeake Bay Preservation Areas. According to the DEIS (Table 6.3-1, Summary of Impacts from the Proposed Action, page 6-8), under the Full Implementation Alternative, long-term, direct, less-than-significant adverse impacts would occur on Resource Protection Areas (RPAs) from permanent loss of approximately 23 acres of RPA. Under the Partial Implementation Alternative, projects would permanently impact an estimated 15 acres of RPA. The DEIS (pages 6-2 and 6-3) states that projects with potential to permanently impact RPAs on DAAF would be planned, conducted, and mitigated as applicable in accordance with the requirements of *Fort Belvoir's Guide for Resource Protection Areas and Stream Buffers* dated 21 September 2016 (Fort Belvoir 2016). Such requirements could include the preparation of a Water Quality Impact Assessment in accordance with 9 VAC 25-830-140 and approval by the Belvoir Directorate of Public Works (DPW) Environmental Division, and on-site or off-site mitigation plantings at ratios specified in the guidance to replace vegetation removed from the RPA.

4(a) Agency Jurisdiction. The DEQ Office of Watersheds and Local Government Assistance Programs (OWLGAP) administers the Chesapeake Bay Preservation Act

(Virginia Code §62.1-44.15:67 *et seq*.) and *Chesapeake Bay Preservation Area Designation and Management Regulations* (9 VAC 25-830-10 *et seq*.). Each Tidewater locality must adopt a program based on the Bay Act and *Regulations*. The Bay Act and *Regulations* recognize local government responsibility for land use decisions and are designed to establish a framework for compliance without dictating precisely what local programs must look like. Local governments have flexibility to develop water quality preservation programs that reflect unique local characteristics and embody other community goals. Such flexibility also facilitates innovative and creative approaches in achieving program objectives. The regulations address nonpoint source pollution by identifying and protecting certain lands called Chesapeake Bay Preservation Areas. The regulations use a resource-based approach that recognizes differences between various land forms and treats them differently.

4(b) Chesapeake Bay Preservation Areas. DEQ-OWLGAP notes that, in Fairfax County, the areas protected by the Bay Act, as locally implemented, require conformance with performance criteria. These areas include RPAs and Resource Management Areas (RMAs) as designated by the local government. RPAs include:

- tidal wetlands;
- certain non-tidal wetlands;
- tidal shores; and
- a 100-foot vegetated buffer area located adjacent to and landward of these features and along both sides of any water body with perennial flow.

RMAs, which require less stringent performance criteria, include those areas of the county not included in the RPAs.

4(c) Agency Findings. DEQ-OWLGAP notes that the Full Implementation Alternative would result in approximately 23.2 acres of permanent RPA encroachments within 84 acres and the creation of an additional 36.3 acres of impervious cover. DAA is bordered to the north and east by Accotink Creek and most (but not all) of the RPA encroachments would occur in this area. The Federal Consistency Determination (DEIS, Section 7) Coastal Zone Management section (pages 7-8) states that “RPA impacts would be…offset by management measures to be developed by project proponents in coordination with Fort Belvoir Directorate of Public Works, Environmental Division, as necessary and appropriate.” Figures 4.7-3 (RPA Impacts-Full Implementation scenario), 4.7-5 (Floodplain Impacts-FIA) and 4.8-1 (Vegetation Impact) all show extensive impacts to the mapped RPA buffers.

4(d) Requirements. Under the Coastal Lands Management enforceable policy of Virginia’s federally approved Coastal Zone Management Program, federal actions on installations located within Tidewater Virginia are required to be consistent to the maximum extent practicable with the performance criteria of the *Regulations* on lands analogous to locally designated RPAs and RMAs, as provided in 9 VAC 25-830-130 and 140, including the requirements to:

- minimize land disturbance (including access and staging areas),
- retain existing vegetation,
- minimize impervious cover,
- comply with the requirements of the *Virginia Erosion and Sediment Control Handbook* for land disturbance over 2,500 square feet, and
- satisfy stormwater management criteria consistent with water quality protection provisions of the *Virginia Stormwater Management Regulations*.

In addition to the general performance criteria referenced above, the *Regulations* (9 VAC 25-830-140 1.) limit land-disturbing activities in RPAs to water-dependent facilities/uses and redevelopment activities, and requires a site-specific RPA delineation, and the submittal of a Water Quality Impact Assessment (WQIA). This will require the development of site plan drawings and other necessary documentation for each project.

Given the 30-year timeframe, the extensive scope of construction activities referenced in the ADP (as well as the general nature of the proposed construction activities, with no current site plans for review), and the potential for significant impacts to RPA buffers, review for consistency with the Bay Act and *Regulations* must be done on an individual project basis.

4(e) Conclusion. DEQ-OWLGAP concludes that, as currently proposed, there is insufficient information in the DEIS to determine whether individual projects comply with the Bay Act and the *Regulations*. Compliance would be determined upon the Army's submission of the information described above for individual projects as they are implemented.

5. Air Pollution Control. The DEIS (Table 6.3-1, Summary of Impacts from the Proposed Action, page 6-6) finds that short-term, less-than-significant adverse impacts on air quality from the generation of fugitive dust and emissions of exhaust fumes from construction-related equipment and vehicles would occur under the Full Implementation Alternative. No new permanent sources of emissions would be established at DAAF by the proposed facilities nor would they contribute to exceedances of NAAQS or the degradation of regional air quality. Long-term adverse impacts on air quality resulting from additional mobile sources during operation (i.e., increased vehicle use) would be less than significant. Short-term impacts under the Partial Implementation Alternative would be similar to those under the Full Implementation Alternative. Long-term impacts would be less substantial due to the reduced scope of this alternative.

5(a) Agency Jurisdiction. The DEQ Air Division, on behalf of the State Air Pollution Control Board, is responsible for developing regulations that implement Virginia's Air Pollution Control Law (Virginia Code §10.1-1300 *et seq.*). DEQ is charged with carrying 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 DEQ regional office is directly responsible for the issuance of necessary permits to construct and operate all stationary sources in the region as well as monitoring emissions from these sources for compliance.

The Air Division regulates emissions of air pollutants from industries and facilities and implements programs designed to ensure that Virginia meets national air quality standards. The most common regulations associated with major State projects are:

- Open burning: 9 VAC 5-130 *et seq.*
- Fugitive dust control: 9 VAC 5-50-60 *et seq.*
- Permits for fuel-burning equipment: 9 VAC 5-80-1100 *et seq.*

5(b) Agency Findings. According to the DEQ Air Division, the project site is located in a designated ozone nonattainment area and an emission control area for the control of oxides of nitrogen (NO_x) and volatile organic compounds (VOCs).

5(c) Recommendation. The Army should take all reasonable precautions to limit emissions of NO_x and VOCs, principally by controlling or limiting the burning of fossil fuels.

5(d) Requirements.

(i) 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.

(ii) Asphalt Paving

In accordance with 9 VAC 5-45-780, there are limitations on the use of "cut-back" (liquefied asphalt cement, blended with petroleum solvents) that may apply to paving activities associated with the project. Moreover, there are time-of-year restrictions on its use during the months of April through October in VOC emission control areas.

(iii) Open Burning

If project activities include the open burning of construction material or the use of special incineration devices, this activity must meet the requirements under 9 VAC 5-130 *et seq.* of the *Regulations* for open burning, and may require a permit. The *Regulations* provide for, but do not require, the local adoption of a model ordinance concerning open burning. The applicant should contact Fairfax County fire officials to determine what local requirements, if any, exist.

(iv) Fuel Burning Equipment

The installation of fuel burning equipment (e.g. boilers and generators), may require permitting from DEQ prior to beginning construction of the facility (9 VAC 5-80, Article 6, Permits for New and Modified Sources). The applicant should contact DEQ-NRO for guidance on whether this provision applies.

6. Solid and Hazardous Wastes and Hazardous Materials. According to the DEIS (Table 6.3-1, Summary of Impacts from the Proposed Action, page 6-10), under the Full Implementation Alternative, short- and long-term, less-than-significant adverse impacts from hazardous materials and wastes due to use and handling of such materials during construction activities, as well as from the potential for accidental spills or discovery of contaminated soils. No permanent adverse impacts from hazardous materials and waste since there would be no changes in the quantity of hazardous materials and waste used at DAAF or in the capacity of Fort Belvoir to manage these substances. Under the Partial Implementation Alternative, short- and long-term impacts would be similar to those under the Full Implementation Alternative. Impacts would be less substantial due to the reduced scope of this alternative.

6(a) Agency Jurisdiction. On behalf of the Virginia Waste Management Board, the DEQ Division of Land Protection and Revitalization (DEQ-DLPR) is responsible for carrying out the mandates of the Virginia Waste Management Act (Virginia Code §10.1-1400 *et seq*.), as well as meeting Virginia's federal obligations under the Resource Conservation and Recovery Act (RCRA) and the Comprehensive Environmental Response Compensation Liability Act (CERCLA), commonly known as Superfund. DEQ-DLPR also administers laws and regulations on behalf of the State Water Control Board governing Petroleum Storage Tanks (Virginia Code §62.1-44.34:8 *et seq*.), including Aboveground Storage Tanks (9 VAC 25-91 *et seq*.) and Underground Storage Tanks (9 VAC 25-580 *et seq*. and 9 VAC 25-580-370 *et seq*.), also known as 'Virginia Tank Regulations', and § 62.1-44.34:14 *et seq*. which covers oil spills.

Virginia:

- Virginia Waste Management Act, Virginia Code § 10.1-1400 *et seq.*
- *Virginia Solid Waste Management Regulations*, 9 VAC 20-81 (9 VAC 20-81-620

applies to asbestos-containing materials)
- *Virginia Hazardous Waste Management Regulations*, 9 VAC 20-60 (9 VAC 20-60-261 applies to lead-based paints)
- *Virginia Regulations for the Transportation of Hazardous Materials*, 9 VAC 20-110.

Federal:

- Resource Conservation and Recovery Act, 42 U.S. Code sections 6901 *et seq.*
- U.S. Department of Transportation *Rules for Transportation of Hazardous Materials*, 49 *Code of Federal Regulations*, Part 107
- Applicable rules contained in Title 40, *Code of Federal Regulations*.

6(b) Agency Findings. DEQ-DLPR conducted a search of the project area of solid and hazardous waste databases (including petroleum releases) to identify waste sites in close proximity (500-foot radius) to the project area. The search identified one solid waste permit and eleven petroleum releases within the project area which might impact individual project. See DEQ-DLPR comments attached for a detailed list of these sites.

6(c) Requirements.

(i) Solid and Hazardous Waste Management

Any soil, sediment or groundwater that is suspected of contamination or wastes that are generated must be tested and disposed of in accordance with applicable federal, state, and local laws and regulations. All construction waste must be characterized in accordance with the *Virginia Hazardous Waste Management Regulations* prior to management at an appropriate facility.

(ii) Petroleum Contamination

If evidence of a petroleum release is discovered during construction, it must be reported to DEQ-NRO in accordance with Virginia Code § 62.1-44.34.8 through 9 and 9 VAC 25-580-10 *et seq*. Petroleum-contaminated soils and groundwater that is generated during project implementation must be characterized and disposed of properly.

(iii) Petroleum Storage Tanks

The removal, relocation or closure of any regulated petroleum storage tanks, either an aboveground storage tank (AST) or an underground storage tank (UST), must be conducted in accordance with the requirements of the Virginia Tank Regulations 9 VAC 25-91-10 *et seq*. (AST) and/or 9 VAC 25-580-10 *et seq*. (UST). Documentation must be submitted DEQ-NRO.

The installation and operation of regulated petroleum ASTs or USTs must be conducted

in accordance with 9 VAC 25-91-10 *et seq*. and/or 9 VAC 25-580-10 *et seq*. Furthermore, the installation and use of ASTs with a capacity of greater than 660 gallons for temporary fuel storage (>120 days) during construction must follow the requirements in 9 VAC 25-91-10 *et seq*.

(iv) Asbestos-Containing Materials 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 9 VAC 20-81-620 (ACM) and 9 VAC 20-60-261 (LBP) must be followed. Questions may be directed to at the DEQ-NRO, Richard Doucette at (703) 583-3800 or richard.doucette@deq.virginia.gov.

6(d) Recommendations.

(i) Petroleum Release Sites

The identified Pollution Complaint (PC) cases should be further evaluated by the Army to establish the exact location, nature and extent of the petroleum release and its potential to impact individual project sites. Coordinate with the DEQ-NRO Tanks Program at (703) 583-3800, for additional information on the PC case.

(ii) Pollution Prevention

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.

For additional questions or further information regarding waste comments, contact DEQ-DLPR, Carlos Martinez at (804) 698-4575 or carlos.martinez@deq.virginia.gov.

7. 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 to the extent feasible. Contact the Department of Agriculture and Consumer Services at (804) 786-3501 for more information.

8. Natural Heritage Resources. According to the DEIS (page 3-68), a baseline Natural Heritage Inventory of Fort Belvoir (Main Post and FBNA) was performed by Virginia Department of Conservation and Recreation's Natural Heritage Program to identify unique or exemplary natural communities, rare plants and animals, and other significant natural areas. The inventory identified four rare plant species and three 'watchlist' plant

species. The four rare plant species, velvety sedge (*Carex vestita*), vetchling (*Lathyrus palustris*), water plantain crowfoot (*Ranunculus ambigens*), and river bulrush (*Scirpus fluviatilis*), occur in the freshwater tidal marsh wetlands within the Accotink Bay Wildlife Refuge. The locations of three watchlist species, creeping spikerush (*Eleocharis smallii*), blueflag (*Iris versicolor*), and giant bur-reed (*Sparganium eurycarpum*), were not identified although all are wetland species.

8(a) Agency Jurisdiction.

(i) The Virginia Department of Conservation and Recreation's (DCR) Division of Natural Heritage (DNH).

DNH's mission is conserving Virginia's biodiversity through inventory, protection and stewardship. The Virginia Natural Area Preserves Act (Virginia Code §10.1-209 through 217), authorizes DCR to maintain a statewide database for conservation planning and project review, protect land for the conservation of biodiversity, and protect and ecologically manage the natural heritage resources of Virginia (the habitats of rare, threatened and endangered species, significant natural communities, geologic sites, and other natural features).

(ii) The Virginia Department of Agriculture and Consumer Services (VDACS).

The Endangered Plant and Insect Species Act of 1979 (Virginia Code Chapter 39 §3.1-1020 through 1030) authorizes VDACS to conserve, protect and manage endangered and threatened species of plants and insects. Under a Memorandum of Agreement established between VDACS and the DCR, DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species.

8(b) Agency Findings.

(i) Accotink Bay-Gunston Cove Stream Conservation Unit

According to the information currently in DCR files, the Accotink Bay-Gunston Cove Stream Conservation Unit is located downstream of the project site. The SCU has been given a biodiversity ranking of B5, which represents a site of general significance. The natural heritage resources associated with this site are:

Lampsilis radiate	Eastern lampmussel	G5/S2S3/NL/NL
Glyptemys insculpta	Wood turtle	G3/S2/NL/LT

See DCR-DNH comments attached for more detailed information on these resources.

(ii) Accotink Wetlands Conservation Site

DCR-DNH finds that the Accotink Wetlands Conservation Site is located downstream of the project site. Accotink Wetlands Conservation Site has been given a biodiversity significance ranking of B3, which represents a site of high significance. The natural heritage resources of concern at this site are:

Lathyrus palustris	Marsh pea	G5/S1/NL/NL
Bolboschoenus fluviatilis	River bulrush	G5/S2/NL/NL
Ranunculus ambigens	Water-plantain crowfoot	G4/S1/NL/NL
Carex vestita	Velvet sedge	G5/S2/NL/NL
Tidal Freshwater Marsh (Mixed High Marsh Type)		G3/S4?/NL/NL
Coastal Plain/Outer Piedmont Acidic Seepage Swamp		G3?/S3/NL/NL
Northern Coastal Plain/Piedmont Mesic Mixed Hardwood Forest		G5/S5/NL/NL

See DCR-DNH comments attached for more detailed information on these resources.

(iii) State-listed Plant and Insect Species

DCR-DNH finds that the activity will not affect any documented state-listed plants or insects at the site.

(iv) 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.

8(c) Recommendations.

(i) Erosion and Sediment Control and Stormwater Management

DCR supports the implementation of and strict adherence to applicable state and local erosion and sediment control and stormwater management laws and regulations as stated in the DEIS (page 6-2), to minimize adverse impacts to the aquatic ecosystems as a result of the proposed activities.

(ii) Fort Belvoir Forest and Wildlife Corridor

DCR supports excluding development within the Fort Belvoir Forest and Wildlife Corridor (FWC) as stated in the DEIS (page 3-81), and the implementation of a time-of-year restriction for tree clearing to minimize adverse impacts to bat species as stated on page 6-3.

(iii) Protected Species

DCR supports continued coordination with the US Fish and Wildlife Service (USFWS) and the Virginia Department of Wildlife Resources, to ensure compliance with protected species legislation due to the legal status of state- and federally-listed species documented near the project area (DEIS, Table 3.8-3).

(iv) Natural Heritage Resources

Contact DCR-DNH to secure updated information on natural heritage resources if the scope of the project changes or six months pass before the project is implemented, since new and updated information is continually added to the Biotics Data System.

9. Wildlife Resources and Protected Species. According to the DEIS (Table 6.3-1, Summary of Impacts from the Proposed Action, page 6-9), the Full Implementation Alternative would result in long-term, less-than-significant adverse impacts on plant communities and forest resources from vegetation removal (and associated displacement of common wildlife species) and indirectly introduce invasive species or create edge habitats. Short- and long-term, intermittent, less-than-significant adverse impacts on aquatic macroinvertebrates and fish may occur from degraded water quality resulting from increased concentrations of pollutants and sediments in runoff discharged to receiving water bodies. Long-term, less-than-significant adverse impacts on wildlife from the loss of approximately 9 acres of vegetation and forested habitat, and encroachment on approximately 21 acres of Breeding Birds of Management Concern (BBMC) habitat. No federally-listed threatened or endangered species have been documented at DAAF; as such, adverse impacts would not be anticipated. Under the Partial Implementation Alternative, impacts would be less substantial due to the reduced scope of this alternative. This alternative would permanently encroach on approximately 18 acres of BBMC habitat.

9(a) Agency Jurisdiction. The Virginia Department of Wildlife Resources (DWR), 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). DWR is a consulting agency under the U.S. Fish and Wildlife Coordination Act (16 U.S. Code §661 *et seq*.) and provides environmental analysis of projects or permit applications coordinated through DEQ and several other state and federal agencies. DWR determines likely impacts upon fish and wildlife resources and habitat, and recommends appropriate measures to avoid, reduce or compensate for those impacts. For more information, see the DWR website at *www.dwr.virginia.gov*.

9(b) Agency Findings. DWR documents the state-listed endangered Tri-colored bat and the state-listed threatened Wood turtle from the project area. Accotink Creek has been designated a Threatened and Endangered Species Water due to the presence the Wood turtle. It does not appear Accotink Creek or its riparian habitats are proposed for

impacts. As such, DWR does not anticipate this project to result in adverse impacts upon Wood turtles. DWR finds the Proposed Action to be consistent with the Fisheries Management Enforceable Policy of the Virginia CZM Program provided strict adherence to erosion and sediment control standards is maintained.

9(c) Recommendations.

(i) Tri-Colored Bat

DWR recommends that tree removal and timbering activities adhere to a time-of-year restriction from April 1 through August 31 of any year to protect this species from harm.

(ii) Wood Turtle

DGIF recommends additional coordination with DWR to ensure protection of the Wood turtle and its habitat, if instream work in Accotink Creek and/or work within naturally vegetated habitats within 900 feet of Accotink Creek are proposed.

(iii) General Protection of Wildlife Resources

DGIF offers the following recommendations to minimize overall impacts to wildlife and natural resources:

- Avoid and minimize impacts to undisturbed forest, wetlands, and streams to the fullest extent practicable.
- Adhere to a time-of-year restriction protective of resident and migratory songbird nesting from March 15 through August 15 of any year for all tree removal and ground clearing.
- Adhere to erosion and sediment controls during ground disturbance.
- Use matting made from natural organic materials such as coir fiber, jute, and/or burlap to minimize potential wildlife entanglements resulting from use of synthetic/plastic erosion and sediment control matting.
- Design stormwater controls 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 (i.e. rain gardens) and grass swales are components of Low Impact Development (LID). They capture stormwater runoff as close to the source as possible, allow it to slowly infiltrate into the surrounding soil, and benefit natural resources by filtering pollutants and decreasing downstream runoff volumes.

(iv) Fort Belvoir Integrated Natural Resources Management Plan

DGIF recommends adherence to the currently approved Fort Belvoir Integrated Natural Resources Management Plan.

10. Historic and Archeological Resources. The DEIS (Table 6.3-1, Summary of Impacts from the Proposed Action, page 6-5) finds that short-term, less-than-significant, indirect adverse effects on architectural resources in the Area of Potential Effect (APE) would occur due to changes in the viewshed or noise environment. No ground disturbance would occur within a 50-foot radius of the known, non-listed, non-eligible archaeological sites on DAAF. Any potential indirect effects would be negligible through adherence to standard construction site BMPs. In the unlikely event that an inadvertent discovery of undocumented archaeological materials or human remains occurs during ground disturbing activities, work would stop immediately and the Army would adhere to the policies and procedures for such discoveries in Fort Belvoir's Integrated Cultural Resources Management Plan (ICRMP). Impacts under the Partial Implementation Alternative would be similar to those under the Full Implementation Alternative.

10(a) Agency Jurisdiction. The Virginia Department of Historic Resources (DHR) conducts reviews of both federal and state projects to determine their effect on historic properties. Under the federal process, DHR is the State Historic Preservation Office, and ensures that federal undertakings-including licenses, permits, or funding-comply with Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation at 36 CFR Part 800. Section 106 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. For state projects or activities on state lands, DHR is afforded an opportunity to review and comment on (1) the demolition of state property; (2) major state projects requiring an EIR; (3) archaeological investigations on state-controlled land; (4) projects that involve a landmark listed in the Virginia Landmarks Register; (5) the sale or lease of surplus state property; (6) exploration and recovery of underwater historic properties; and (7) excavation or removal of archaeological or historic features from caves. Please see DHR's website for more information about applicable state and federal laws and how to submit an application for review: http://www.dhr.virginia.gov/StateStewardship/Index.htm.

10(b) Agency Findings. According to DHR, the Army initiated consultation with DHR in 2018 on this undertaking pursuant to Section 106 of the National Historic Preservation Act, as amended, and its implementing regulation 36 CFR Part 800. Since that time, the Army has consulted with DHR on individual projects associated with the Davison Army Airfield Development plan under the same authority. DHR anticipates the Army will continue NHPA consultations as projects at DAAF mature beyond the conceptual phase.

10(c) Requirement. The Army must to continue to consult with DHR under Section 106 on future undertakings occurring at DAAF.

11. Public Water Supply. According to the DEIS (page 3-46), potable water supply and distribution at Fort Belvoir, including DAAF, is provided and maintained by a private contractor. There are no active drinking water wells on DAAF.

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, springs and surface water intakes). VDH administers both federal and state laws governing waterworks operation.

11(b) Agency Findings. VDH-ODW concurs that there are no public groundwater wells within a 1-mile radius of the project site and DAAF is not within the watershed of any public surface water intakes. However, the Fairfax County Watery Authority (PWS ID 6059501) Occoquan Reservoir Intake is located within a 5-mile radius of DAAF.

11(c) Requirements. Potential impacts to public water distribution systems or sanitary sewage collection systems must be verified by the utility provider.

11(d) Recommendations. VDH-ODW recommends that Best Management Practices be employed on the project sites, including erosion and sediment controls and Spill Prevention Controls and Countermeasures. Materials should be managed on site and during transport to prevent impacts to nearby surface water.

For additional information, contact VDH-ODW, Arlene Fields Warren at (804) 864-7781 or arlene.warren@vdh.virginia.gov.

12. Floodplain Management. According to the DEIS (Table 6.3-1, Summary of Impacts from the Proposed Action, page 6-8), under the Full Implementation Alternative, long-term, less-than-significant adverse impacts on the 100-year floodplain from development of approximately 7.5 acres in the floodplain on DAAF. The maximum increase to the horizontal extent of the floodplain on DAAF would not exceed 2 feet. Potential adverse impacts of increased flooding downstream of DAAF would occur on land within Fort Belvoir in conservation status. Therefore, risks to life and property from flooding downstream of DAAF would be minimal. Under the Partial Implementation Alternative, less-than-significant impacts on other water resources would be similar to those under the Full Implementation Alternative. Approximately 3.2 acres of the 100-year floodplain on DAAF would be developed under this alternative.

12(a) Agency Jurisdiction. The DCR Division of Dam Safety and Floodplain Management (DSFM) is the lead coordinating agency for the Commonwealth's floodplain management program and the National Flood Insurance Program (Executive Oder 45). The National Flood Insurance Program (NFIP) is administered by the Federal Emergency Management Agency (FEMA), and communities who elect to participate in this voluntary program manage and enforce the program on the local level through that community's local floodplain ordinance. Each local floodplain ordinance must comply

with the minimum standards of the NFIP, outlined in 44 CFR 60.3; however, local communities may adopt more restrictive requirements in their local floodplain ordinance, such as regulating the 0.2% annual chance flood zone (shaded Zone X).

12(b) Requirements. All development within a Special Flood Hazard Area (SFHA) or floodplain, as shown on the locality's Flood Insurance Rate Map (FIRM), must be permitted and comply with the requirements of the local floodplain ordinance. Projects conducted by federal agencies within the SFHA must comply with federal Executive Order 11988: Floodplain Management.

DCR's Floodplain Management Program does not have regulatory authority for projects in the SFHA. The Army must contact the local floodplain administrator for an official floodplain determination and comply with the community's local floodplain ordinance, including receiving a local permit. Failure to comply with the local floodplain ordinance could result in enforcement action from the locality. The Army is encouraged to reach out to the local floodplain administrator to ensure compliance with the local floodplain ordinance.

12(c) Recommendations. DCR recommends the Army access the Virginia Flood Risk Information System (VFRIS). Local floodplain administrator contact information may be found on DCR's Local Floodplain Management Directory.

For additional information, contact DCR-DSFM, Kristin Owen at (804) 786-2886 or kristin.owen@dcr.virginia.gov.

13. Aviation Impacts. The DEIS (page 3-3) states that the Proposed Action would remove obstructions that currently penetrate the Primary Surface and Transitional Surface of the airfield. This would improve the safety of aircraft operations and have a positive effect on airspace management. Additionally, the Proposed Action would not include substantial changes in missions, air operations, or the number of aircraft or personnel at DAAF.

13(a) Agency Jurisdiction. The Virginia Department of Aviation (DoAv) plans for the development of the state aviation system; promotes aviation; grants aircraft and airports licenses; and provides financial and technical assistance to cities, towns, counties and other governmental subdivisions for the planning, development, construction and operation of airports, and other aviation facilities.

13(b) Agency Findings. DoAv has no comments on the Proposed Action.

For additional information, contact DoAv, Rusty Harrington at (804) 236-3632 x110 or rusty.harrington@doav.virginia.gov.

14. Pollution Prevention. DEQ advocates that principles of pollution prevention and sustainability be used in all construction projects as well as in facility operations.

Effective siting, planning, and on-site BMPs will help to ensure that environmental impacts are minimized. However, pollution prevention and sustainability 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 and operation of this facility:

- Consider development of an effective Environmental Management System (EMS). An effective EMS will ensure that the proposed facility 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 (VEEP). VEEP provides recognition, annual permit fee discounts, and the possibility for alternative compliance methods.
- 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.
- Integrate pollution prevention techniques into the facility maintenance and operation. 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, Meghann Quinn at (804) 698-4021 or meghann.quinn@deq.virginia.gov.

15. Energy Conservation. New construction 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);
- high-efficiency heating, ventilation, air conditioning systems; and
- high-efficiency lighting systems and daylighting techniques.

The Department of Mines, Minerals and Energy should be contacted, David Spears at (434) 951-6350 or david.spears@dmme.virginia.gov, for assistance in meeting this challenge.

16. Water Conservation. The following recommendations will result in reduced water use associated with the operation of the facility.

- Grounds should be landscaped with hardy native plant species to conserve water as well as lessen the need to use fertilizers and pesticides.
- Convert turf to low water-use landscaping such as drought resistant grass, plants, shrubs and trees.
- Low-flow toilets should be installed.
- Consider installing low flow restrictors and aerators to faucets.
- Improve irrigation practices by:
    - upgrading sprinkler clock; water at night, if possible, to reduce evapotranspiration (lawns need only 1 inch of water per week, and do not need to be watered daily; overwatering causes 85% of turf problems);
    - installing a rain shutoff device; and
    - collecting rainwater with a rain bucket or cistern system with drip lines.
    - Check for and repair leaks (toilets and faucets) during regular routine maintenance activities.

REGULATORY AND COORDINATION NEEDS

1. Surface Waters and Wetlands.

1(a) Virginia Water Protection Permit. Surface water and wetland impacts associated with projects in the Proposed Action may require VWP Permit authorization from DEQ-NRO pursuant to Virginia Code §62.1-44.15:20. A Joint Permit Application may be obtained from and submitted to the VMRC which serves as a clearinghouse for the joint permitting process involving the VMRC, DEQ, Corps, and local wetlands boards. For additional information and coordination, contact DEQ-NRO, Trisha Beasley at (703) 583-3940 or trisha.beasley@deq.virginia.gov. Questions or coordination for potential impacts to tidal wetlands under VMRC jurisdiction may be directed to Mark Eversole at (757) 247-8028 or mark.eversole@mrc.virginia.gov.

1(b) Virginia Pollutant Discharge Elimination System. Projects must comply with the facilities existing VPDES individual permit (VA0092771). If it is determined that a project will result in changes affecting coverage under the individual permit (e.g. adding or removing outfalls, adding or removing discharges), the Army must initiate consultation with DEQ-NRO. For additional information and coordination, contact the VPDES program at DEQ-NRO, Bryant Thomas at (703) 583-3843 or bryant.thomas@deq.virginia.gov.

2. State Subaqueous Lands. If it is anticipated that state jurisdictional bottom lands would be impacted by project construction, JPAs must be submitted as necessary to VMRC for review. Questions or further coordination may be directed to VMRC, Mark Eversole at (757) 247-8028 or mark.eversole@mrc.virginia.gov.

3. Erosion and Sediment Control and Stormwater Management.

3(a) Erosion and Sediment Control and Stormwater Management. Proposed projects must comply with Virginia's *Erosion and Sediment Control Law* (Virginia Code § 62.1-44.15:61) and *Regulations* (9 VAC 25-840-30 *et seq*.) and *Stormwater Management Law* (Virginia Code § 62.1-44.15:31) and *Regulations* (9 VAC 25-870-210 *et seq*.) as administered by DEQ. Activities that disturb 2,500 square feet or more in CBPAs would be regulated by *VESCL&R* and *VSWML&R*. Erosion and sediment control, and stormwater management requirements should be coordinated with DEQ-NRO, Kelly Vanover at (804) 837-1073 or kelly.vanover@deq.virginia.gov.

3(b) General Permit for Stormwater Discharges from Construction Activities (VAR10). For land-disturbing activities of equal to or greater than one acre, the applicant is required to apply for registration coverage under the Virginia Stormwater Management Program General Permit for Discharges of Stormwater from Construction Activities (9 VAC 25-880-1 *et seq.*). Specific questions regarding the Stormwater Management Program requirements should be directed to DEQ-NRO, Kelly Vanover at (804) 837-1073 or kelly.vanover@deq.virginia.gov.

4. Chesapeake Bay Preservation Areas. Projects must be constructed and operated in a manner which is consistent with the coastal lands management enforceable policy of the CZM program which is administered through the Bay Act (Virginia Code §§ 10.1-2100 through 10.1-2114) and *Regulations* (9 VAC 25-830-10 *et seq*.). Land-disturbing activities in RPAs are limited to water-dependent facilities/uses and redevelopment activities (9 VAC 25-830-140 1.). In addition, the projects are subject to the general performance criteria of 9 VAC 25-830-130 for construction in lands analogous to RPA and RMA. Project compliance will be determined upon the submission of site specific information as projects are implemented. For additional information and future coordination, contact DEQ-OWLGAP, Daniel Moore at (804) 698-4520 or daniel.moore@deq.virginia.gov.

5. Air Quality Regulations. Project in the Proposed Action are subject to air regulations administered by DEQ. The following sections of the Code of Virginia and Virginia Administrative Code are applicable:

- asphalt paving operations (9 VAC 5-45-780 *et seq*.);
- fugitive dust and emissions control (9 VAC 5-50-60 *et seq*.); and
- open burning restrictions (9 VAC 5-130).

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 construction. Also, contact Fairfax County fire officials for information on any local requirements pertaining to open burning. For more information and coordination contact DEQ-NRO, Justin Wilkinson at (703) 583-3820 or justin.wilkinson@deq.virginia.gov.

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. For additional information concerning location and availability of suitable waste management facilities in the project area or if free product, discolored soils, or other evidence of contaminated soils are encountered, contact DEQ-NRO, Richard Doucette at (703) 583-3813 or richard.doucette@deq.virginia.gov.

6(a) Asbestos-Containing Material. The owner or operator of a demolition activity, prior to the commencement of the activity, is responsible to thoroughly inspect affected structures 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-NRO, Richard Doucette at (703) 583-3813 or richard.doucette@deq.virginia.gov and the Department of Labor and Industry, Doug Wiggins (540) 562-3580 ext. 131 for additional information.

6(b) Lead-Based Paint. The Proposed Action 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 at (804) 367-8500.

6(c) Petroleum Contamination. In accordance with Virginia Code §§ 62.1-44.34.8 through 9 and 9 VAC 25-580-10 *et seq*., site activities involving excavation or disturbance of petroleum contaminated soils and or groundwater must be reported to DEQ-NRO, Randy Chapman at (703) 583-3816 or randy.chapman@deq.virginia.gov.

6(d) Petroleum Storage Tank Compliance and Inspection. The installation and use of an AST of greater than 660 gallons for temporary fuel storage of more than 120 days must comply with the requirements in 9 VAC 25-91-10 *et seq*. Contact DEQ-NRO, Riaz Syed at (703) 583-3915 or riaz.syed@deq.virginia.gov.

7. Natural Heritage Resources. Contact DCR-DNH, Rene Hypes at (804) 371-2708 or rene.hypes@dcr.virginia.gov, to secure updated information on natural heritage resources as the projects are implemented, since new and updated information is continually added to the Biotics Data System.

8. Wildlife Resources and Protected Species. Contact DWR, Amy Ewing at (804) 367-2211 or amy.ewing@dwr.virginia.gov for the development of project-specific measures to minimize project impacts upon wildlife resources.

9. Historic and Archaeological Resources. The Army must continue to consult with DHR under Section 106 NHPA, as individual projects associated with the Davison Army

Airfield Area Development Plan mature beyond the conceptual phase. For additional information and coordination, contact DHR, Marc Holma at (804) 482-6090 or marc.holma@dhr.virginia.gov.

10. Floodplain Management. Projects in the Proposed Action must be implemented in compliance with Fairfax County's local floodplain ordinance. Local floodplain administrator contact information may be found on DCR's Local Floodplain Management Directory.

Thank you for the opportunity to review the Draft Environmental Impact Statement and Federal Consistency Determination for the Davison Army Airfield Area Development Plan in Fairfax County. Detailed comments of reviewing agencies are attached for your review. Please contact me at (804) 698-4204 or John Fisher at (804) 698-4339 for clarification of these comments.

Sincerely,



Bettina Rayfield, Program Manager
Environmental Impact Review and Long-Range Priorities

Enclosures

Ec: Amy Ewing, DWR
Robbie Rhur, DCR
Arleen Warren, VDH
Mark Eversole, VMRC
Roger Kirchen, DHR
Rusty Harrington, DoAv
Denise James, Fairfax County
Robert Lazaro, NVRC

MEMORANDUM

TO: John Fisher, DEQ/EIR Environmental Program Planner

FROM: Carlos A. Martinez, Division of Land Protection & Revitalization Review Coordinator

DATE: August 12, 2020

COPIES: Sanjay Thirunagari, Division of Land Protection & Revitalization Review Manager; file

SUBJECT: Environmental Impact Review: 20-110F Davison Army Airfield Area Development Plan in Fort Belvoir, Virginia.

The Division of Land Protection & Revitalization (DLPR) has completed its review of the DOD/Department of the Army's July 29, 2020 EIR for Davison Army Airfield Area Development Plan in Fort Belvoir, Virginia.

DLPR staff conducted a search (500 ft. radius) of the project area of solid and hazardous waste databases (including petroleum releases) to identify waste sites in close proximity to the project area. DLPR identified one (1) solid waste permit and eleven (11) petroleum releases within the project area which might impact the project.

DLPR staff has reviewed the submittal and offers the following comments:

***Hazardous Waste/RCRA Facilities* – none in close proximity to the project area**

***CERCLA Sites* – none in close proximity to the project area**

***Formerly Used Defense Sites (FUDS)* – none in close proximity to the project area**

***Solid Waste* – One (1) solid waste permit in close proximity to the project area**

PMT ID: 900000001050, Yurek, Telegraph Rd and Potomac River, Fort Belvoir, Virginia 22060.

***Virginia Remediation Program (VRP)* – none in close proximity to the project area**

<u>Petroleum Releases</u> – Eleven (11) in close proximity to the project area

1. ***PC Number 20033172, Fort Belvoir Building 3128 – Davison Airfield, Telegraph Rd and Potomac River, Fort Belvoir, Virginia 22060, Release Date: 02/24/2003, Status: Closed.***

2. ***PC Number 20123217, Fort Belvoir – DAAF POL Yard – Bldg 3162, 6970 Britten Dr, Fort Belvoir, Virginia 22060, Release Date: 06/06/2012, Status: Closed.***

3. ***PC Number 19993355, Fort Belvoir Building – Building 03138, Telegraph Rd and Potomac River, Fort Belvoir, Virginia 22060, Release Date: 05/07/1999, Status: Closed.***

4. ***PC Number 19922217, Fort Belvoir Building – Building 03140, Telegraph Rd and Potomac River, Fort Belvoir, Virginia 22060, Release Date: 06/26/1992, Status: Closed.***

5. ***PC Number 20023026, Fort Belvoir Building – Building 03146, Telegraph Rd and Potomac River, Fort Belvoir, Virginia 22060, Release Date: 07/06/2001, Status: Closed.***

6. ***PC Number 19920905, Fort Belvoir Building – Building 3118, Telegraph Rd and Potomac River, Fort Belvoir, Virginia 22060, Release Date: 11/14/1991, Status: Closed.***

7. ***PC Number 20003092, Fort Belvoir Building – Building 03161, Telegraph Rd and Potomac River, Fort Belvoir, Virginia 22060, Release Date: 07/20/1999, Status: Closed.***

8. ***PC Number 20023027, Fort Belvoir Building – Building 03165, Telegraph Rd and Potomac River, Fort Belvoir, Virginia 22060, Release Date: 07/06/2001, Status: Closed.***

9. ***PC Number 20003093, Fort Belvoir Building – Building 03230, Telegraph Rd and Potomac River, Fort Belvoir, Virginia 22060, Release Date: 07/20/1999, Status: Closed.***

10. ***PC Number 20003094, Fort Belvoir Building – Building 03233, Telegraph Rd and Potomac River, Fort Belvoir, Virginia 22060, Release Date: 07/20/1999, Status: Closed.***

11. ***PC Number 20143100, Fort Belvoir Davison Airfield Bldg 3233, 6970 Britten Rd, Fort Belvoir, Virginia 22060, Release Date: 12/13/2013, Status: Closed.***

Please note that the DEQ's Pollution Complaint (PC) cases identified should be further evaluated by the project engineer or manager to establish the exact location, nature and extent of the petroleum release and the potential to impact the proposed project. In addition, the project engineer or manager should contact the DEQ's Northern Regional Office at (703) 583-3800 (Tanks Program) for further information about the PC cases.

PROJECT SPECIFIC COMMENTS

None

GENERAL COMMENTS

Soil, Sediment, Groundwater, and Waste Management

Any soil, sediment or groundwater that is suspected of contamination or wastes that are generated 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 20-81); 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.

Asbestos and/or Lead-based Paint

All structures being demolished/renovated/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 20-81-620 for ACM and 9VAC 20-60-261 for LBP must be followed. Questions may be directed to Richard Doucette at the DEQ's Northern Regional Office at (703) 583-3800.

Pollution Prevention – Reuse - Recycling

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 Carlos A. Martinez by phone at (804) 698-4575 or email carlos.martinez@deq.virginia.gov.

Commonwealth of Virginia

Fisher, John <john.fisher@deq.virginia.gov>

Re: NEW PROJECT Army Davison Army Airfield Area Development Plan, DEQ #20-110F

1 message

Holland, Benjamin <benjamin.holland@deq.virginia.gov> Thu, Aug 20, 2020 at 9:58 AM
To: John Fisher <John.Fisher@deq.virginia.gov>

Northern Regional Office comments regarding the EIR for *Davison Army Airfield Area Development Plan, DEQ #20-110F*, are as follows:

Land Protection Division – The project manager is reminded that if any solid or hazardous waste is generated/encountered during construction, the project manager would follow applicable federal, state, and local regulations for their disposal.

Air Compliance/Permitting - The project manager is reminded that during the construction phases that occur with this project; the project is subject to the Fugitive Dust/Fugitive Emissions Rule 9 VAC 5-50-60 through 9 VAC 5-50-120. In addition, should any open burning or use of special incineration devices be employed in the disposal of land clearing debris during demolition and construction, the operation would be subject to the Open Burning Regulation 9 VAC 5-130-10 through 9 VAC 5-130-60 and 9 VAC 5-130-100.

Virginia Water Protection Permit (VWPP) Program – The project manager is reminded that a VWP permit from DEQ may be required should impacts to surface waters be necessary. DEQ VWP staff recommends that the avoidance and minimization of surface water impacts to the maximum extent practicable as well as coordination with the US Army Corps of Engineers. Upon receipt of a Joint Permit Application for the proposed surface water impacts, DEQ VWP Permit staff will review the proposed project in accordance with the VWP permit program regulations and current VWP permit program guidance. VWPP staff reserve the right to provide comment upon receipt of a permit application requesting authorization to impact state surface waters, and at such time that a wetland delineation has been conducted and associated jurisdiction determination made by the U.S. Army Corps of Engineers.

Erosion and Sediment Control, Storm Water Management – DEQ has regulatory authority for the Virginia Pollutant Discharge Elimination System (VPDES) programs related to municipal separate storm sewer systems (MS4s) and construction activities. Erosion and sediment control measures are addressed in local ordinances and State regulations. Additional information is available at http://www.deq.virginia.gov/Programs/Water/StormwaterManagement.aspx. Non-point source pollution resulting from this project should be minimized by using effective erosion and sediment control practices and structures. Consideration should also be given to using permeable paving for parking areas and walkways where appropriate, and denuded areas should be promptly revegetated following construction work. If the total land disturbance exceeds 10,000 square feet, an erosion and sediment control plan will be required. Some localities also require an E&S plan for disturbances less than 10,000 square feet. A stormwater management plan may also be required. For any land disturbing activities equal to one acre or more, you are required to apply for coverage under the VPDES General Permit for Discharges of Storm Water from Construction Activities. The Virginia Stormwater Management Permit Authority may be DEQ or the locality.

Other VPDES and Petroleum Contamination – The construction project may require coverage under the VAG83 permit for discharges from petroleum contaminated sites, groundwater remediation, and hydrostatic tests for any hydrostatics tests on any new piping installed, or for any potential dewatering during construction if petroleum contamination is encountered.

The project should maintain compliance with the VPDES individual permit for the facility (VA0092771). If, as a result of the project, there will be any changes that would affect the coverage under the individual permit (adding or removing outfalls, adding or removing discharges), DEQ should be consulted and coordinated with. A mid-range project identified, construction of DCARNG Aircraft Wash Rack, could potentially have a resulting discharge to surface waters - DEQ recommends that the wash rack be connected to the sanitary sewer system otherwise any discharge to surface waters may result in the need for a VPDES permit.
The project should be done in accordance with Virginia Erosion and Sediment Control requirements, the construction stormwater GP as well as the Ft. Belvoir MS4 permit (VAR040093).

Commonwealth of Virginia

Fisher, John <john.fisher@deq.virginia.gov>

Re: NEW PROJECT Army Davison Army Airfield Area Development Plan, DEQ #20-110F

1 message

Gavan, Lawrence <larry.gavan@deq.virginia.gov> Wed, Jul 29, 2020 at 1:18 PM
To: "Fisher, John" <john.fisher@deq.virginia.gov>

(a) Agency Jurisdiction. The Department of Environmental Quality (DEQ) administers the *Virginia Erosion and Sediment Control Law and Regulations* (*VESCL&R*) and *Virginia Stormwater Management Law and Regulations* (*VSWML&R*).

(b) Erosion and Sediment Control and Stormwater Management Plans. The Applicant and its authorized agents conducting regulated land-disturbing activities on private and public lands in the state must comply with *VESCL&R* and *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, borrow areas, soil stockpiles, and related land-disturbing activities that result in the total land disturbance of equal to or greater than 10,000 square feet (2,500 square feet in Chesapeake Bay Preservation Area) would be regulated by *VESCL&R*. Accordingly, the Applicant must prepare and implement an erosion and sediment control (ESC) plan to ensure compliance with state law and regulations. Land-disturbing activities that result in the total land disturbance of equal to or greater than 1 acre (2,500 square feet in Chesapeake Bay Preservation Area) would be regulated by *VSWML&R*. Accordingly, the Applicant must prepare and implement a Stormwater Management (SWM) plan to ensure compliance with state law and regulations. The ESC/SWM plan is submitted to the DEQ Regional Office that serves the area where the project is located for review for compliance. The Applicant 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 62.1-44.15 et seq.]

(c) General Permit for Stormwater Discharges from Construction Activities (VAR10). DEQ 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 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 owner or operator of projects involving land-disturbing activities of equal to or greater than 1 acre is 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. Construction activities requiring registration also include 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 collectively 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 at: http://www.deq.virginia.gov/Programs/Water/StormwaterManagement/VSMPPermits/ConstructionGeneralPermit.aspx

MEMORANDUM

TO: John Fisher, DEQ Environmental Program Planner

FROM: Daniel Moore, DEQ Principal Environmental Planner

DATE: July 31, 2020

SUBJECT: DEQ #20-110F: US Army, Davison Army Airfield Area Development Plan, Ft. Belvoir, Fairfax County

We have reviewed the Draft Environmental Impact Statement/Federal Consistency Determination (DEIS/FCC) for the proposed Davison Army Airfield Area Development Plan at Fort Belvoir in Fairfax County and offer the following comments regarding consistency with the provisions of the *Chesapeake Bay Preservation Area Designation and Management Regulations* (Regulations):

In Fairfax County, the areas protected by the Chesapeake Bay Preservation Act, as locally implemented, require conformance with performance criteria. These areas include Resource Protection Areas (RPAs) and Resource Management Areas (RMAs) as designated by the local government. RPAs include tidal wetlands, certain non-tidal wetlands and tidal shores. RPAs also include a 100-foot vegetated buffer area located adjacent to and landward of these features and along both sides of any water body with perennial flow. RMAs, which require less stringent performance criteria, include those areas of the County not included in the RPAs.

Under the Federal Consistency Regulations of the *Coastal Zone Management Act of 1972*, federal actions in Virginia must be conducted in a manner "consistent to the maximum extent practicable" with the enforceable policies of the Virginia Coastal Zone Management Program. The coastal lands management enforceable policy is administered through the Chesapeake Bay Preservation Act and Regulations.

Federal actions on installations located within Tidewater Virginia are required to be consistent with the performance criteria of the Regulations on lands analogous to locally designated RPAs and RMAs, as provided in §9VAC25-830-130 and 140 of the Regulations, including the requirement to minimize land disturbance (including access and staging areas), retain existing

vegetation and minimize impervious cover as well as including compliance with the requirements of the *Virginia Erosion and Sediment Control Handbook,* and stormwater management criteria consistent with water quality protection provisions of the *Virginia Stormwater Management Regulations*."

The proposed Davison Army Airfield Area Development Plan would involve approximately 84 acres of land disturbance for the construction of 24 separate development scenarios over the next 30 years, utilizing short-term (up to 10 years), mid-term (11 to 20 years) and long-range (21 to 30 years) phases. Much of the proposed work would require demolition of existing outdated and/or undersized facilities. Based on the preferred Full Implementation Alternative, development over the 30-year project span would result in approximately 23.2 acres of permanent RPA encroachments within the 84 acres and the creation of an additional 36.3 acres of impervious cover. The Davison Army Airfield is bordered to the north and east by Accotink Creek and most (but not all) of the RPA encroachments would occur in these areas. The Coastal Zone Management section of the submitted Federal Consistency Determination documentation (pages 7-8) states that "RPA impacts would be ….offset by management measures to be developed by project proponents in coordination with Fort Belvoir Directorate of Public Works, Environmental Division, as necessary and appropriate." Figures 4.7-3 (RPA Impacts – Full Implementation scenario), 4.7-5 (Floodplain Impacts – FIA) and Figure 4.8-1 (Vegetation Impact) all show extensive impacts to the mapped RPA buffers.

Given the 30-year timeframe, the extensive scope of construction activities referenced in the Area Development Plan (as well as the general nature of the proposed construction activities, with no current site plans for review), and the potential for significant impacts to RPA buffers, review for consistency with the *Chesapeake Bay Preservation Act* and the Regulations should be done on an individual project basis. Ensuring compliance with the general performance criteria referenced above (minimizing land disturbance, preserving indigenous vegetation and minimizing impervious cover), the regulatory requirement that limit land-disturbing activities to water-dependent facilities/uses and redevelopment activities, and the need for site-specific RPA delineations and submittal of Water Quality Impact Assessments (WQIA) makes review of the 24 individual projects necessary, and will require site plan development drawings and other necessary documentation for each project.

As currently proposed, there is insufficient information in the DEIS to determine whether individual projects comply with the *Chesapeake Bay Preservation Act* and the Regulations. Compliance with the Bay Act and Regulations would be determined upon the submission of the information described above for individual projects as they are implemented.

Commonwealth of Virginia

Fisher, John <john.fisher@deq.virginia.gov>

Area Development Plan (ADP) for Davison Army Airfield (DHR 2018-0282/DEQ 20-110F)

1 message

Holma, Marc <marc.holma@dhr.virginia.gov> Thu, Jul 30, 2020 at 9:57 AM
To: John Fisher <john.fisher@deq.virginia.gov>

Dear John,

The DHR received DEQ's request via email to review and comment on the above referenced project. The Army initiated consultation with DHR on this undertaking pursuant to Section 106 of the National Historic Preservation Act, as amended, and its implementing regulation 36 CFR Part 800 in 2018. Since that time, the Army has consulted with DHR for individual projects associated with the Davison Army Airfield Development plan under the same authority. We anticipate the Army to continue such consultation as projects at the Airfield mature beyond the conceptual phase. We request DEQ in its response to the Army to continue consulting with DHR on undertakings occurring at the Davison Airfield.

Sincerely,
Marc

--
Marc Holma
Architectural Historian
Division of Review and Compliance
(804) 482-6090
marc.holma@dhr.virginia.gov

Commonwealth of Virginia

Fisher, John <john.fisher@deq.virginia.gov>

Re: NEW PROJECT Army Davison Army Airfield Area Development Plan, DEQ #20-110F

1 message

Rusty Harrington <rusty.harrington@doav.virginia.gov> Wed, Aug 26, 2020 at 1:52 PM
To: "Fisher, John" <john.fisher@deq.virginia.gov>

No sir.

On Wed, Aug 26, 2020 at 10:24 AM Fisher, John <john.fisher@deq.virginia.gov> wrote:

> Hi Rusty:
>
> Hope you and your family are well. Any comments on this one?
>
> John
>
> John E. Fisher
> Virginia Department of Environmental Quality
> Division of Environmental Enhancement
> Office of Environmental Impact Review
> 1111 East Main Street, Suite 1400
> Richmond, Virginia 23219
> (804) 698-4339
> john.fisher@deq.virginia.gov
>
> For program updates and public notices please subscribe to Constant Contact

Commonwealth of Virginia

Fisher, John <john.fisher@deq.virginia.gov>

ESSLog# 40783_20-110F_DavisonField_DWR_AME20200820

1 message

Ewing, Amy <amy.ewing@dwr.virginia.gov> Thu, Aug 20, 2020 at 3:57 PM
To: John Fisher <john.fisher@deq.virginia.gov>
Cc: Richard Reynolds <rick.reynolds@dwr.virginia.gov>

John,
We have reviewed the subject project that proposes upgrades to Davison Army Field on Ft. Belvoir in Fairfax. We document state Endangered Tri-colored Bats from the project area. To best protect this species from harm associated with tree removal and timbering, we recommend that if such activities are proposed, they adhere to a time of year restriction from April 1 through August 31 of any year.

We also document state Threatened Wood Turtles from the project area. Accotink Creek is located nearby and has been designated a Threatened and Endangered Species Water due to the presence of this species. It does not appear Accotink Creek or its riparian habitats are proposed for impacts. As such, we do not anticipate this project to result in adverse impacts upon Wood Turtles. If instream work in Accotink Creek and/or work within naturally vegetated habitats within 900 ft of Accotink Creek are proposed, we recommend additional coordination with us to ensure protection of Wood Turtles and their habitats.

To minimize overall impacts to wildlife and our natural resources, we offer the following comments about development activities: we recommend that the applicant avoid and minimize impacts to undisturbed forest, wetlands, and streams to the fullest extent practicable.

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.

We recommend that all tree removal and ground clearing adhere to a time of year restriction (TOYR) protective of resident and migratory songbird nesting from March 15 through August 15 of any year.

We recommend adherence to erosion and sediment controls during ground disturbance. To minimize potential wildlife entanglements resulting from use of synthetic/plastic erosion and sediment control matting, we recommend use of matting made from natural/organic materials such as coir fiber, jute, and/or burlap.

Assuming strict adherence to erosion and sediment control standards is maintained, we find this project to be consistent with the Fisheries Management Enforceable Policy of the Virginia Coastal Zone Management Program.

We recommend adherence to the currently approved Integrated Natural Resources Management Plan for Ft. Belvoir.

Thanks, Amy

Amy Martin Ewing
Environmental Services Biologist
Manager, Wildlife Information
P 804.367.2211
Department of Wildlife Resources
CONSERVE. CONNECT. PROTECT.

A 7870 Villa Park Drive, P.O. Box 90778, Henrico, VA 23228
www.VirginiaWildlife.gov

Commonwealth of Virginia

Fisher, John <john.fisher@deq.virginia.gov>

Re: NEW PROJECT Army Davison Army Airfield Area Development Plan, DEQ #20-110F

1 message

Warren, Arlene <arlene.warren@vdh.virginia.gov> Wed, Aug 26, 2020 at 9:55 AM
To: John Fisher <john.fisher@deq.virginia.gov>
Cc: rr Environmental Impact Review <eir@deq.virginia.gov>

Project Name: Davison Army Airfield Area Development Plan
Project #: 20-110 F
UPC #: N/A
Locaon: F airfax Co.

VDH – Office of Drinking Water has reviewed the above project. Below are our comments as they relate to proximity to **public drinking water sources** (groundwater wells, springs and surface water intakes). Potenal impacts t o public water distribuon s ystems or sanitary sewage collecon s ystems **must be verified by the local ulity .**

There are no public groundwater wells within a 1-mile radius of the project site.

The following surface water intakes are located within a 5 mile radius of the project site:

PWS ID Number	System Name	Facility Name
6059501	FAIRFAX CO. WATER AUTHORITY	OCCOQUAN RESERVIOR INTAKE

The project is not within the watershed of any public surface water intakes.

- ***Comments from Environmental Epidemiology, Mr. Dwight Flammia, Ph.D. State Public Health Toxicologist*** were "no comments".
- ***Comments from OEHS Division of Shellfish Sanitaon, Mr . Adam Wood*** were "The Division of Shellfish Safety has no comments to give as this project is well upstream of shellfish waters."
- No comments were received from Radiological Health, Mr. Steven Harrison, Director.
- No comments were received from OEHS Onsite Sewage & Water Services, Mr. Lance Gregory.

Best Management Pracces should be emplo yed, including Erosion & Sedimentaon Con trols and Spill Prevenon Controls & Countermeasures on the project site.

Materials should be managed while on site and during transport to prevent impacts to nearby surface water.

The Virginia Department of Health – Office of Drinking Water appreciates the opportunity to provide comments. If you have any quesons, please le t me know.

Best Regards,

Arlene Fields Warren

GIS Program Support Technician

Office of Drinking Water

Virginia Department of Health

Commonwealth of Virginia

Fisher, John <john.fisher@deq.virginia.gov>

RE: NEW PROJECT Army Davison Army Airfield Area Development Plan, DEQ #20-110F

1 message

Mark Eversole <mark.eversole@mrc.virginia.gov> Fri, Aug 28, 2020 at 10:04 AM
To: "Fisher, John" <john.fisher@deq.virginia.gov>

John, based on a desktop review of the informaon and mapping pr ovided, it appears that no permit will be required from the Marine Resources Commission. The submission of a Joint Permit Applicaon, with mor e detailed drawings and mapping, is the best method of determining the perming r equirement of federal, state, and local environmental agencies.

Thank you for the opportunity to review and provide comments on this project.

Matthew J. Strickler
Secretary of Natural Resources

Clyde E. Cristman
Director

COMMONWEALTH of VIRGINIA
DEPARTMENT OF CONSERVATION AND RECREATION

Rochelle Altholz
Deputy Director of Administration and Finance

Russell W. Baxter
Deputy Director of Dam Safety & Floodplain Management and Soil & Water Conservation

Nathan Burrell
Deputy Director of Government and Community Relations

Thomas L. Smith
Deputy Director of Operations

MEMORANDUM

DATE: August 26, 2020

TO: John Fisher, DEQ

FROM: Roberta Rhur, Environmental Impact Review Coordinator

SUBJECT: DEQ 20-110F, Davison Army Airfield Area Development Plan

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.

According to the information currently in our files, the Accotink Bay – Gunston Cove Stream Conservation Unit is located downstream of the project site. Stream Conservation Units (SCUs) identify stream reaches that contain aquatic natural heritage resources, including 2 miles upstream and 1 mile downstream of documented occurrences, and all tributaries within this reach. SCUs are also given a biodiversity significance ranking based on the rarity, quality, and number of element occurrences they contain. The Accotink Bay – Gunston Cove SCU has been given a biodiversity ranking of B5, which represents a site of general significance. The natural heritage resources associated with this site are:

Lampsilis radiate	Eastern lampmussel	G5/S2S3/NL/NL
Glyptemys insculpta	Wood turtle	G3/S2/NL/LT

The Eastern lampmussel is a freshwater mussel which inhabits river systems in areas with substrates composed of silt, sand, cobble, gravel and exposed bedrock (NatureServe, 2009). This species has a wide range, from eastern Canada west to Ontario and Quebec and south to South Carolina (NatureServe, 2009). In Virginia, there are records from the Chowan and York River drainages.

Considered good indicators of the health of aquatic ecosystems, freshwater mussels are dependent on good water quality, good physical habitat conditions, and an environment that will support populations of host fish species (Williams et al., 1993). Because mussels are sedentary organisms, they are sensitive to water quality degradation related to increased sedimentation and pollution. They are also sensitive to habitat destruction through dam construction, channelization, and dredging, and the invasion of exotic mollusk species.

The Wood turtle ranges from southeastern Canada, south to the Great Lake states and New England. In Virginia, it is known from northern counties within the Potomac River drainage (NatureServe, 2009). The Wood turtle inhabits areas with clear streams with adjacent forested floodplains and nearby fields, wet meadows, and farmlands (Buhlmann et al., 2008; Mitchell, 1994). Since this species overwinters on the bottoms of creeks and streams, a primary habitat requirement is the presence of water (Mitchell, 1994).

Threats to the wood turtle include habitat fragmentation, urbanization, and automobile or farm machinery mortality (Buhlmann et al., 2008). Please note that the Wood turtle is currently classified as threatened by the Virginia Department of Wildlife Resources (VDWR).

Furthermore, the Accotink Wetlands Conservation Site is located downstream of the project site. Conservation sites are tools for representing key areas of the landscape that warrant further review for possible conservation action because of the natural heritage resources and habitat they support. Conservation sites are polygons built around one or more rare plant, animal, or natural community designed to include the element and, where possible, its associated habitat, and buffer or other adjacent land thought necessary for the element's conservation. Conservation sites are given a biodiversity significance ranking based on the rarity, quality, and number of element occurrences they contain; on a scale of 1-5, 1 being most significant. Accotink Wetlands Conservation Site has been given a biodiversity significance ranking of B3, which represents a site of high significance. The natural heritage resources of concern at this site are:

Lathyrus palustris	Marsh pea	G5/S1/NL/NL
Bolboschoenus fluviatilis	River bulrush	G5/S2/NL/NL
Ranunculus ambigens	Water-plantain crowfoot	G4/S1/NL/NL
Carex vestita	Velvet sedge	G5/S2/NL/NL
Tidal Freshwater Marsh (Mixed High Marsh Type)		G3/S4?/NL/NL
Coastal Plain / Outer Piedmont Acidic Seepage Swamp		G3?/S3/NL/NL
Northern Coastal Plain / Piedmont Mesic Mixed Hardwood Forest		G5/S5/NL/NL

To minimize adverse impacts to the aquatic ecosystems as a result of the proposed activities, DCR supports the implementation of and strict adherence to applicable state and local erosion and sediment control/storm water management laws and regulations as stated on page 6-2 of the Draft Environmental Impact Statement (DEIS). DCR supports excluding development within the Fort Belvoir Forest and Wildlife Corridor (FWC) as stated on page 3-81 of the DEIS and the implementation of a time-of-year restriction for tree clearing to minimize adverse impacts to bat species as stated on page 6-3. Due to the legal status of state and federally listed species documented near the project area as shown in Table 3.8-3 of the DEIS, DCR recommends continued coordination with the US Fish and Wildlife Service (USFWS) and Virginia's regulatory authority for the management and protection of these species, the VDWR, to ensure compliance with protected species legislation.

There are no 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 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 re-submit project information and map for an update on this natural heritage information if the scope of the project changes and/or six months has passed before it is utilized.

The Virginia Department of Wildlife Resources (VDWR) 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 https://vafwis.dgif.virginia.gov/fwis/ or contact Ernie Aschenbach at 804-367-2733 or Ernie.Aschenbach@dwr.virginia.gov.

Division of Dam Safety and Floodplain Management

Floodplain Management Program:
The National Flood Insurance Program (NFIP) is administered by the Federal Emergency Management Agency (FEMA), and communities who elect to participate in this voluntary program manage and enforce the program on the local level through that community's local floodplain ordinance. Each local floodplain ordinance must comply with the minimum standards of the NFIP, outlined in 44 CFR 60.3; however, local communities may adopt more restrictive requirements in their local floodplain ordinance, such as regulating the 0.2% annual chance flood zone (Shaded X Zone).

All development within a Special Flood Hazard Area (SFHA), as shown on the locality's Flood Insurance Rate Map (FIRM), must be permitted and comply with the requirements of the local floodplain ordinance.

State Agency Projects Only
Executive Order 45, signed by Governor Northam and effective on November 15, 2019, establishes mandatory standards for development of state-owned properties in Flood-Prone Areas, which include Special Flood Hazard Areas, Shaded X Zones, and the Sea Level Rise Inundation Area. These standards shall apply to all state agencies.

1. Development in Special Flood Hazard Areas and Shaded X Zones
    A. All development, including buildings, on state-owned property shall comply with the locally-adopted floodplain management ordinance of the community in which the state-owned property is located and any flood-related standards identified in the Virginia Uniform Statewide Building Code.
    B. If any state-owned property is located in a community that does not participate in the NFIP, all development, including buildings, on such state-owned property shall comply with the NFIP requirements as defined in 44 CFR §§ 60.3, 60.4, and 60.5 and any flood-related standards identified in the Virginia Uniform Statewide Building Code.
        (1) These projects shall be submitted to the Department of General Services (DGS), for review and approval.
        (2) DGS shall not approve any project until the State NFIP Coordinator has reviewed and approved the application for NFIP compliance.
        (3) DGS shall provide a written determination on project requests to the applicant and the State NFIP Coordinator. The State NFIP Coordinator shall maintain all documentation associated with the project in perpetuity.
    C. No new state-owned buildings, or buildings constructed on state-owned property, shall be constructed, reconstructed, purchased, or acquired by the Commonwealth within a Special

Flood Hazard Area or Shaded X Zone in any community unless a variance is granted by the Director of DGS, as outlined in this Order.

The following definitions are from Executive Order 45:

Development for NFIP purposes is defined in 44 CFR § 59.1 as "Any man-made change to improved or unimproved real estate, including but not limited to buildings or other structures, mining, dredging, filling, grading, paving, excavation or drilling operations or storage of equipment or materials."

The Special Flood Hazard Area may also be referred to as the 1% annual chance floodplain or the 100-year floodplain, as identified on the effective Flood Insurance Rate Map and Flood Insurance Study. This includes the following flood zones: A, AO, AH, AE, A99, AR, AR/AE, AR/AO, AR/AH, AR/A, VO, VE, or V.

The Shaded X Zone may also be referred to as the 0.2% annual chance floodplain or the 500- year floodplain, as identified on the effective Flood Insurance Rate Map and Flood Insurance Study.

The Sea Level Rise Inundation Area referenced in this Order shall be mapped based on the National Oceanic and Atmospheric Administration Intermediate-High scenario curve for 2100, last updated in 2017, and is intended to denote the maximum inland boundary of anticipated sea level rise.

"State agency" shall mean all entities in the executive branch, including agencies, offices, authorities, commissions, departments, and all institutions of higher education.

"Reconstructed" means a building that has been substantially damaged or substantially improved, as defined by the NFIP and the Virginia Uniform Statewide Building Code.

Federal Agency Projects Only

Projects conducted by federal agencies within the SFHA must comply with federal Executive Order 11988: Floodplain Management.

DCR's Floodplain Management Program does not have regulatory authority for projects in the SFHA. The applicant/developer must reach out to the local floodplain administrator for an official floodplain determination and comply with the community's local floodplain ordinance, including receiving a local permit. Failure to comply with the local floodplain ordinance could result in enforcement action from the locality. For state projects, DCR recommends that compliance documentation be provided prior to the project being funded. For federal projects, the applicant/developer is encouraged reach out to the local floodplain administrator and comply with the community's local floodplain ordinance.

To find flood zone information, use the Virginia Flood Risk Information System (VFRIS): www.dcr.virginia.gov/vfris

To find community NFIP participation and local floodplain administrator contact information, use DCR's Local Floodplain Management Directory: www.dcr.virginia.gov/dam-safety-and-floodplains/floodplain-directory

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

CC: Amy Ewing, VDWR

DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF AIR PROGRAM COORDINATION

ENVIRONMENTAL REVIEW COMMENTS APPLICABLE TO AIR QUALITY

TO: John Fisher

We thank **OEIR** for providing DEQ-AIR an opportunity to review the following project:

Document Type: Draft Environmental Impact Statement/Federal Consistency Determination
Project Sponsor: DOD/Department of the Army
Project Title: Davison Army Airfield Area Development Plan
Location: Fairfax County
Project Number: DEQ #20-110F

Accordingly, I am providing following comments for consideration.

PROJECT LOCATION: **X OZONE NON ATTAINMENT AND EMISSION CONTROL AREA FOR NOX & VOC**

REGULATORY REQUIREMENTSMAY BE APPLICABLE TO: **X 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 5-45-760 et seq. – Asphalt Paving operations
3. **X** **9 VAC 5-130 et seq. – Open Burning**
4. **X** **9 VAC 5-50-60 et seq. Fugitive Dust Emissions**
5. ☐ 9 VAC 5-50-130 et seq. - Odorous Emissions; Applicable to_____
6. ☐ 9 VAC 5-60-300 et seq. – Standards of Performance for Toxic Pollutants
7. ☐ 9 VAC 5-50-400 Subpart____, Standards of Performance for New Stationary Sources, designates standards of performance for the_____
8. ☐ 9 VAC 5-80-1100 et seq. of the regulations – Permits for Stationary Sources
9. ☐ 9 VAC 5-80-1605 et seq. Of the regulations – Major or Modified Sources located in PSD areas. This rule may be applicable to the _____
10. ☐ 9 VAC 5-80-2000 et seq. of the regulations – New and modified sources located in non-attainment areas
11. ☐ 9 VAC 5-80-800 et seq. Of the regulations – State Operating Permits. This rule may be applicable to _____

COMMENTS SPECIFIC TO THE PROJECT:

All precautions are necessary to restrict the emissions of volatile organic compounds (VOC) and oxides of nitrogen (NO_x) where construction activity is involved.



(Kotur S. Narasimhan)
Office of Air Data Analysis **DATE: July 30, 2020**

Carver, Craig

From: FortBelvoirNOI <FortBelvoirNOI@usace.army.mil>
Sent: Thursday, August 27, 2020 11:55 AM
To: Carver, Craig
Subject: [EXTERNAL] FW: [Non-DoD Source] Draft EIS - Davison Army Airfield, Fort Belvoir, VA - Public Meeting & Public

Categories: Yellow Category

FYI please include in the matrix.
Heather

-----Original Message-----
From: Warren, Arlene [redacted]
Sent: Wednesday, August 26, 2020 10:04 AM
To: FortBelvoirNOI <FortBelvoirNOI@usace.army.mil>
Subject: [Non-DoD Source] Draft EIS - Davison Army Airfield, Fort Belvoir, VA - Public Meeting & Public

Project Name: Draft EIS - Davison Army Airfield

Project #: N/A

UPC #: N/A

Location: Fairfax Co.

VDH – Office of Drinking Water has reviewed the above project. Below are our comments as they relate to proximity to public drinking water sources (groundwater wells, springs and surface water intakes). Potential impacts to public water distribution systems or sanitary sewage collection systems must be verified by the local utility.

There are no public groundwater wells within a 1-mile radius of the project site.

The following surface water intakes are located within a 5 mile radius of the project site:

PWS ID Number

System Name

Facility Name

6059501

FAIRFAX CO. WATER AUTHORITY

OCCOQUAN RESERVIOR INTAKE

The project is not within the watershed of any public surface water intakes.

* Comments from Environmental Epidemiology, Mr. Dwight Flammia, Ph.D. State Public Health Toxicologist were “no comments”.

* Comments from OEHS Division of Shellfish Sanitation, Mr. Adam Wood were “The Division of Shellfish Safety has no comments to give as this project is well upstream of shellfish waters.”

* No comments were received from Radiological Health, Mr. Steven Harrison, Director.

* No comments were received from OEHS Onsite Sewage & Water Services, Mr. Lance Gregory.

Best Management Practices should be employed, including Erosion & Sedimentation Controls and Spill Prevention Controls & Countermeasures on the project site.

Materials should be managed while on site and during transport to prevent impacts to nearby surface water.

The Virginia Department of Health – Office of Drinking Water appreciates the opportunity to provide comments. If you have any questions, please let me know.

Best Regards,

Arlene Fields Warren

GIS Program Support Technician

Office of Drinking Water

Virginia Department of Health

109 Governor Street

Carver, Craig

From: Dabestani, Cina [redacted]
Sent: Monday, August 17, 2020 9:30 AM
To: Carver, Craig
Cc: Trivedi, Rahul
Subject: [EXTERNAL] Re: Draft EIS - Davison Army Airfield, Fort Belvoir, VA

Craig-

Thank you for the opportunity to share comments/concerns on the subject project. After careful review of the subject project's documents, VDOT-NoVa has no comments to offer at this time.

Should you have any questions on this response, please feel free to contact me directly.

On Thu, Jul 30, 2020 at 10:09 AM Carver, Craig [redacted] wrote:

> Hi Cina,
>
> -
>
> The Draft EIS and public meeting materials are available on Fort Belvoir's website at the following link:
>
> -
>
> https://home.army.mil/belvoir/index.php/about/Garrison/directorate-public-works/environmental-division
>
> -
>
> Once you go to that link, click on the "Programs and Documents" tab and then "National Environmental Policy Act (NEPA) Program", and the DAAF Draft EIS documents will be listed here.
>
> -
>
> I've also attached the public meeting poster and fact sheet files for your review, if your are still unable to access them on the website.
>
> -
>
> Please let us know if there's anything else. Thanks,
>
> -
>
> -
>
> **Craig Carver**, AICP
> Environmental Compliance Specialist
>
> Southeast
> [redacted]

September 4, 2020

John E. Fisher
Virginia Department of Environmental Quality
Division of Environmental Enhancement
Office of Environmental Impact Review
1111 East Main Street, Suite 1400
Richmond, Virginia 23219

RE: DEQ #20-110F, Draft Environmental Impact Statement and Federal Consistency Determination for Davison Army Airfield Area Development Plan

Dear Mr. Fisher:

Thank you for the opportunity to comment on the draft Environmental Impact Statement (EIS) and Federal Consistency Determination pursuant to the proposed Master Plan at the Davison Army Airfield (DAAF) Development Plan. It is our understanding from the Army's submission that this 673-acre site has a future need to expand infrastructure to meet current and future missions. This master plan includes 24 projects that may be funded over the next 20+years. These projects include a variety of activities, such as transportation improvements, utility upgrades, new building construction/renovation, and additional parking facilities.

In collaboration with the Department of Public Works and Environmental Services (DPWES), the Fairfax County Department of Transportation (FCDOT) and the Fairfax County Park Authority (FCPA), the Department of Planning and Development (DPD) has prepared the attached environmental conditional map (attached) for the proposed field development and offers the following comments:

<u>Ecological Resources – General</u>

1. We commend Fort Belvoir for its environmental stewardship and recommend that the current planning effort reinforce and expand upon these efforts whenever possible. The extent of preservation efforts on the post and the continued presence of large areas of ecologically valuable land attest to the environmental sensitivity and the seriousness with which Fort Belvoir has pursued its guiding principle to "support the natural habitat." Fairfax County commends and fully supports these environmental initiatives.

2. Fairfax County recognizes that the Department of the Army is not subject to the provisions of the Fairfax County stormwater management and Chesapeake Bay Preservation Ordinance (CBPO). However, Fairfax County continues to encourage the

Army to meet the CBPO as described in Chapter 118 of the County Code, including conformance with the requirements for areas designated as Resource Protection Areas (RPAs) and Resource Management Areas. Environmental Quality Corridors (EQCs) as defined in Policy Plan Element of Fairfax County's Comprehensive Plan should also be considered.

3. DPWES Stormwater requests that the Army follow the floodplain management requirements contained in Fairfax County Zoning Ordinance, Article 2, Part 9, Floodplain Regulations and notify the county of any floodplain changes that might impact Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps.

4. Under the full implementation alternative, 7.5 acres of floodplain would be permanently lost through filling and 31 acres would be temporarily impacted. DPWES Stormwater requests that temporarily impacted floodplain areas be restored to a good forested condition to maximize their water quality and ecosystem service potential. DAAF development plans should include restoration, monitoring and management plans for the floodplain areas to be restored. On Appendix F, page 4 of the DAAF Area Development Plan Draft Environmental Impact Statement (Draft EIS), it states that restoration planting densities for floodplains and resource protection areas will follow the recommendations in the Virginia Department of Conservation and Recreation Riparian Buffers Modification and Mitigation Guidance Manual (2006). We ask that instead the restoration planting densities for floodplains and RPAs follow the requirements found within the Fairfax County Chesapeake Bay Ordinance (Fairfax County Code Chapter 118) and Chapter 12, Tree Conservation of the Fairfax County Public Facilities Manual.

5. The development will add a significant amount of impervious surface to the site. With a greater area of impervious surface, more runoff and pollutants reach the stream. This section of Accotink Creek has chloride and sediment Total Maximum Daily Loads (TMDLs). Higher levels of runoff from increased imperviousness accelerate stream channel erosion causing increased sedimentation. Deicing salt applied to roads, aircraft runways and taxi areas and parking lots is the primary source of chloride in streams. In addition, deicing compounds applied to aircraft should be addressed to ensure that these actions do not negatively impact surface waters. DPWES Stormwater asks that the area development plan improvements provide stormwater quality and quantity controls above the minimum requirements to minimize impacts to Accotink Creek and, at a minimum, meet the water quantity detention requirements in Chapter 124 of the Fairfax County Code.

6. As noted in the draft Environmental Impact Statement (EIS), the short and long range improvements in the DAAF area development plan will have significant impacts on wetlands and Accotink Creek. DPWES Stormwater supports on-site stream and wetland mitigation within Fort Belvoir rather than payment of an in-lieu fee or purchase of mitigation bank credits outside of the Accotink Creek watershed. For example, on-site mitigation could include restoration of the mainstem of Accotink Creek adjacent to

DAAF and upstream of US Route 1 to reconnect that stream to its floodplain, maximize floodplain storage, improve water quality by decreasing sediment and nutrient loads being transported downstream to the tidal portion of the creek and the Potomac River and improve wildlife habitat.

7. DPWES Stormwater welcomes opportunities to coordinate and partner on Resource Protection Area (RPA) replanting and stream restoration opportunities that may help achieve mutual Chesapeake Bay TMDL goals and local Accotink Creek TMDL objectives.

8. At a minimum, Fort Belvoir should consider incorporating erosion and sediment control measures, stormwater management measures, and water quality best management practices that are consistent with county requirements. Future analyses are encouraged to clearly establish that these requirements will be addressed. In addition, we encourage Fort Belvoir to establish stormwater management performance levels that will support policy, legislative and/or regulatory efforts that are under way (e.g., development of Total Maximum Daily Loads for local bodies of water as well as the Chesapeake Bay; new stormwater management regulations).

9. The EIS should consider incorporating opportunities to preserve and maintain natural communities and ecosystem services at Fort Belvoir, including:
    - Guidelines and controls for land disturbing activities to include maintenance and training to prevent damage to natural resources.
    - A prohibition against the use of any non-native invasive plant species in plantings on post and a non-native invasive species inventory and control program.

10. Fairfax County's Urban Forest Management Division (UFMD) will have specific comments based on the impacts of individual projects as they come forward. It should be noted that the Environmental section of the Policy Plan includes an Objective 10 on page 18 regarding the conservation and restoration of tree cover, which can be found here: https://www.fairfaxcounty.gov/planning-development/sites/planning-development/files/assets/compplan/policy/environment.pdf

In consideration of the recommendations noted above, staff concurs that the proposed DAAF development plan would be consistent to the maximum extent practicable with the enforceable policies of the federally approved Virginia CZM Program, pursuant to the Coastal Zone Management Act of 1972 (16 USC 1456(c)), as amended, and in accordance with 15 CFR Part 930.

Infrastructure Capacity

1. For future analyses, the scope should address the capacities of sewer and water facilities as they relate to the levels of development that would be associated with each development alternative.

Landscaping

1. We commend Fort Belvoir on the quality of its current design elements and recommend that Fort Belvoir continue to incorporate high quality landscape, including native plant species and architectural design elements in its Master Plan.

Archaeological Resources/Heritage Resources

1. Staff agrees with the assessment that the proposed modifications at DAAF will minimally impact the nearby county designated historic properties, due to existing landscaping and topography and the confirmation that the tallest building will not exceed 55 feet. However, the proposed Area of Potential Effects (APE) intersects with two county designated historic overlay districts, Pohick Church and Mt. Air. Therefore, the Fairfax County Architectural Review Board (who oversees historic overlay districts) should be considered a separate consulting party from county planning heritage resources staff. Laura B. Arseneau, the Branch Chief of the Heritage Resources and Plan Development Branch can be reached at 703-324-1380 or Laura.arseneau@fairfaxcounty.gov.

Thank you again for the opportunity to comment on this proposal. If you have any questions about the comments, please contact Katie Hermann with the Department of Planning and Development at Katherine.Hermann@fairfaxcounty.gov.

Sincerely,

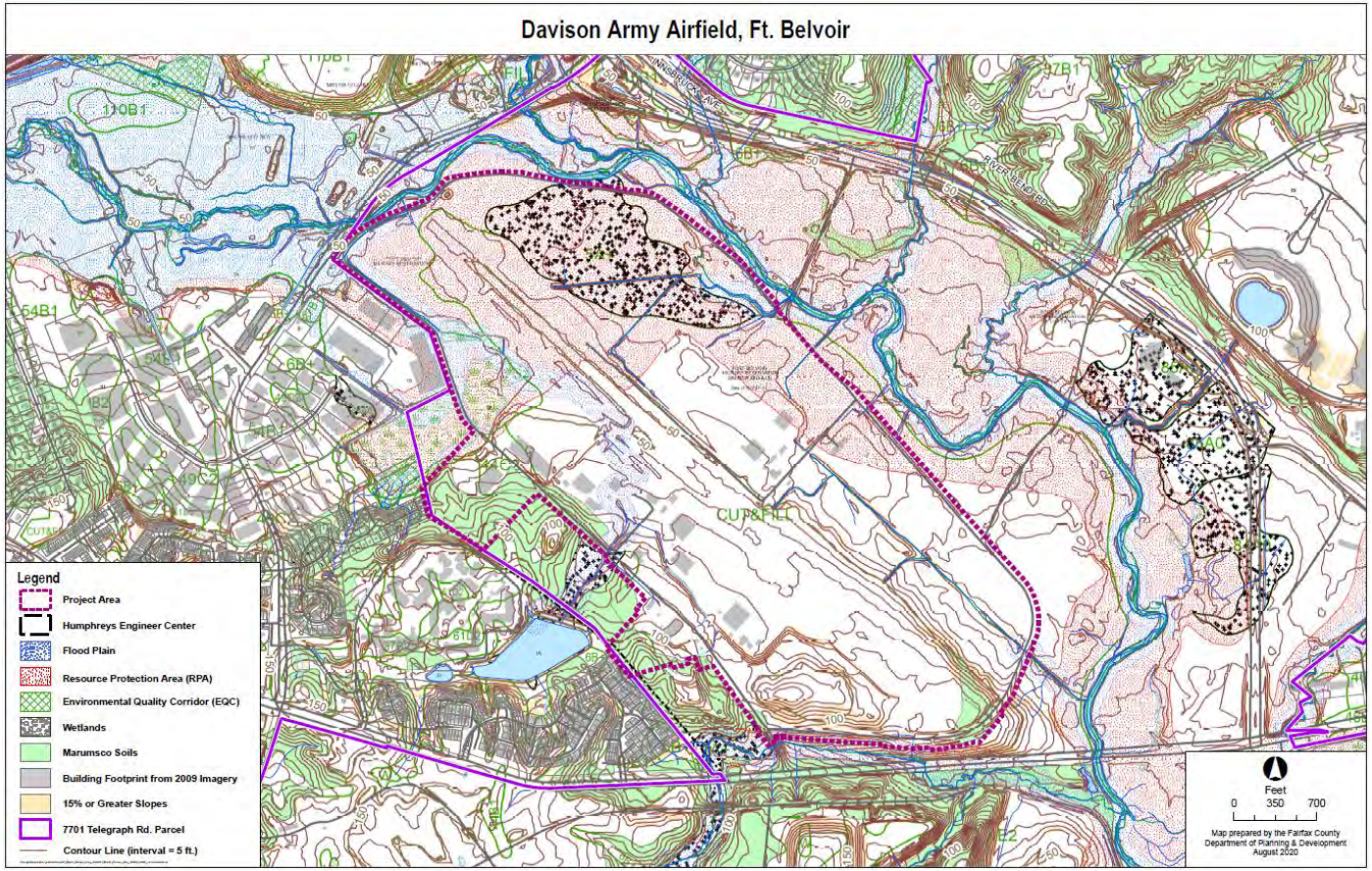
Leanna H O'Donnell

Leanna H. O'Donnell, Director, Planning Division
Department of Planning and Development

LHO: KHH

cc:
Board of Supervisors
Bryan J. Hill, County Executive
Rachel O'Dwyer Flynn, Deputy County Executive
Barbara Byron, Director, DPD
Denise James, Chief, Environment and Development Review, DPD
Michael Garcia, Chief, Transportation Planning, FCDOT
Catherine Torgersen, Planner IV, DPWES
Andrea Dorlester, Planner IV, FCPA
Brian Keightley, Director, UFMD
Christine Morin, Chief of Staff, Mount Vernon District BOS

Attachment: Environmental Map



Carver, Craig

From: Speer, Camela [redacted]
Sent: Monday, July 27, 2020 12:44 PM
To: Carver, Craig
Subject: [EXTERNAL] FW: Draft EIS - Davison Army Airfield, Fort Belvoir, VA - Notice of Availability and 45-day public comment period
Attachments: DAAF ADP DEIS_NOA Legal Notice_FINAL_July 2020.pdf

Hello Craig,

Just checking. If I am looking at the correct page on the Ft Belvoir website, this email says the public information meetings are August 24 and the website says Aug 11. Am I looking at two different sets of meetings, or is one incorrect? https://home.army.mil/belvoir/index.php/about/Garrison/directorate-public-works/environmental-division

HOW TO COMMENT

Teleconferences
Two public teleconferences will be held on August 11, 2020.
To join, call 1-877-286-5733 and enter the passcode when prompted.
Teleconference 1: 1:00 PM – 3:00 PM; Passcode 676-543-300#
Teleconference 2: 6:00 PM – 8:00 PM; Passcode 668-662-26#

Online or U.S. Mail
Email: FortBelvoirNOI@usace.army.mil

Write: US Army Fort Belvoir Directorate of Public Works
Attn.: DAAF Draft EIS
Environmental Division, Chief
9430 Jackson Loop, Building 1442, Rm #230
Fort Belvoir, VA 22060-5116



Notice of Availability - DAAF ADP Draft EIS

Draft EIS Executive Summary - DAAF ADP

Draft EIS Vol. I (No Appendices) - DAAF ADP

Draft EIS Vol. II (Appendices) - DAAF ADP

Draft Finding of No Practicable Alternative (FNPA) - DAAF ADP

THANKS!
Camela

From: Mt. Vernon District BOS <Mt.VernonDistrictBOS@fairfaxcounty.gov>
Sent: Friday, July 24, 2020 9:40 AM
To: Rinehart, Nicholas [redacted] Speer, Camela [redacted]
Morin, Christine A [redacted]
Subject: FW: Draft EIS - Davison Army Airfield, Fort Belvoir, VA - Notice of Availability and 45-day public comment period

FYI

Non-Governmental and Other Organization Comments

Davison Army Airfield
Area Development Plan
Draft Environmental Impact Statement (EIS)

Comment Form

Comments will be addressed in the Final EIS and become part of the public record.
Personally identifiable information will not be published.

The Draft EIS is available online at:
https://home.army.mil/belvoir/index.php/about/Garrison/directorate-public-works/environmental-division

Send this form as an email attachment to: FortBelvoirNOI@usace.army.mil

Print and mail this form to:

US Army Fort Belvoir Directorate of Public Works
Attn.: DAAF Draft EIS
Environmental Division, Chief
9430 Jackson Loop, Building 1442, Rm #230
Fort Belvoir, VA 22060-5116

Comments must be sent by September 8, 2020

1. Please provide your information in the boxes below. *Providing this information is optional*.

Name:	David Lincoln
Title:	Secondary Conservator
Agency / Organization:	Friends of Accotink Creek
Street Address:	7718 Shootingstar Drive
City, State, ZIP:	Springfield VA 22152
Email Address:	Lincdave01@gmail.com

2. Would you like to be notified when the Final EIS is published (enter YES or NO): YES

   If YES, please make sure to provide a mailing address or email address above.

3. Please type your comments in the box below. The box will automatically continue onto the next page if additional space is necessary. *If printing and filling in this form by hand, please continue comments on the back or on a separate sheet of paper.*



As Friends of Accotink Creek, our concerns with the DAAF Proposed Action are threefold: The impact on sedimentary load on the Accotink brought on by increased impervious surface and planned loss of riparian habitat; the loss of carbon sequestration that will result from destroying plant life and leaf count, on DAAF property; and the increase of pollution from winter storm treatment of DAAF's buildings runways, streets and sidewalks described in Projects 5-15 and 18-24.

We are fully cognizant that, as pointed out in the Draft EIS, the vast majority of impervious surfaces that impair the Accotink are upstream of DAAF, but please note that our local jurisdictions are currently spending tens and hundreds of millions to correct that unfortunate fact by mitigating decades of paving with limited or nonexistent stormwater controls. As the DAAF Proposed Action proceeds, the DAAF, bordering about 2.3 miles of the Accotink, has an opportunity to set a high standard for environmental stewardship in our shared watershed as it contracts for projects that will retrofit and expand facilities. We note with pleasure the citation in the Draft EIS of the Army's EO 11990, Protection of Wetlands, that ". . . requires that federal agencies provide leadership and take actions to minimize or avoid the destruction, loss, or degradation of wetlands and to preserve and enhance the natural and beneficial values of wetlands." Along the lines of that ambitious policy, we ask that the Army go above and beyond the minimum effort to meet its environmental obligations as dutifully addressed in the Draft EIS, and to not limit its application to the formally defined wetlands of DAAF, by realizing that the entire DAAF, apparently the only industrial area in the bottomlands of the lower Accotink, has little to no buffer space in which to mitigate damaging runoff.

As the Army proceeds with the DAAF Proposed Action, the Friends of Accotink Creek will encourage all interested parties to join us in supporting positive initiatives, and we look forward to observing and participating as an advocate for the Accotink Creek watershed.

The Draft EIS notes among the monitoring benchmarks for the Accotink, the 2017 DEQ TMDL report, which resulted from the creek's impaired state. Volume II focuses on the sedimentation issue and Volume III focuses on the chloride pollution, a seasonally varying problem due to winter storm treatments on impervious surfaces. We are quite familiar with the Accotink TMDL and ensuing follow-on activities, and will refer to them in the comments that follow.

Regarding sedimentation impacts on the Accotink, we ask the Army to be more forthright and specific about BMPs that contractors will be required to use in projects of the Proposed Action. As described in Table ES-2: Summary of Impacts from the Proposed Action, full implementation will have these effects on "Water Resources: Disturb 3.6 acres of the officially designated wetlands and 2026 feet of the streams in DAAF; eliminate 23 acres of RPAs; and develop 7.5 acres of the officially designated flood plain. As noted, the ". . .Full Alternative would contribute significant adverse cumulative effects on wetlands and streams. . . " In response, the Army simply proposes in Section 6.2.1 that mitigation will be limited to three 'compensatory' alternatives: The restoration of wetlands and streams elsewhere on Fort Belvoir or the surrounding area; the payment of in-lieu fees to an approved restoration program; or the purchase of credits from an approved mitigation bank.

Noting that Fort Belvoir's 52 other projects cited in Table 5.4-1 include many increases in impervious surfaces that will affect other watersheds, our impression is that the first compensatory alternative listed is a dead end.

Rather than looking outside DAAF property for compensatory mitigation, we ask that the Army take advantage of this rare opportunity to make up for past construction in DAAF since the 1950's, doubtlessly with inadequate stormwater controls, by finding imaginative ways to provide the best of stormwater controls above and beyond the legally required minimums. For example, he BMPs for storm water management cited in the Accotink TMDL Volume II have corresponding efficiency measures from actual projects. Examples may include installing nearby green roofs, pervious parking lots, infiltration cisterns, rain gardens.

In addition, where mitigation of the impact on the Accotink within Fort Belvoir is not available, we ask the Army to cooperate with Fairfax County to find fundable shovel-ready projects that will improve

Accotink Creek's health upstream of DAAF, rather than deferring to unrelated projects that theoretically will improve other streams.
In some areas of the Draft EIS, wording is vague as to whether or not native species will be used for replanting disturbed areas of the Accotink watershed. We ask that the policy for the Proposed Action be clear that the Army requires that there will be no tolerance for invasive species in seed mix or plantings during and after construction, and that plantings will be with species native to this region of Virginia, allowing regrowth in harmony with surrounding habitats and native wildlife that will also help minimize upkeep and mowing expense.

Regarding impact on carbon sequestration resulting from removing vegetation for the Proposed Action, we note the replacement policy described in Section 6.2.2.2 Biological Resources. However, we request that the Army employ the principle that leaf area is a better measure for the net carbon dioxide removal than just tree cover. Leaf area is also a better measure for water uptake and cooling effects in the immediate environment, and it allows the Army the flexibility of going with green walls and roofs which may be more palatable than efforts to replant the surface with multiple canopies in order to offset the increased impervious surface.

Finally, regarding chlorides, we request that DAAF leadership consider and even surpass the recommendations that will result from the Accotink TMDL Volume III, Chlorides, in order to minimize impairment despite the increased area of paved surfaces that will need treatment in winter storms. The BMPs that have been worked out with public, private, and advocacy representatives in the Salt Management Strategies Stakeholder Advisory Committee (SAMS SAC) will be published within a few months, and they will include proven, cost-effective methods to monitor and reduce use of salt and other chlorides for winter storm treatment, without detriment to the safety of the users of paved surfaces. We believe DAAF can be a leader for reducing chloride pollution, surpassing Fort Belvoir's obligations under its MS4, VAR040093. We also recommend benchmarking VDOT and local jurisdictions for cost - effective BMPs for salt management through monitoring and minimization based on conditions.

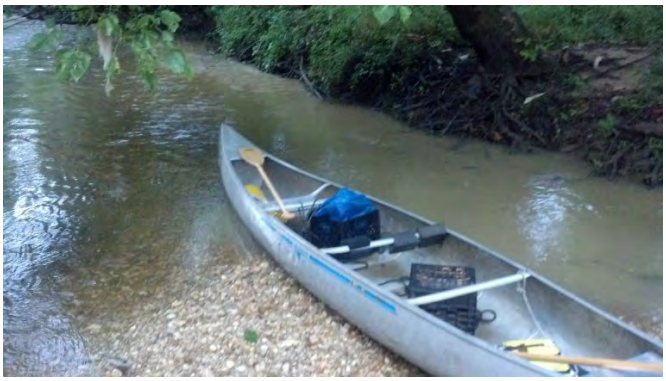

Fig. 1. Accotink Sediment from Route 1 Widening


Fig. 2. Accotink erosion near Anderson Park

Our comments are informed by our experience monitoring and responding to various public projects that directly impacted the Accotink's health. For instance, during VDOT's 495/HOT expansion, where the Friends of Accotink Creek documented and reported hundreds of construction-related sediment pollution events, including incidents where heavily sediment-contaminated water was being pumped directly into Accotink Creek and her tributaries. The Virginia Department of Conservation and Recreation issued a stop-work order, and the Friends of Accotink Creek partnered with the Potomac Riverkeeper on a lawsuit under the Clean Water Act, which was preempted by state action, resulting in a Consent Decree (Documentation is at http://www.accotink.org/HOT.html .
Closer to DAAF, we noted in 2017 the excessive sedimentary runoff into Accotink Creek from the Route 1 widening just downstream from DAAF, as recorded in Figure 1, contrary to VDOT's obligations to limit water resource impact. We look forward to the Army's success in preventing such runoff during the DAAF modernization. Similarly, we have noted the extreme erosion of the Accotink banks Near Fort Belvoir's Anderson Park (to be partially paved over by Project 6), as recorded in Figure 2), and we hope the DAAF modernization will actually reduce such erosion with aggressive application of BMPs for storm water management.

Sincerely yours,
Friends of Accotink Creek : : www.accotink.org :
><((((º>`·.¸¸.·´¯`·.¸><((((º> *“Find just one other person who cares.”* ><((((º>`·.¸¸.·´¯`·.¸><((((º>

Thank you for your comments on the Draft EIS!

NewingtonVA.org
P.O. Box 1214, Newington, VA 22122
703-541-2000
www.newingtonva.org
newington.virginia@gmail.com

September 8, 2020

Fort Belvoir Directorate of Public Works
Environmental Division (DPW–ED)
Jackson Loop, Suite 200
Fort Belvoir, Virginia 22060–5116

RE: Comments on Davison Airfield draft EIS / DAAF ADP EIS 9430

Submitted via email to: usarmy.belvoir.imcom-atlantic.mbx.enrd@mail.mil

Dear Garrison Commander,

Our organization acts as an community umbrella group to foster the improvement of the Newington area of Fairfax County. Specific to this matter, we seek to act as a coordinated voice for the nine neighborhoods that comprise the residential component of Newington, directly north and adjacent to the Davision Airfield. A map of the area we operate within is shown at our website www.newingtonva.org and as one of the most affected neighbors and stakeholders in operations at Davison Airfield, our organization would like to comment on above referenced EIS.

As presented, the EIS describes the proposed activities over the next 30 years as basic modernization and renovation of facilities that the U.S. Army depends on to execute its mission in the area – particularly in the area of rotorcraft operations. Relative to that element of the EIS, our organization concurs with the need for modernization and basic renovation to maintain a safe, technologically advanced, efficient operation at Davison. As evidence of our organization's support of the missions at Davison, NewingtonVA.org supported the recent improvement of the control tower.

However, to support the continued operations of Davison through the 30 year study period, we would like to draw your attention to a number of operations that are not described in the EIS, of which the noise levels are are currently problematic for our neighborhoods to the north of the airfield. These problems are:

- Practice flights, in general, for all military aircraft over residential areas in our community
- The use of Davison Airfield for practice flights by U.S. Air Force UH-1 helicopters
- Practice activities, including extended hovering, at DAA helipad adjacent to residential homes
- Takeoffs and landings of military rotorcraft in violation of published NOTAM flight rules
- Lack of a published helicopter route map in the Interstate 95 corridor south of the 495 Beltway

Noise levels (peak) in excess of 65 dB(A) occurring within residential communities that are created by DAA rotorcraft operations are not satisfactorily studied by this EIS, however such study is appropriate if off-base operations such as helicopter training are proposed to continue. Our comments on the following pages provide additional detail for each of these five main areas of concern. It is our hope that the EIS can be amended to comply with NEPA in the key areas that follow.

Practice flights, in general, for all military aircraft over residential areas in our community

Our organization has noticed, in reading numerous documents published by the Army regarding the operations and use of Davison Airfield, that the Army does not typically assess, analyze, or measure the amount of practice (training) that rotorcraft pilots perform off-base while at or visting the airfield. The subject EIS improves on this topic by showing the location of the "closed pattern flight tracks" (the loop which helicopter pilots follow to practice; Appendix B, Figure 3), but does not specifically study the impacts to our residential community – the only off-base residential area proposed for such helicopter training operations in the EIS. However, this is far and away the most problematic activity that occurs at and around the airfield and it is poorly covered in the EIS and Appendix B (Aircraft Noise Modeling Report).

In the fall of 2013, concerns began to surface within our community of very significant increases in the quantity, frequency and sound level of military helicopter traffic which were flying directly over our small community. The flights were repeated circular routes over the homes in our residential area on 4 to 7 minute intervals. Our organization's noise study of the practice operations indicated that peak noise levels in our community during practice training flights were typically 75 dB(A) and many times exceeded 80 dB(A) peaks in our residential neighborhoods during two to three hour training periods daily and on weekends. The policies for these practice sessions allowed such practice to occur as early as 6am and as late as 11pm over residential homes. The peak sound levels during overflights were consistently above the 65 dB(A) limit established by NEPA during the overflights.

To the best of our knowledge, no master plan, EIS, or scoping documents for operations at DAA have specifically studied the sound levels in our community under the closed pattern helicopter loop. What noise modeling that was done in the past was typically DNL and confined to on-base impacts from runway operations, not taking into account training overflights of our community. Our monitoring of these flights over a four year period led to discussions of the problems between our community and the then-commander of Davison Airfield Colonel Prescott Farris and his successor Colonel Mark Kappelmann, as well as limited communication with the U.S. Air Force senior staff at JBA.

Through constructive discussion and analysis by both our organization and the above DAA commanders over the past four years, the problematic practice flights along the closed pattern loop have now ceased over our community for the past two years. However, in Appendix B, the closed loop training pattern is shown directly over our community in Figure 3 ("Helicopter Closed Pattern Flight Tracks"). We raise this point first in our group of five concerns to underscore how, as the most problematic of concerns, the identification of a problem, followed by direct dialogue with responsible, key Army personnel led directly to a solution, yet the EIS makes no mention of this policy change to address the problem.

For these reasons, we believe it is a problem that the EIS doesn't study the topic of the impact of helicopter training operations off-base and as a result, we remain vigilant of a return of this severe environmental problem and realize the modernization of the airfield could lead to increased operations and a return to high levels of noise in our community.

Therefore, we request that the EIS address the issue head-on by studying whether the relatively unrestricted training and practice operations are appropriate for an airfield with such a highly residential population directly adjacent to it and its traffic patterns and whether other military bases/locations exist to allow for pilots to complete their compulsory and regular training. Additionally and most importantly, sound studies such as an AICUZ should be performed for Davison with on- and off-base practice operations being studied specifically and the effects of such activities both on and off the base/airfield.

The use of Davison Airfield for practice flights by U.S. Air Force UH-1 helicopters

As a result of the monitoring of flights between 2014 and 2017 and the conversations and meetings held with DAA to address the issue of training flights over our residential community, it became clear to our organization that the policy which the Department of Defense apparently has to allow various branches of the military to train as "guests" at airfields other than a given pilot's "home base" was causing a part of the problem at Davison. Specifically, the U.S. Air Force was apparently using Davison Airfield as a supplementary training location for their UH-1 pilots from Joint Base Andrews, flying the same repetitious training patterns mentioned in the previous section above.

Our data showed the Air Force pilots appeared to demonstrate less sensitivity (while over our residential neighborhoods) to maintaining minimum altitude or following posted DAA NOTAM (Notice to Airmen) and policies/protocols regarding arrival, departure, etc. more often, and were generally more problematic from a noise perspective. However, the EIS does not speak to the "guest use" of the facility as a helicopter training location for not only the 'resident' Army Aviation Brigade, the 911th Engineers, and D.C. National Guard, but also the very regular use that the U.S. Air Force was making of the airfield for training with their UH-1's, apparently due to the proximity by air to Joint Base Andrews.

We recommend the EIS be amended to study the use of Davison as a training facility for other branches of the military and whether DAA is large enough to accommodate additional operations from other military bases on such a small airfield so proximate to residential neighborhoods. Such study should include assessment of other locations for such training to determine what level of training activities are mandatory for DAA, rather than nearby, yet more remote military facilities. Our community opposes the use of Davison as a training facility for the Air Force, Marines, Coast Guard and other non-resident branches of the military and government.

Practice activities, including extended hovering, at DAA helipad adjacent to residential homes

The third most problematic environmental problem identified by our three year study of Davison rotorcraft traffic was that certain types of training required of military helicopter pilots demanded extended periods (sometimes hours) of what we refer to as "hovering" near the DAA helipad. This activity was unfortunately located just south of our community's closest neighborhood (Mount Air subdivision) and the pulse noise which it generates is problematic for different reasons than persistent training flights overhead. Our data also shows that the activity generates sound levels higher than 65 dB(A) at the residential homes on the north side of Route 286 (the highway which separates the community from the airfield.

A brief review of the graphics in the EIS show a number of locations where alternative "hovering" locations could be studied on DAA property. The study could determine the environmental impact of such on-base training exercises proximate to our residential community and whether simply relocating the training operation to a point east of the control tower or further south on the opposite side of the runway would mitigate noise levels in our community sufficiently.

We therefore request that the Army amend the EIS with a formal study of this specific activity and whether the helipad itself or at least the "hovering" type of training can be relocated to a point further east or south as part of the implementation of the modernization initiative.

Takeoffs and landings of military rotorcraft in violation of published NOTAM flight rules

Less frequent than environmental problems associated with training operations in the three categories above, though still sufficiently frequently to merit inclusion in our commentary and observations, our data from 2014 through 2018 indicated that far too many military helicopter pilots chose to fly over our residential community when flying between DAA and points north, rather than following published directives on routes. We referred to this as "cutting the corner" (due to the 'shortcut" pilots were taking from DAA helipad to reach the established helicopter routes of the Beltway and Interstate 395 toward the Pentagon and DCA). Please note that these flight routes are not shown or studied on any of your maps or graphics in your "Aircraft Noise Modeling Report" in the EIS appendices, yet they do happen and should be studied.

This practice severely and negatively impacts a number of neighborhoods in the south of our community (Raceway Farms, Newberry Station, and Mount Air) which are most proximate to the helipad. By working directly with DAA command over the past four years, NOTAM's and awareness campaigns for military helicopter pilots have been established to address this failure to "Fly Friendly". The current NOTAM requires helicopter flights to arrive and depart from DAA in a manner which avoids direct overflight of our residential community by following Route 286 between DAA's helipad and I-95.

We believe the EIS and Appendix B should speak to this environmental problem that is inherent to a helipad as it is logical to foresee given DAA's location relative to the District of Columbia and points north and the lack of published route maps south of the Beltway (see next section below) and easy to study.

Lack of a published helicopter route map in the Interstate 95 corridor south of the 495 Beltway

As mentioned in the previous section, our research with the FAA and Army shows that the Helicopter Route Map published by the federal government for this area clearly identifies the route which the majority of rotorcraft should fly inside the Beltway, along the southern portion of the Beltway, and other high traffic corridors. However, one high traffic corridor which has not been specifically identified on the official route map is the Interstate 95 corridor between the Springfield Interchange and Occoquan River. Our research shows that maps from 1990 and 2015 are nearly identical in this key corridor, yet helicopter traffic has increased in the southern part of Fairfax County by a dramatic amount during those 25 years. Please refer to the footnotes at the end of this comment letter for references to the 1990 and 2015 helicopter route maps.

Specific to DAA, our data and analysis indicate that formalizing a route between the Springfield Interchange and the Occoquan would improve the compliance of rotorcraft arriving from and departing to the west to Interstate 95 from DAA by creating an appropriate route to join, drawing helicopter traffic away from overflying residential communities like ours. Having a formal route to connect to the already-established Beltway routes will hopefully provide military helicopters between JBA and DAA a route which avoids overflying residential neighborhoods east of I-95.

Currently, a NOTAM serves the interim purpose of addressing this issue by requiring departing and arriving rotorcraft to use the Route 286 (Fairfax County Parkway) between DAA and I-95, but we believe the EIS should include a recommendation that the FAA establish a formal helicopter route along Interstate 95 between the Occoquan River and Springfield Interchange on the official route map to assist with formalizing this NOTAM's intent. The EIS should also not show proposed or recommended flight tracks through our residential community.

Summary and Recommendations

Our organization believes that the draft EIS is inherently flawed by the absence of identifying the noise impacts of offsite helicopter training operations and undocumented arrival/departure routes, the absence of studying such activities and the options available to the Army for mitigation, and for failing to provide long range noise mitigation relative to rotorcraft operations which are proposed to continue at DAA. The negative impact to our community from constant helicopter overflights is not considered in the EIS. Where mention is made of the closed loop pattern (the previously mentioned "training loop") in the EIS Appendices, no study of the sound levels it causes in residential areas is shown. Noise contours shown in the EIS are DNL, rather than the intense peak experienced by residents in and around their homes during repetitive helicopter overflights that are typical during training flights.

Where ongoing constructive discussion and cooperative effort between the commanders of DAA have mitigated the most egregious noise problems of the past several years, long range planning documents such as the EIS and Real Property Master Plan for Fort Belvoir should identify, study and provide mitigation in concert with the proposals for modernization and rehabilitation.

We ask that prior to its finalization, the EIS be amended to study these topics presented herein and that policies established to date with the Army relative to DAA helicopter operations be included in the EIS. We further ask that an AICUZ-level study be performed for DAA as has been recommended in past comprehensive planning documents for DAA by the Army if training operations are to continue to be performed near and/or above residential areas.

We request that the U.S. Army continue to include our community in discussions related to the modernization and rehabilitation of DAA. The direct communication which the recent commanders of DAA and of the Army Aviation Brigade have had with our community over the past four years have been key in mitigation achieved to date and we believe strongly that continued improvement is possible with direct communication between stakeholders. Our community has been a good neighbor to Davison Airfield and Fort Belvoir for many decades and we wish that good relationship to remain.

We would like to also take this opportunity to thank Colonels Farris and Kappelmann for their community outreach and noise mitigation efforts accomplished to date and look forward to working with the most recent commander at DAA, Colonel Adkins, on continued mitigation. Our organization stands available to answer questions, discuss topics further, or participate in round table or committee discussions. Thank you for the opportunity and forum to provide these comments.

Respectfully,



Greg Budnik, Director
NewingtonVA.org

cc: Colonel Winfield Adkins

Footnotes and FAA helicopter map follow on next page

Footnotes:

1. The residential neighborhoods of Newington, Virginia are: Mount Air, Hunter Estates, Hunter Woods, Raceway Farms, Newberry Station, Villages of Mount Air, Twinbrook at Mount Air, Winstead Manor, and Hollybrook Farms* (*to be constructed in 2021).
2. Edwards & Kelcey (April 2005) – Regional Helicopter System Plan for Washington Metro Area
3. Helicopter Route Map, July 1990 - https://www.loc.gov/item/90683484/
4. Helicopter Route Map, July 2015 – see image of excerpt from full map below

Excerpt from July 2015 FAA Helicopter Map of Baltimore-Washington area



September 8, 2020

Via email: FortBelvoirNOI@usace.army.mil

U.S. Army Fort Belvoir Directorate of Public Works
Attn: DAAF Draft EIS
Environmental Division, Chief
9430 Jackson Loop, Building 1442, Rm #230
Fort Belvoir, VA 22060-5116

Re: Draft Environmental Impact Statement and Draft Finding of No Practicable Alternative for the Davison Army Airfield Area Development Plan

Dear Sir or Madam:

I write on behalf of the more than 4,500 members of Audubon Society Northern Virginia ("ASNV") in response to the notice of availability of the subject analyses of the Davison Army Airfield ("DAAF") Area Development Plan. The mission of ASNV is to conserve and restore natural ecosystems, focusing on birds, other wildlife, and their habitats for the benefit of humanity and the earth's biological diversity. Over the last 50 years North America has lost over 3 billion birds.[1] The greatest loss arises from habitat loss, but building collisions are another significant factor in bird deaths. An estimated 300 million to 1 billion birds are killed each year from such collisions.[2] Because of the location of the DAAF location, ASNV believes that the demolition and construction activities outlined could have a significant adverse impact on the environment and natural resources unless the Directorate of Public Works incorporates at the outset design elements and plans to mitigate potential loss of birdlife from the proposed development.

The development area includes part of or is immediately adjacent to and part of the watershed for the Lower Potomac River Important Bird Area ("IBA"), adopted by ASNV in 2010.[3] Fort Belvoir is an important part of the Lower Potomac River IBA, including the Accotink Bay Wildlife Refuge and other forested acreage (including wetlands and floodplains) that provide habitat for breeding and migratory birds. According to the draft Environmental Impact Statement ("EIS"), the development work for the full implementation alternative will result in "loss of approximately 9 acres of

[1] Rosenberg, Kenneth V., et al., Decline of the North American avifauna, *Science*, Vol. 366, No. 6461, pp. 120-124.
[2] National Audubon Society, https://www.audubon.org/news/two-bills-introduced-reduce-building-collisions-and-protect-seabirds.
[3] Audubon Society of Northern Virginia, Important Bird Areas at https://www.audubonva.org/important-bird-areas.

vegetation and forested habitat, and encroachment on approximately 21 acres of . . . habitat" for Breeding Birds of Management Concern.[4]

To avoid or mitigate the loss of birdlife, ASNV recommends the following measures.

- Include bird-friendly building design elements in DAAF development plans.[5] Early planning should allow for measures that will deter collisions. Windows should not be of reflective or mirrored glass and should include fritting or frosted glass patterns on the outside layer of glass that follow the American Bird Conservancy guidelines for bird-safe window designs. Large, contiguous expanses of glass should be avoided, but if they are incorporated in any area, such as a building entrance, they also should incorporate patterns that deter collisions. If any windows are designed to open, they should include full screens, which deter collisions. Finally, breaking up any glass on the exterior of the building with brick or other non-window construction materials can reduce the potential risk for bird collisions.

- Lighting design is also important both for the buildings and surrounding parking lots. During migration, birds can become confused by excessive night lighting, resulting in collisions and reduced migration success.[6] The LEED standard includes recommendations for both interior and exterior lighting.[7] Energy efficiency is important not just for purposes of economy but also to mitigate climate change (which affects wildlife and its habitat), but any exterior lighting design should not achieve efficiency at the expense of natural resources. Because light pollution can affect adversely both plants and animals,[8] lighting design for the facility should avoid blue-rich lights and follow the standards developed jointly by the International Dark Sky Association and the Illuminating Engineering Society of North America, particularly in preventing backlight (trespass), uplight and glare. Those

[4] DAAF Area Development Plan, Draft EIS, Executive Summary, page ES-13.
[5] See LEED Pilot Credit 55, Bird Collision Deterrence. See also recommendations for bird-friendly design from the American Bird Conservancy. http://collisions.abcbirds.org/.
[6] National Audubon Society, https://www.audubon.org/conservation/project/lights-out.
[7] Exterior light design also should address the building roof if it is to include exterior telecommunications equipment.
[8] See Visibility, Environmental and Astronomical Issues Associates with Blue-Rich White Outdoor Lighting, International Dark-Sky Association, May 4, 2010, available at https://www.darksky.org/why-is-blue-light-at-night-bad/. See also Light Pollution Is Altering Plant and Animal Behaviour, https://phys.org/news/2018-03-pollution-animal-behaviour.html ; Light Pollution Effects on Wildlife and Ecosystems, https://www.darksky.org/light-pollution/wildlife/; Light Pollution Can Harm Wildlife, https://darksky.org/wp-content/uploads/bsk-pdf-manager/Wildlife-Brochure-FINAL2_32.pdf ; Light Pollution Harms the Environment, http://cescos.fau.edu/observatory/lightpol-environ.html; The Vanishing Night: Light Pollution Threatens Ecosystems, https://www.the-scientist.com/features/the-vanishing-night--light-pollution-threatens-ecosystems-64803; Animals Need the Dark, https://www.nps.gov/articles/nocturnal_earthnight.htm; Light Pollution Is Bad for Humans but May Be Even Worse for Animals, https://theconversation.com/light-pollution-is-bad-for-humans-but-may-be-even-worse-for-animals-31144.

issues are particularly important because of the location of buildings in or adjacent to the Lower Potomac River IBA.[9]

- Because habitat loss from development is the greatest threat to native wildlife, landscape design should tie the facility more closely to its surrounding natural habitat. To benefit native wildlife, DAAF landscaping should use 100 percent native trees, shrubs, forbs (perennials) and ornamental grasses.[10] Native plants which evolved along with native wildlife provide better nutrition for native wildlife than non-native plants. Avoiding herbicide and pesticide runoff is particularly important because of the facility's location in the drainage area for the Lower Potomac River IBA, including Accotink Bay Wildlife Refuge. With that drainage area in mind, facility design should improve storm water management by adding bio-retention areas and rain gardens along medians and around the edges of the asphalt parking lots with large native shade tree plantings throughout.

- Reduction in the greenhouse gas footprint of the buildings also can mitigate their impact. A 2019 National Audubon Society report found that two-thirds of studied North American birds are at increasing risk of extinction from global temperature rise.[11] The buildings could minimize their greenhouse gas footprint by installing solar panels. If the panel installation is not part of original construction, the building design should include a rooftop structure adequate to support a future installation.

- Finally, all demolition and construction activities should follow the August 2, 2018, Fort Belvoir Policy Memorandum #78, Conservation of Migratory Birds.

ASNV appreciates your consideration of our recommendations. If you have questions or need additional information, you can contact me at president@audubonva.org.

Yours,

/s/
Thomas L. Blackburn
President

[9] See International Dark Sky Association, Light Pollution, at https://www.darksky.org/light-pollution/. See also Joint IDA_IES Model Lighting Ordinance with User's Guide, June 15, 2011, available at https://www.darksky.org/our-work/lighting/public-policy/model-lighting-laws-policy/.
[10] See ASNV's Audubon at Home program, https://www.audubonva.org/audubon-at-home.
[11] See National Audubon Society, Survival by Degrees, at https://www.audubon.org/climate/survivalbydegrees.

Davison Army Airfield
Area Development Plan
Draft Environmental Impact Statement (EIS)

Comment Form

Comments will be addressed in the Final EIS and become part of the public record.
Personally identifiable information will not be published.

The Draft EIS is available online at:
https://home.army.mil/belvoir/index.php/about/Garrison/directorate-public-works/environmental-division

Send this form as an email attachment to: FortBelvoirNOI@usace.army.mil

Print and mail this form to:

US Army Fort Belvoir Directorate of Public Works
Attn.: DAAF Draft EIS
Environmental Division, Chief
9430 Jackson Loop, Building 1442, Rm #230
Fort Belvoir, VA 22060-5116

Comments must be sent by September 8, 2020

1. Please provide your information in the boxes below. *Providing this information is optional*.

Name:	Fred Crawford
Title:	Mr.
Agency / Organization:	Historic Pohick Church Representative
Street Address:	9301 Richmond Hwy
City, State, ZIP:	Lorton, VA 22079
Email Address:	[redacted]

2. Would you like to be notified when the Final EIS is published (enter YES or NO): Yes

If YES, please make sure to provide a mailing address or email address above.

3. Please type your comments in the box below. The box will automatically continue onto the next page if additional space is necessary. *If printing and filling in this form by hand, please continue comments on the back or on a separate sheet of paper.*

This comment is on the fact sheets for the public discussion. National Historic Preservation Act fact sheet on page 2 gives incorrect dates for construction of Pohick Church. The construction was started in 1769 and not completed until early 1774. The original undertaker (Project Manager),

Daniel French died in 1771. He was replaced by George Mason, who completed the project in February, 1774.

Thank you for your comments on the Draft EIS!

Tribal Comments

Davison Army Airfield
Area Development Plan
Draft Environmental Impact Statement (EIS)

Comment Form

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Environmental Division, Chief
9430 Jackson Loop, Building 1442, Rm #230
Fort Belvoir, VA 22060-5116

Comments must be sent by September 8, 2020

1. Please provide your information in the boxes below. *Providing this information is optional*.

Name:	Terry Clouthier
Title:	Cultural Resource Director
Agency / Organization:	Pamunkey Indian Tribe
Street Address:	
City, State, ZIP:	
Email Address:	terry.clouthier@pamunkey.org

2. Would you like to be notified when the Final EIS is published (enter YES or NO): yes

If YES, please make sure to provide a mailing address or email address above.

3. Please type your comments in the box below. The box will automatically continue onto the next page if additional space is necessary. *If printing and filling in this form by hand, please continue comments on the back or on a separate sheet of paper.*

Have there been any areas within the Davison Army Airfield (DAAF) which have not been subject to archaeological survey? If the answer to this question is affirmative, will these areas be subject to

archaeological survey prior to any ground disturbing activities? My office recommends archaeological survey in any areas not previously surveyed.

Thank you for your comments on the Draft EIS!

Private Individual Comments

Carver, Craig

From: FortBelvoirNOI <FortBelvoirNOI@usace.army.mil>
Sent: Thursday, August 27, 2020 11:57 AM
To: Carver, Craig
Subject: [EXTERNAL] FW: [Non-DoD Source] construction

Categories: Yellow Category

Please include in the matrix.
Heather

-----Original Message-----
From: Helen Franssell [redacted]
Sent: Thursday, August 27, 2020 10:26 AM
To: FortBelvoirNOI <FortBelvoirNOI@usace.army.mil>
Subject: [Non-DoD Source] construction

My family is concerned about any expansion of the airfield, as it already contributes to noise pollution that is disruptive to local households. We frequently experience loud helicopter traffic that rattles our homes well into the evening when families/children are trying to sleep.
Thank you for your consideration.

Helen Franssell, Mason Neck resident

Comments on Davis Army Airfield Area Development Plan Draft Environmental Impact Assessment (EIS)

From an environmental point of view, the Partial Implementation Alternative has about half the impact of the Full Implementation Alternative—loss of 1.4 versus 3.6 acres of wetlands; impacts on 517 versus 2,026 linear feet of stream; impacts on 15 versus 23 acres of RPA; development of 3.2 versus 7.5 acres of floodplain; and increase in impervious surface of 21 versus 36 acres. On this very constrained and very environmentally sensitive and habitat-rich site, therefore, the Partial Implementation Alternative seems preferable.

One wonders if it might be possible to better respect the environmental sensitivity and constraints of the site while still meeting the Army's (and its tenants') operational needs and desires. For example, the Full Implementation Alternative adds eight parking lots to DAAF. Could it be possible to consolidate and reduce some of this proposed surface parking, perhaps even locate some of it offsite, and run shuttle buses to serve non-emergency employees, in order to reduce impervious surface and impacts on wetlands and RPA? Or, put parking on top of the new buildings, or underneath new airfield surfaces? I did not find a discussion of what options the Army considered to pull new development out of sensitive areas as much as possible, or why the option of developing more in the northeast, non-RPA portion of the site was unfeasible.

Some of the siting of particular facilities is puzzling. For example project 13 (Aircraft Paint Shop) seems likely to be the source of hazardous substances, yet it appears to be sited practically on top of a tributary of Accotink Creek and a nearby large wetland; one would think such facilities should be located farther away, out of the floodplain, to reduce the risk of spills into the creek or flooding that would lead to contamination.

This area (in fact, much of DAAF) is identified by NOAA as having multiple flooding hazards. When it made its plans and calculated their impacts, did the Army take into account the increasing intensity of storm events due to climate change, and the increasing risk of flooding they pose?

The FAQs state, "Fairfax County regulates proposed development activities within RPAs by requiring the preparation of a Water Quality Impact Assessment." It also requires submission of a request for an exception to the Chesapeake Bay Preservation Ordinance, and a public hearing before the Chesapeake Bay Exception Review Committee, which approves or denies requests for development activities within the seaward 50 feet of the RPA. Will the Army do a Water Quality Impact Assessment, and apply for an exception to Fairfax County's Chesapeake Bay Preservation Ordinance?

The FAQs also say, "While the total impervious coverage in the Main Post portion of the Accotink Creek watershed would increase to approximately 12 percent [from 9 percent], it would represent only a 0.4 percent increase in impervious surfaces within the Accotink Creek watershed as a whole. Water quality on Main Post and DAAF would continue to be strongly influenced by existing development, impervious surfaces, and stormwater management practices in the majority of the Accotink Creek watershed upstream of the installation." So true! And yet this is the conundrum, is it not? All of the development is continuing, unabated, and each piece is justified as "only" representing a small increase in impervious surfaces within the watershed. Yet the cumulative impacts keep accumulating, and they are devastating to our local streams—death by a thousand cuts.

I hope the Army can find a way to do better by Accotink Creek. I support comments from the Friends of Accotink Creek. Thank you for the opportunity to comment.

Betsy Martin

8707 Stockton Parkway

Alexandria VA 22308

betsy@folhc.org

Carver, Craig

From: FortBelvoirNOI <FortBelvoirNOI@usace.army.mil>
Sent: Tuesday, September 08, 2020 8:44 AM
To: Carver, Craig
Subject: [EXTERNAL] FW: [Non-DoD Source] Davidson AAF Draft EIS response

FYI

-----Original Message-----
From: Karen Walters [mailto:walters.karen@gmail.com]
Sent: Monday, September 7, 2020 11:39 AM
To: FortBelvoirNOI <FortBelvoirNOI@usace.army.mil>
Cc: mtvernon@fairfaxcounty.gov
Subject: [Non-DoD Source] Davidson AAF Draft EIS response

Good morning,
I have just read the Draft EIS for the proposed changes to Davidson AAF. As I understand it these changes occur within the Chesapeake Bay Resource Protection Area (RPA). A significant portion of this is in the 100-year floodplain or wetlands. I oppose the proposals to this property because:

1. This is inconsistent with County Policy and Ordinances. The Comprehensive Plan Policy Plan declares the County's policy to be to identify, protect, and restore an Environmental Quality Corridor system, and to include in it, lands which can achieve any of several purposes, including habitat quality, connectivity, and stream buffering. The FloodPlain Ordinance requires that uses in the floodplain meet the environmental goals and objectives of the adopted comprehensive plan for the property.

Your plans are not consistent with the floodplain ordinance requirement that the proposal meet "the environmental goals and objectives of the adopted comprehensive plan for the subject property." (2-9.05-7-C)

2. The property is in an RPA. Building on this property requires an exemption or exception to the Chesapeake Bay Preservation Ordinance. In their natural condition, RPAs protect water quality, filter pollutants, reduce the volume of stormwater runoff, prevent erosion and perform important biological and ecological functions.

3. This plan is reckless and does not take into account the potential loss of property and life for Fairfax County residents who will be impacted by your proposal.

Fairfax County Zoning Ordinance (Article 2, Part 9) regulates uses in floodplains "to provide for safety from flood and other dangers; to protect against loss of life, health, or property from flood or other dangers; and to preserve and protect floodplains in as natural a state as possible for the preservation of wildlife habitats, for the maintenance of the natural integrity and function of the streams, for the protection of water quality, and for the promotion of a zone for groundwater recharge."

As a property owner who lives by the water, within 50' of the floodplain, you are directly impacting my property, and increasing the likelihood of flooding issues for our neighborhood due to your destruction of these areas. Your changes increase risk. Risk to property and risk to life. I find these two incompatible with DoD's usual risk assessments where those two factors generally rank high in a risk assessment.

These RPAs were implemented in order to protect the water quality of the bodies of water draining into the Chesapeake as well as the land, from the flooding and erosion that is a byproduct of development.

This proposal, combined with the other current sales/proposals in the local area (River Farm and the Stockton Pkwy build) indicate a serious problem in our area and a lack of consideration to the impact that each of these "exceptions" have on local residents. Individually they are destructive. Cumulatively, they are dangerous and show a disregard to the risk for residents in Fairfax County, and in particular to those in the Mt. Vernon area.

In summary, your proposal is contrary to the intent of the RPA, and does not take into adequate consideration the impact and potential for loss to the residents of this community. I am opposed to this proposal.

v/r,

Karen M Walters

September 8, 2020

Public Comments prepared by

Catherine C. Ledec, 2020 Fairfax County Park Authority Sally Ormsby Environmental Stewardship Award, 2018 Fairfax County Citizen of the Year and 2018 Fairfax County Environmental Excellence Awardee,

Project name:

Davidson Army Airfield Area Development Plan

This project proposes the the permanent loss of approximately 23 acres of land currently designated as Resource Protection Areas (RPAs). RPA lands are part of the Chesapeake Bay watershed and are supposed to be preserved per State and local laws.

Over 30-years through the proposed plan it is expected that 3.6 acres of wetlands and 2,026 linear feet of streams will have significant adverse impacts and 7.5 acres to be developed in the 100--year floodplain.

This is an *unacceptably significant adverse environmental impact that is fully and completely avoidable with a project redesign.*

Site selection should include as a high priority, sites that will not impact RPA, wetlands nor streams.

7.5 acres to be developed in the 100-year floodplain. These projects should be redesigned to not occur within the RPA, 100 year floodplain and streams and wetlands.

With climate change already impacting us and with recent significant flooding events in the immediate vicinity resulting in flooding we know that the impact of any proposed development in the flood plain, RPA, wetlands and streams WILL RESULT in flooding and property damage and it is highly likely that a public safety and very dangerous conditions will result putting people's lives and property at risk. Building in these environmentally sensitive areas plain should not occur. The reason these lands are identified as flood plain is so that they can be avoided and development occur elsewhere. Fort Belvoir has other lands that can be used for this purpose.

As a priority Resource Protection Areas, Streams and Wetlands should be 100% (completely) avoided. These lands should be preserved. The footprint of buildings and impervious surfaces should be reduced. This includes parking lots and areas to be covered with asphalt and concrete. Natural surfaces that allow for stormwater to be infiltrated directly where it falls should be used as a priority. All trees removed as a

result of any proposed projects should be replaced with native species at twice the diameter at breast height of trees removed.

If RPAs, streams and wetlands are impacted by projects mitigation (through the expansion of conservation areas on Fort Belvoir property) should be provided at twice the rate of the loss and with better or like-for-like lands.

The proposed work should be fully and completely rejected.

I urge the full and complete rejection of this proposed work.

The US Army and its contracted staff must work creatively and innovatively to avoid all adverse impacts to Resource Protection Areas, 100-year flood plains, wetlands, streams and creeks. The US Army deserves a suite of projects that respect, protect and conserve our environmental resources rather than destroys them. As a federal government project private industry looks up to you for best practice examples of your work. This proposal is not a best practice and should be fully rejected.

Davison Army Airfield
Area Development Plan
Draft Environmental Impact Statement (EIS)

Comment Form

Comments will be addressed in the Final EIS and become part of the public record.
Personally identifiable information will not be published.

The Draft EIS is available online at:
https://home.army.mil/belvoir/index.php/about/Garrison/directorate-public-works/environmental-division

Send this form as an email attachment to: FortBelvoirNOI@usace.army.mil

Print and mail this form to:

US Army Fort Belvoir Directorate of Public Works
Attn.: DAAF Draft EIS
Environmental Division, Chief
9430 Jackson Loop, Building 1442, Rm #230
Fort Belvoir, VA 22060-5116

Comments must be sent by September 8, 2020

1. Please provide your information in the boxes below. *Providing this information is optional*.

Name:	Thomas A Gerard
Title:	
Agency / Organization:	Mount Vernon area resident
Street Address:	2417 Londonderry Road
City, State, ZIP:	Alexandria, VA 22308
Email Address:	Tom.Gerard@verizon.net

2. Would you like to be notified when the Final EIS is published (enter YES or NO): yes

If YES, please make sure to provide a mailing address or email address above.

3. Please type your comments in the box below. The box will automatically continue onto the next page if additional space is necessary. *If printing and filling in this form by hand, please continue comments on the back or on a separate sheet of paper.*

The loss of 23 acres of RPA is not acceptable impact. Mitigation has to be stronger than compliance with USACE granted permits. Aging buildings should be replaced within same footprint rather than destroying more land. Need for more and larger facilities are based on unrealistic assumptions and

bloated criteria for space. Long-term, direct, less-than-
significant adverse impacts on Resource Protection Areas (RPAs) from permanent loss of approximately 23 acr
es of land designated as such.

Thank you for your comments on the Draft EIS!

Draft EIS Public Meeting Materials

SAIE-ESO

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Interim Army Procedures for National Environmental Policy Act (NEPA)

1. References:

a. Memorandum, ASA(IEE), SAIE-ESO, 24 Mar 2020, subject: Interim Army Procedures for National Environmental Policy Act (NEPA)

b. Memorandum, Secretary of Defense, 1 Apr 2020, subject: Guidance for Commanders on the Implementation of the Risk Based Responses to the COVID-19 Pandemic

c. Memorandum, Secretary of Defense, 19 May 2020, subject: Guidance for Commanders on Risk-Based Changing of Health Protection Condition Levels During the Coronavirus Disease 2019 Pandemic

d. Guidelines for Opening Up America Again https://www.whitehouse.gov/openingamerica/

2. This memorandum responds to changing coronavirus (COVID-19) related health protection measures and their application to the NEPA public involvement process. This memorandum supersedes and replaces the memorandum referenced in 1.a.

3. Reference 1.a. established interim Army NEPA procedures in consideration of the COVID-19 public health emergency. References 1.b. and 1.c. provided subsequent guidance for Commanders on implementation of risk-based responses and Health Protection Condition (HPCON) levels associated with the COVID-19 pandemic. Reference 1.d. provides current Federal guidelines, phased criteria, and health protection measures for individuals, states, and regions.

4. Interim Army Procedures for NEPA:

a. Alternative NEPA public meetings may continue to be conducted as virtual meetings, postponed, or cancelled, as deemed appropriate.

b. In-person NEPA public meetings may now also occur in a manner consistent with COVID-19 health protection measures, applicable restrictions, and guidelines. In planning in-person NEPA public meetings, consideration should be given to guidelines from the U.S. Center for Disease Control (CDC), states, and local governments, and the use of protective measures, to include “social-distancing” (maintaining space between participants) and use of masks. Participation by those who do not wish to attend an in-person NEPA public events should be accounted for through alternative means.

c. Alternative means of NEPA public engagement along with in-person engagements will be implemented and documented in public participation plans. Virtual meetings may be conducted using online meeting / collaboration tools, teleconference, social media, or email, as appropriate.

d. The NEPA public and Federal Register notices will inform the public about public participation and/or alternative participation procedures and how to obtain NEPA materials on the project web site or through the mail. Public notices will provide a contact phone number, email, web site address, and mailing address.

e. Project information, including, but not limited to, scoping materials, draft NEPA documents, and comment forms will be available on project websites. This includes materials presented at in-person NEPA public meetings.

f. In the absence of in-person public meetings, project materials normally presented at public meetings should be included on the project website, including, but not limited to, scoping materials, draft NEPA documents, and comment forms. The material will be distributed, when requested, through the mail as either hard copies or as printable compact discs (as requested).

g. Army NEPA proponents will ensure cooperating agencies are aware of adapted public meetings and/or NEPA alternative participation procedures.

5. The Army’s guiding principle for resuming in-person public participation in the Army NEPA process during the COVID-19 pandemic is the protection of the health and safety of members of the public, Army representatives, and all other participants. All necessary precautions must be applied, and all appropriate health protection measures, applicable restrictions, and guidelines must be followed.

6. This memorandum will remain in effect for 120 days from the date of signature. The interim Army NEPA procedures do not apply to Civil Works functions of the U.S. Army Corps of Engineers.

7. Point of contact for questions on these procedures is Lorri Schwartz, (571) 363-7511, email: lorri.a.schwartz.civ@mail.mil.



AMY L. BORMAN
Deputy Assistant Secretary of the Army
Environment, Safety and Occupational Health

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CF:
Director of Business Transformation
Commander, Eighth Army

TRANSCRIPT
Public Meeting
Davison Army Airfield Area Development Plan
Draft Environmental Impact Statement
August 24, 2020 – 1:00 PM to 3:00 PM

Kelly Stoll:
I want to welcome everyone. My name is Kelly Stoll, and I'm going to be the facilitator for today's call. As a reminder we are recording to maintain the record of the discussion and the comments and questions that we receive. Your participation in this call indicate your consent to the recording.

In light of the restrictions on public gatherings due to COVID-19 we're holding these teleconferences in lieu of a traditional in-person public meeting to provide you, the public, with the opportunity to hear and ask questions about the Army's Proposed Action to implement an area development plan, or ADP, at the Davison Army Airfield or DAAF on U.S. Army Garrison, Fort Belvoir in Fairfax County, Virginia. Projects in the ADP will provide DAAF with facilities and infrastructure needed to support its mission over the next 30 years.

Today's calls are being held during the 45-day comment period for the Draft Environmental Impact Statement, or Draft EIS, that the Army has prepared to analyze the potential environmental effects from implementing the proposed ADP projects. The public comment period began on July 24th and will end on September 8th. The Draft EIS has been prepared in accordance with the National Environmental Policy Act, or NEPA, which is the primary law that requires agencies to consider the effects of their actions on the environment. NEPA includes requirements for the public to be involved in the federal decision-making process and be provided with opportunities to comment on proposed federal actions.

Today's meetings are such an opportunity. Today's meetings are also an opportunity for the public to comment on projects in the DAAF ADP that would potentially affect the 100-year floodplain at the DAAF. The Army has prepared a Finding of No Practicable Alternative or FONPA in accordance with Executive Order 11988 to explain its decision to implement the projects in the flood plain at DAAF.

Finally, today's meetings are the opportunity for the public to comment on the Proposed Action's potential effects on historic and cultural resources in accordance with Section 106 of the National Historic Preservation Act.

Two meetings are being held today. This one at 1:00 PM and another at 6:00 PM this evening for the DAAF ADP Draft EIS. The format and content will be the same at each meeting. Although we will be taking comments and questions from audience members during today's call, we will not be responding directly to questions and comments. All questions and comments received today will be addressed appropriately in the Final EIS, which is expected to be completed in 2021.

In a few minutes, we'll review the administrative rules for providing comments and questions during the teleconference. This call is scheduled from 1:00 PM to 3:00 PM. At this point, I would like to introduce the Army project team for the DAAF ADP Draft EIS that we have on the call today. The project team includes military and civilian personnel from Fort Belvoir, Davison Army Airfield, the Military District of Washington or MDW and the Army Corps of Engineers. The project team also includes staff from the Army's contractor for the ADP EIS, Bluestone Environmental and AECOM.

Now I will review the meeting format. This meeting is audio only. There are no video or visual components to this meeting. To remind everyone this call is being recorded to maintain a record of the

discussion and all of the comments and questions received during the meeting. Your participation in this call indicate that you're consenting to the recording.

The meeting will consist of an overview of the DAAF ADP and the Draft EIS followed by a timed question and comment period. The procedures for providing a comment and question during the meeting are as follows:

All callers are muted in the call. Each caller will be addressed by their phone number as that's what we have on the call. And you will be unmuted for three minutes to state your comment or question. I will give a 30-second warning before your time ends. When your phone number is called, please state your name, affiliation, if any, and contact information, phone, and/or email address. Please listen closely for your phone number to be called. If you are a member of the general public and wish to remain anonymous, please say so before starting your comment or question. If you do not wish to comment please respond, "No comment at this time."

The Army will review all comments and questions received during the 45-day Draft EIS public comment period. Substantive comments will be addressed in the Final EIS. The Final EIS will be expected to be issued next year. The Army's selected alternative for implementing the DAAF ADP will be codified in a record of decision or ROD, which will be issued following the Final EIS. If you do not wish to comment during today's call, or you wish to submit additional comments later, you may do so by either email or U.S. Postal Service. The email address for submitting comments is FortBelvoirNOI@usace.Army.mil. I'll spell that out. It is F-O-R-T-B-E-L-V-O-I-R-N-O-I-@-U-S-A-C-E. Army, A-R-M-Y.mill, M-I-L.

The mailing address is U.S. Army Fort Belvoir Directorate of Public Works. Attention, D-A-A-F Draft E-I-S. Next line. Environmental Division, Chief. The street address is 9430 Jackson Loop, Building 1442, Room 230, Fort Belvoir, Virginia, 22060-5116. The comment period ends on September 8, 2020. The Draft EIS and related documents, including posters and fact sheets for today's meeting and the Draft FONPA are posted for public review and download on the Fort Belvoir Environmental Division website.

You can find the Draft EIS materials by typing "Fort Belvoir Environmental Division" into your web browser. Then clicking [the] "Programs and Documents" tab [and] selecting "National Environmental Policy Act." The DAAF ADP Draft EIS is the first entry under the "Open for Public/Agency Review and Comment" heading. A presentation with the major discussion points from this meeting will also be posted on Fort Belvoir website with the other Draft EIS material shortly after this meeting.

Next, we'll begin today's presentation with some opening remarks from Lieutenant Colonel Beau Ashley. He's the deputy commander the Army Brigade at Davison Airfield. Sir?

Lieutenant Colonel Beau Ashley:

Thanks Kelly. Good afternoon, everyone. My name is Lieutenant Colonel Beau Ashley. I'm the acting commander of the US Army Aviation Brigade. Our headquarters is located at Davison Army Airfield. I want to thank everyone for calling in this afternoon. The purpose of this call in for a virtual telephone meeting is to offer the public another opportunity to provide comments on the Draft environmental impact statement or EIS for the Fort Belvoir Davison Army Airfield area development plan.

Given the current state of the COVID-19 virus, ensuring the health and safety of the public is of utmost concern. So we converted what would normally be an in-person meeting to a call-in format so we can provide the public an opportunity to comment on the Draft EIS in a safe manner.

The Draft EIS is available to the public on the Fort Belvoir website, which is noted in the public register and in the newspaper and on social media. In addition to the 24 August virtual meetings, there are several avenues for comment, including email and hard copy through the U.S. mail system. The 45-day

comment period will be open through 8 September. We welcome your comments, questions, and concerns. Our team has spent over two years working on this document to ensure our analysis provides factual details and consideration for impacts to the environment. Thanks.

Kelly Stoll:
Thank you, sir. We'll continue with the meeting with a brief overview of the DAAF ADP and the Draft EIS by Craig Carver, who is one of the consultants who assisted the U.S. Army Corps of Engineers with the present preparation of the Draft EIS. Craig....

Craig Carver:
Thank you, Kelly. Good afternoon, everyone. My name is Craig Carver and I'm an environmental specialist with AECOM, which is one of the consulting firms that is assisting the U.S. Army Corps of Engineers with the preparation of the Draft EIS. The U.S. Army Corps of Engineers has prepared the Draft ADP and Draft EIS on behalf of the Military District of Washington or MDW, which operates DAAF. Fort Belvoir owns and maintains the buildings, infrastructure, and underlying land at DAAF. Thank you very much for taking the time to join us today and learn about the ADP and the Draft EIS. We are conducting these meetings virtually and trying to make as much information publicly available as we can to provide transparency for the Proposed Action and encourage public involvement and participation in the spirit of NEPA.

We look forward to your comments and questions about the Proposed Action and assure you that they will be addressed appropriately in the Final EIS. As mentioned earlier, the Draft EIS is currently available for 45-day public review and comment period. This includes members of the general public, as well as federal, state and local regulatory agencies, nongovernmental organizations, and anyone else with an interest in the Proposed Action at DAAF. The 45-day public review period began on July 24th, 2020 and will end on September 8th, 2020. The Draft EIS and associated materials are available on the Fort Belvoir Environmental Division website, as Kelly mentioned earlier, and comments can be submitted during this call as well as by email or traditional U.S. Postal Service mail. The email and U.S. postal service addresses are available in the meeting materials on Fort Belvoir's website, and they will be repeated at the end of this presentation.

We'll now begin the overview of the Army's Proposed Action, alternatives for the Proposed Action, and a summary of the Draft EIS findings. First, a brief overview of DAAF. Davison Army Airfield, or DAAF covers approximately 350 acres on Fort Belvoir's North Post at the intersection of U.S Route 1 or Richmond Highway, and the Fairfax County Parkway. DAAF has been in operation since 1951. The airfield is home to multiple Department of Defense tenants with aviation missions, including The Army Aviation Brigade, or TAAB, the 12th Aviation Battalion, and the Civil Air Patrol, among others.

DAAF tenant missions are critical to the airfield’s location near Washington, D.C. and within the National Capital Region or the NCR. Conditions at DAAF include 65 percent of the buildings at the airfield are more than 30 years old and 40 percent are 50 years or older. Multiple facilities are past their intended life cycle and are obsolete undersized and/or inefficient. Several DAAF facilities are within safety zones associated with the airfield’s runway. These safety zones are designated by the Department of Defense and the Federal Aviation Administration or FAA. The facilities in these zones require temporary safety waivers to operate.

The Army's Proposed Action is to implement multiple construction, demolition, modernization and infrastructure projects that are recommended in the DAAF ADP or Area Development Plan. These projects are intended to provide tenants with the facilities and infrastructure needed to support their missions. Department of Defense regulations require the preparation of ADPs for discrete or identifiable

planning districts on military installations, such as an airfield like DAAF. The DAAF ADP will provide site planning direction at the airfield for the next 30 years and would be consistent with the Fort Belvoir Real Property Master Plan, which was updated in 2015. Projects in the DAAF ADP will replace outdated and inefficient facilities and will improve safety at the airfield. All of the DAAF ADP projects would be implemented within the existing boundaries of DAAF and the acquisition of additional land [would] not be required. The ADP does not include substantial changes in missions, air operations, or the number or types of aircraft and personnel at DAAF.

As stated in the Draft EIS, the purpose of the Proposed Action is to provide DAAF with an ADP consistent with the airfield's vision of creating a safe, secure, sustainable consolidated aviation complex that allows for mission growth and provides multiple services in a compact campus. This is the vision statement that was developed during planning meetings conducted at DAAF during development of the ADP. Fulfilling this vision statement would include upgrading and replacing an aging, undersized, inadequate, and inefficiently laid out physical infrastructure to allow DAAF to fully support its tenants ongoing missions and remove buildings and obstructions from airfield safety zones that require temporary safety waivers to operate. The Proposed Action is needed because DAAF facilities are aging or obsolete, inadequately sized, inappropriately sited, and do not adequately support ongoing missions.

The Draft EIS evaluates two alternatives for implementing the Proposed Action at DAAF: the Full Implementation Alternative, which would implement all of the projects in the ADP and the Partial Implementation Alternative, which would implement a modified, reduced program of ADP projects. The No Action Alternative is also evaluated in the Draft EIS as required by NEPA. Under the No Action Alternative, none of the ADP projects would be implemented and current conditions at the airfield would continue. Other alternatives initially considered by the Army were dismissed from detailed evaluation in the Draft EIS because they would not meet the Proposed Action’s purpose and need. These alternatives are briefly summarized in the Draft EIS.

The Full Implementation Alternative would implement all 24 projects identified in the DAAF ADP. These projects would build up to 13 new facilities, modernize seven existing facilities and demolish up to 37 existing facilities at DAAF. These projects would be implemented over approximately 30 years. The Partial Implementation Alternative would implement a modified, reduced program of ADP projects that would build up the five new facilities, modernize seven existing facilities and demolish up to 24 existing facilities at DAAF. These projects would be implemented over approximately 20 years. Selection of the Partial Implementation Alternative would not preclude later implementation of the other ADP projects not included in that alternative. Additional or supplemental environmental reviews would be conducted for those projects as necessary.

The Draft EIS analyzes the potential for the Full Implementation, Partial Implementation, and No Action Alternatives to affect the following resources: land use, aesthetics, and coastal zone management; historic and cultural resources; air quality; noise; geology, topography, and soils; water resources; biological resources; health and safety; and hazardous materials and waste. The study area for most resources is confined to the boundaries of DAAF because it is anticipated that potential effects from the alternatives would remain localized to the airfield. The analysis of some resources such as air quality and water resources includes areas outside of DAAF and Fort Belvoir, because potential effects could be experienced regionally as in the case of air quality or downstream of DAAF, such as for water resources.

Socioeconomics, utilities, airspace management, and traffic and transportation were dismissed from detailed analysis in the Draft EIS because it was determined that the Proposed Action would have no potential to affect those resources. For most resources evaluated in the Draft EIS, [the] Proposed Action would have no or less-than-significant short-term and long-term adverse effects on resources at and

around DAAF. Short-term effects are those associated with the construction of the proposed projects while long-term effects would be those that would result from the project's operation, such as emissions from a boiler or generator in the building. In some cases, the Proposed Action would have long-term beneficial effects such as on land use and the management of hazardous materials and waste at DAAF.

The Full Implementation and Partial Implementation Alternatives would have significant long-term adverse impacts on wetlands because some of the proposed ADP projects would disturb more than one acre of wetlands on DAAF. The Full Implementation Alternative would also have significant long-term adverse impacts on streams because proposed ADP projects would disturb more than 1,500 linear feet of streams on DAAF. ADP projects affecting wetlands and streams would incorporate mitigation measures to minimize or offset significant adverse impacts as much as possible. Adverse impacts on the 100-year floodplain on DAAF would be less-than-significant because any increases in the floodplain's horizontal and vertical extents resulting from the proposed ADP projects would be less than two feet.

Any adverse impacts on floodplains would be confined to Fort Belvoir, including DAAF and the largely undeveloped Southwest Area south of U.S. Route 1 or Richmond Highway. The design of the ADP projects potentially affecting the floodplain would incorporate measures to prevent or minimize downstream flooding. The Draft FONPA explains the Army's decision to implement some of the proposed ADP projects in the 100-year floodplain on DAAF.

In summary, impacts from the Full and Partial Implementation Alternatives would be less-than-significant for most resources at DAAF, with the exception of wetlands and streams, and would have some beneficial effects on land use and hazardous materials management. The implementation of the ADP projects over 20 to 30 years would help to offset or minimize adverse impacts because not all impacts would occur simultaneously.

We realize that this is a very brief overview of the ADP, the Army's Proposed Action and the findings of the Draft EIS. We encourage you to review the materials posted on Fort Belvoir's website, including the Draft EIS, Draft FONPA and the meeting materials, which provide more details about the Proposed Action, the alternatives and potential impacts on environmental resources. Your comments and questions may also help us clarify the analysis and conclusions presented in the Draft EIS.

This concludes the overview of the ADP and the Draft EIS. We thank you for your interest in the Draft EIS and for taking the time to attend today's call. I will now turn it back over to Kelly for the question and comment portion of call. Thank you.

Kelly Stoll:

Thanks Craig. As Craig mentioned, we're now ready to take comments and questions from the audience who've called in. As a reminder, this call is being recorded and your continued participation in this call indicates your consent to be recorded. Also, we will not be responding directly to comments or questions on today's call. Instead, these will be addressed appropriately in the Final EIS. Army participants will remain on the line for the entire call to hear your comments and questions. Though we will not be responding to questions and comments today, the Army welcomes and will consider all comments in developing the Final EIS. Comments and questions received today will be addressed appropriately in Final EIS. You may also submit these comments and questions via email or postal mail, which will be repeated at the end of the call.

A few notes. All comments provided during the teleconference again will be recorded, transcribed and submitted for the record in the Final EIS. Any personal information you share on the call will become part of the record. Everyone listening on the call will be able to hear your remarks. I will call on each

telephone number in the order in which they are listed. When your number is called I will unmute your line and you have three minutes to provide your comments. We will notify you when 30 seconds are remaining. And at that time you will hear me say, 30 seconds. If you do not wish to use your full three minutes, you may let us know that you would like to yield your remaining time. When three minutes have passed, I will interrupt you and your line to prepare for the next caller.

If you do not want to comment, please respond, "No comment at this time." If you are sharing a phone line with someone, please let us know before beginning your comments so we can move to the second speaker after the first is finished. If I do not get a response from a phone number, we will make note and move to the next caller. Currently we have 17 callers on the line. And with that, I will call the first number. I have XXX-XXX-7518[1]. You can press *6 on your phone to unmute yourself.

Caller 1:
No comment.

Kelly Stoll:
Thank you. Next I have XXX-XXX-5592. XXX-XXX-5592. All right. Moving on. XXX-XXX-0820. I'm going to begin by reading the last four numbers of phone numbers. So the next one I have is 0469.

Caller 2:
Thank you. No comments at this time.

Kelly Stoll:
Thank you. The next one, 2109.

Terry Clouthier:
Good afternoon. This is Terry Clouthier with the Pamunkey Indian Tribe. My email address is [caller spelled out email address[1]]. A couple of quick comments in terms of implementing this teleconference. You really need to provide more information on how to find these documents on your website because the website that came out from AECOM just points to [the Fort Belvoir Directorate of Public Works] Environmental Division. It doesn't actually tell you that you have to go under “Program and Documents” and then find it under there. It's just a little bit easier if it's not spelled out for people to find these documents.

Additionally in the AECOM email that came out the [teleconference] phone number is missing a digit. Thankfully it came up on one of the other websites to add the extra three, but it was missing a digit. And the email address is also incorrect to provide comments to this for this undertaking. So you might want to resend that out with the proper NOI as its listed as NOA before the, @usace.

The only real comment I have on the actual EIS relates to the cultural surveys done at DAAF. In particular, is there any areas within the DAAF where there's potential ground disturbing activities going to be located that have not been surveyed? If the answer to this is yes, will they be surveyed in those areas? This is particularly important to understand potential impacts to two historic properties that haven't been accounted for if they haven't been surveyed. And that's pretty much the end of my comments. Thanks. I'll yield the rest of my time. Hello?

Kelly Stoll:
Hello. We hear you.

[1] Personally identifying information such as phone numbers and email addresses are redacted from this transcript to protect caller privacy.

Terry Clouthier:
I'll yield the rest of my time.

Kelly Stoll:
The next caller is 0918. 0918. Moving on. 2872. 2872. Moving on. 4291.

Matthew Flis:
Good afternoon. My name is Matthew Flis. I'm a senior urban designer with the National Capital Planning Commission. We will be providing separate written comments and look forward to the ADP being submitted to the Commission for review pursuant to the National Capital Planning Act. Thank you.

Kelly Stoll:
Thank you. Moving on. 7706. 8728, 8728. 8682. You can use *6 to unmute.

Ross Bradford:
This is Ross Bradford, deputy general counsel at the National Trust for Historic Preservation. We own Woodlawn, which is a National Trust landmark adjacent to Fort Belvoir. My only comment is I expected this presentation to be a visual presentation online so that we could see things being explained since we're not in-person. My prior experience with these types of 106 consultations with the Fort in person would have been a normal presentation type format and not just an audio. So I would appreciate in the future when you guys conduct these to have a bit more information provided visually online so that we can follow along. Other than that, I have no comment to this time.

Kelly Stoll:
Thank you. 8782. Again, use *6 to unmute your line.

Caller 5:
Hello. No comment at this time. And I am from the Mount Vernon Council of Citizens Association. We will be responding via writing. Thank you.

Kelly Stoll:
Thank you. Next is 8188. Again, *6 to unmute. 8188. Moving on. The next on our list and last that I have on our list is 6347. 6347. *6 to unmute. We have about 20 minutes left. If there is anyone who would like to make a comment, please use *6 to unmute your line.

Laura Arseneau:
This is Laura Arseneau with Fairfax County Department of Planning and Development. I'm sorry, I'm a little late to the meetings. I might not be on the list of phone numbers. But I'm with the Heritage Resources Branch, and just my only comment. We will be submitting written comments. And my only comment is that the proposed APE is located in two of the county's historic overlay districts and we would recommend that the Architectural Review Board and that the County Heritage Resources staff be considered two different entities because they don't necessarily speak on behalf of each other. But we'll be submitting that in other comments as well.

Kelly Stoll:
Great. Thank you. Are there any others who'd like to make a comment? If we have not called your number we will be on the line until 3:00. If you'd like to make a comment, please use *6. All right. While we're waiting, I will repeat the email and the postal address for those who may have joined late and did not hear it. The email address is FortBelvoirNOI@usace.Army.mil. I'll spell the beginning, F-O-R-T-B-E-L-V-O-I-R-N-O-I-@-U-S-A-C-E.Army.mil. And the mailing address is U.S. Army Fort Belvoir, Directorate of Public Works. Next line. Attention, DAAF Draft EIS. Next line. Environmental Division Chief. Next line.

9430 Jackson Loop Building 1442, Room 230. Again, 9430 Jackson Loop Building 1442, Room 230. Last line, Fort Belvoir, Virginia, 22060-5116. Again, I'll open it up for questions or comments. If you have a question or comment please use *6 to unmute your line.

(silence)

We'll be presenting our presentation at the top of the hour, taking comments and questions thereafter. Again, Army officials, project officials remain on the line to hear your comments. If you'd like to make one now, please use *6 to unmute your line.

(silence)

David Howlett:
Yes. Hello. Am I off mute?

Kelly Stoll:
Nope, you are not on mute.

David Howlett:
Thank you very much. I've been on for a while and listened to the previous comments, but I couldn't take myself off mute. So I called back on another number. And my name is David Howlett and I'm calling in my capacity as a government employee at Fort Belvoir and I have read the Draft EIS. One of my issues before I read it was, do we really have to take away the Anderson picnic area land that needs to be converted to the airfield use? And I just wanted to say after reading the purpose and need section of the EIS, it's easily understandable why the buildings have to be taken away from the airfield. So, I think the EIS really did a very good job of explaining why the project needed to be done in addition to identifying the impacts from it, including what I call the Anderson picnic area, where units go and have a picnic. So, thank you for the opportunity to comment on that.

Kelly Stoll:
Thank you. Is there anyone else on the line who has not commented yet, who would like to please use *6 to unmute.

Ok. If you'd like to make a comment or have questions, please press *6 to unmute. We will go through the presentation again at the top of the hour.

[*There were no further comments. The presentation was repeated at 2:00 PM EST in a similar manner as transcribed above. No comments were received after the second presentation. The call ended at 3:00 PM EST*.]

*****End of transcript*****

TRANSCRIPT
Public Meeting
Davison Army Airfield Area Development Plan
Draft Environmental Impact Statement
August 24, 2020 – 6:00 PM to 8:00 PM

Kelly Stoll:
Good evening. I'm Kelly Stoll and I'll be the facilitator for this evening's call. The call is being recorded, so if you have any issue with that, please let us know, or we'll go over in just a few moments, how to submit comments via email or mail.

While we would have liked to have been with you in-person, in light of a recent COVID restrictions, we're holding this teleconference in lieu of the traditional in-person public meeting to provide you, the public, with the opportunity to hear and ask questions about the Army's Proposed Action to implement an Area Development Plan or ADP at Davison Army Airfield, or DAAF, or DAAF on U.S. Army Garrison Fort Belvoir in Fairfax County, Virginia. Projects in the ADP will provide DAAF with facilities and infrastructure needed to support its mission over the next 30 years.

Today's call is being held during the 45-day comment period for the Draft Environmental Impact Statement or Draft EIS that the Army has prepared to analyze the potential environmental effects from implementing the proposed ADP projects. The public comment period began on July 24th, and will end on September 8th. The Draft EIS has been prepared in accordance with the National Environmental Policy Act, or NEPA, which is the primary public law that requires agencies to consider the effects of their actions on the environment. NEPA includes requirements for the public to be involved in the federal decision-making process and be provided with opportunities to comment on proposed federal actions. Today's meeting is such an opportunity.

Today's meetings are also an opportunity for the public to comment on projects in the DAAF ADP that would potentially affect the 100-year floodplain at DAAF. The Army has prepared a Finding of No Practicable Alternative, or FONPA, in accordance with Executive Order 11988 to explain its decision to implement projects in the floodplain at DAAF.

Finally, today's meetings are also an opportunity for public to comment on the Proposed Action's potential effects on historic and cultural resources in accordance with section 106 of the National Historic Preservation Act.

Two meetings were held today. This call here at 6:00 PM and one earlier today at 1:00 PM. The format and content is exactly the same for each meeting. Although we will be taking comments and questions from the audience, we will not be responding directly to questions or comments. All questions and comments received today will be addressed appropriately in the Final EIS, which is expected to be completed in 2021.

In a few minutes, we'll review the administrative rules for providing today's comments. And this call is scheduled from 6:00 PM to 8:00 PM. The project team includes military and civilian personnel from Fort Belvoir, Davison Airfield, Military District Washington, and the U.S. Army Corps of Engineers. The project team also includes staff from the Army's contractors for the ADP and EIS, Bluestone Environmental and AECOM.

Now I will review the meeting format. Again, this meeting is audio only, and there is no video or visual component. To remind everyone, this call is being recorded to maintain a record of the discussion and

the comments and questions received during the meeting. Your participation in this call indicates your consent to be recorded. The meeting will consist of an overview of the DAAF ADP and Draft EIS followed by a timed question and comment period.

Procedures for providing a comment or question during the meeting are as follows. All callers will be muted upon entering the call. Each caller will be addressed by the last four digits of their phone number and will be unmuted for three minutes to state their comment or question. I will provide a 30-second warning before your time ends. When your phone number is called, please state your name, affiliation, if any, and contact information, phone, or email. Please listen closely for your number to be called. If you are a member of the general public and wish to remain anonymous, please say so before stating your comment or question. If you do not wish to comment, please respond "No comment at this time."

The Army will review comments and questions received during the 45-day EIS public comment period. Substantive comments will be addressed in the Final EIS. The Final EIS is expected to be issued next year. The Army's selected alternative for implementing the DAAF ADP will be codified in a Record of Decision or ROD, which will be issued following the Final EIS.

If you do not comment during today's call, or you wish to submit additional comments later, you may send them via email or postal service to fortbelvoirnoi@usace.army.mil. That's fortbelvoirnoi@usace.army.mil.

The mailing address is, U.S. Army Fort Belvoir Directorate of Public Works, Attention DAAF Draft EIS, Environmental Division Chief, 9430 Jackson Loop, Building 1442, Room 230, Fort Belvoir, Virginia, 22060-5116.

The comment period ends September 8th. The Draft EIS and related documents, including posters and fact sheets for today's meeting and the Draft FONPA are posted for public review and download on the Fort Belvoir Environmental Division website. You can find the draft materials by typing "Fort Belvoir Environmental Division" into your browser. Once at the website, click "Programs and Documents" and select "National Environmental Policy Act/NEPA Programs." The DAAF ADP Draft EIS is the first entry under "Open for Public/Agency Review and Comment." A presentation with the major discussion points from this meeting will also be posted to Fort Belvoir's website with other Draft EIS materials, shortly after this meeting.

Next, we'll begin today's presentation with some opening remarks from Lieutenant Colonel Beau Ashley, who is the Deputy Commander of the Army Brigade at Davison Airfield. Sir.

Lieutenant Colonel Beau Ashley:
Thanks Kelly. Hey. Good evening everyone. My name is Lieutenant Colonel Beau Ashley. I'm the acting Commander of the U.S. Army Aviation Brigade. Our headquarters is located here at Davison Army Airfield. I want to thank everyone for calling in this evening. The purpose of the call-in with a virtual telephone meeting is to offer the public another opportunity to provide comments on the Draft Environmental Impact Statement or EIS for the Fort Belvoir Davison Army Airfield Area Development Plan.

Given the current state of the COVID-19 virus, ensuring the health and safety of the public is of the utmost concern. So, we converted what would normally be an in-person meeting to a call-in format so we can provide the public an opportunity to comment on the Draft EIS in a safe manner.

The Draft EIS is available to the public on the Fort Belvoir website, which is located in the public register and is in a newspaper and also social media. In addition to the 24 August virtual meetings, there are several avenues for comment, including email and hard copy through the U.S. mail system. The 45-day comment period is open through 8th September. We welcome your comments, questions, and

concerns. Our team has spent over two years working on this document to ensure our analysis provides factual details and considerations for impact to the environment. Thanks.

Kelly Stoll:
Thank you, sir. We'll continue the meeting with a brief overview of the DAAF ADP and the Draft EIS by Craig Carver, who's one of the consultants who assisted the U.S. Army Corps of Engineers with the preparation of the Draft EIS. Craig.

Craig Carver:
Thank you, Kelly. Good evening, everyone. Thank you for joining us on this evening's call, for taking the time out of your schedule to be with us tonight. Again, my name is Craig Carver. I'm an environmental specialist with AECOM, which was one of the consulting firms that is assisting the U.S. Army Corps of Engineers with the preparation of the Draft EIS. The Corps of Engineers has prepared the Draft ADP and the Draft EIS on behalf of the Military District of Washington or MDW, which operates DAAF. Fort Belvoir owns and maintains the buildings, infrastructure, and underlying land at DAAF.

Again, thank you for taking the time to join us. We're conducting these meetings virtually as Lieutenant Colonel Ashley just remarked, and trying to make as much information publicly available as we can to provide transparency for the Proposed Action and encourage public involvement and participation in the spirit of NEPA.

We look forward to your comments this evening and questions about the Proposed Action and assure you that they will be addressed appropriately in the Final EIS document which, as Kelly mentioned earlier, is expected to be issued sometime next year in 2021. As mentioned earlier, the Draft EIS is currently available for a 45-day public review and comment period. This includes members of the general public, as well as federal state, and local regulatory agencies, nongovernmental organizations, and anyone else with an interest in the Proposed Action at DAAF.

The 45-day public review period began on July 24th, 2020, and will end on September 8th, 2020, which is the day after Labor Day. The Draft EIS and associated materials are also available on the Fort Belvoir Environmental Division Website. And comments can be submitted during this call as well as by email or traditional U.S. Postal Service mail. The email and U.S. Postal Service addresses are available in the meeting materials on Fort Belvoir's website. And they will be repeated again at the end of this presentation. I'll begin the overview of the Army's Proposed Action, alternatives for the Proposed Action, and a summary of the Draft EIS findings. First, a brief overview of DAAF.

Davison Army Airfield, or DAAF covers approximately 350 acres on Fort Belvoir's North Post at the intersection of U.S. Route 1, also known as Richmond Highway and the Fairfax County Parkway in eastern Fairfax County. DAAF has operated since 1951. The airfield is home to multiple Department of Defense tenants with aviation missions, including The Army Aviation Brigade or TAAB, the 12th Aviation Battalion and the Civil Air Patrol among others. These tenant missions are critical to the airfield's location near Washington, D.C. and within the National Capital Region, also known as the NCR.

The current conditions of DAAF include 65 percent of the buildings at the airfield that are more than 30 years old and 40 percent of the existing buildings are 50 years or older. Multiple facilities are past their intended life cycle and are obsolete, undersized and/or inefficient. Several DAAF facilities are also within safety zones associated with the airfield's runway. These safety zones are designated by the Department of Defense and the Federal Aviation Administration or FAA. The facilities in these zones require temporary safety waivers to operate.

The Army's Proposed Action is to implement multiple construction, demolition, modernization, and infrastructure projects that are recommended in the DAAF ADP. These projects are intended to provide DAAF tenants with the facilities and infrastructure needed to support their missions. Department of Defense regulations require the preparation of ADPs for discreet or identifiable planning districts on military installations such as an airfield like DAAF. The DAAF ADP will provide site planning direction of the airfield for the next 30 years and would be consistent with Fort Belvoir Real Property Master Plan, which was updated in 2015. Projects in the DAAF ADP will replace outdated and inefficient facilities and improve safety at the airfield. All of the ADP projects would be implemented within the existing boundaries of DAAF and the acquisition of additional land would not be required. The ADP does not include substantial changes in missions, air operations, or the number of aircraft and personnel at DAAF.

As stated in the Draft EIS, the purpose of the Proposed Action is to provide DAAF with an ADP consistent with the airfield vision of creating a safe, secure, sustainable, consolidated aviation complex that allows for mission growth and provides multiple services in a compact campus. This is the vision statement that was developed during planning meetings conducted at DAAF during development of the ADP. Fulfilling this vision statement would include upgrading and replacing an aging, undersized, inadequate and inefficiently laid out physical infrastructure to allow DAAF to fully support its tenants' ongoing missions and remove buildings with obstructions from the airfield safety zones that require temporary safety waivers to operate. The Proposed Action is needed because DAAF facilities are aging or obsolete, inadequately sized, inappropriately sited, and do not adequately support ongoing missions.

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The analysis of some resources such as air quality and water resources includes areas outside of DAAF and Fort Belvoir because potential effects could be experienced regionally, such as in the case of air quality or downstream of DAAF, such as for water resources. Socioeconomics, utilities, airspace management, and traffic and transportation are resources that were dismissed from detailed analysis in

the Draft EIS because it was determined that the Proposed Action would have no potential to affect those resources. For most resources evaluated in the Draft EIS, the Proposed Action would have no, or less-than-significant short-term and long-term adverse effects on resources at and around DAAF. Short-term effects are those associated with the construction of a proposed project, and long-term effects would be those that would result from the projects' operation such as emissions from a boiler or generator in a new building. In some cases, the Proposed Action would have some long-term beneficial effects such as on land use and the management of hazardous materials and waste at the airfield.

The Full implementation and Partial Implementation Alternatives would have significant long-term adverse impacts on wetlands because some of the proposed ADP projects would disturb more than one acre of wetlands on DAAF. The Full Implementation Alternative would also have significant long-term adverse impacts on streams because proposed ADP projects would disturb more than 1,500 linear feet of streams on DAAF. ADP projects affecting wetlands and streams would incorporate mitigation measures to minimize or offset significant adverse impacts as much as possible. Adverse impacts on the 100-year floodplain on DAAF would be less-than-significant because any increases in the floodplain's horizontal and vertical extents resulting from the proposed ADP projects would be less than two feet. Any adverse impacts on floodplains would be confined to Fort Belvoir, including DAAF and the largely undeveloped Southwest Area, south of U.S. Route 1, or Richmond highway. The design of ADP projects potentially affecting the floodplain would incorporate measures to prevent or minimize downstream flooding. The Draft FONPA explains the Army's decision to implement some of the proposed ADP projects in the 100-year floodplain on DAAF.

In summary, impacts from the Full and Partial Implementation Alternatives would be less-than-significant for most resources at DAAF with the exception of wetlands and streams, and would have some beneficial effects on land use and hazardous materials' management. The implementation of the ADP projects over 20 to 30 years would help to offset or minimize adverse impacts because not all impacts would occur simultaneously.

We realize that this is a very brief overview of the ADP, the Army's Proposed Action and the findings of the Draft EIS. We encourage you to review the materials posted on Fort Belvoir's website, including the Draft EIS, Draft FONPA and the meeting materials, which provide more details about the Proposed Action, alternatives, and potential impacts on environmental resources. Your comments and questions may also help us clarify the analysis and conclusions presented in the Draft EIS.

This concludes the overview of the ADP and the Draft EIS. We thank you for your interest in the Draft EIS and for taking the time to attend today's call. I'll now turn it back over to Kelly for the question and comment portion of call. Thank you.

Kelly Stoll:

Thanks Craig. We're now ready to take comments and questions from the audience members who've called in. As reminder, this call is being recorded and your continued participation in the call indicates your consent to be recorded. Also, we will not be responding directly to comments and questions on today's call. Instead, these comments and questions will be addressed appropriately in the Final EIS. Army participants will remain on the line for the entire call to hear your comments and questions. Though, they will not respond to questions and comments today, the Army does welcome your comments and we will consider all comments developing the EIS.

Comments and questions received today will be addressed, as I mentioned, appropriately in the Final EIS. You may also submit your questions via email or U.S. mail, and I'll repeat that information at the end of the call.

All comments provided during this teleconference will be recorded, transcribed and submitted to the record for the Final EIS. Any personal information you share on the call will be public. Everyone listening to the call will be able to hear your comments. I will call out each phone number in the order in which they are listed. When your number is called, please press *6 to unmute your phone. Each speaker will have three minutes to provide their comments. I'll notify you with 30 seconds remaining. At that time, you will hear me say “30 seconds.” If you do not wish to use your full three minutes, you may also yield that time. When three minutes have passed, I will interrupt and mute your line to prepare for the next caller. If you do not wish to comment, please respond, "No comment at this time."

If you are sharing a phone line with someone and both individuals would like to make comment, please let us know before we move, at the beginning of your comment, so we can get both speakers on the line. If we get no response from your phone number, we'll make a note and attempt to recall you after all numbers had the opportunity to comment.

Currently, we have two folks in line. The first one is 3542. Whoever that was, just muted yourself. Push *6 again.

Caller 1:
No comment at this time.

Kelly Stoll:
Thank you. The next caller is 3307. 3307.

Dale Rumberger:
Dale Rumberger, president South County Federation. I'm just confirming that what I heard was that there would be no expansion of flight operations greater than what they are currently, that no additional land would be needed outside of the current zone that the 350 acres that DAAF has operated on since 1951. I think that might be important to know the kind of aircraft that would be there. Since the Ospreys have been coming over, there's quite a bit of noise that's pretty loud. So I think we probably would need to know a little bit more about the kind... Not specific operations, that's none of our business, but to know [inaudible 00:27:19] the general region here, the flight paths and the number of aircraft coming over that.

When you mentioned 1,500 linear [feet of] streams, the mitigation measures for that... Mitigation measures could be explained a little better as far as that stream channelization, what exactly does that entail? Thank you for your time.

Kelly Stoll:
Thank you. At this point, those are the only two participants we have who would provide comments. I'll go over again the email address as well as the postal address for mailing additional comments or questions. The email address is fortbelvoirnoi@usace.army.mil.

The mailing address is, U.S. Army Fort Belvoir Directorate of Public Works, Attention DAAF Draft EIS, Environmental Division Chief 9430, Jackson loop, building 1442, Room 230, Fort Belvoir, Virginia, 22060-5116.

I'll also go over again where you can find the information on the internet on Fort Belvoir's website. Simply type in “Fort Belvoir Environmental Division” into any web browser. Once at the website, click “Programs and Documents,” select “National Environmental Policy Act” or NEPA, and the DAAF ADP Draft EIS is the first entry under “Open for Public/Agency Review and Comment.”

We'll leave the line open. If there are any other comments, please use *6 to unmute yourself. Again, if you'd like to make your comment, please use star six to unmute.

Dale Rumberger:
Hi, this is Dale Rumberger, president of South County Federation. I spoke once before. I think it would be important that in the EIS you include the population expansion since 1951, when the base was first founded. Davison Army Airfield, of course, being first founded and not the base. And I think also perhaps because there is noise as one of the areas that you are looking at, as well as the historical resources in the area, and since you're looking at noise as one of the categories, I think it would be important to look at noise patterns as well. And perhaps charts on a percentage of flights in certain directions, might be the time for us to really press hard because I know there've been several other groups that have spoken to the congressional representatives, the FIA representatives about the flights out of DAAF.

And that might be the time for us to see if it's possible to direct as many of those flights over the Fort and then on up the Potomac River and then breaking off their direction rather than over the vastly expanded neighborhood area that was not here in 1951, but it's most definitely here now and continuing to grow and expand. I just think that might be something worthy of discussions and some kind of charting of number and, maybe not kinds of flights, but numbers of flights, frequency of flights, et cetera. It was originally just rotary wing aircraft and now it has expanded in number and kind.

This morning, I can tell you, at 10:11 this morning, there were two helicopters, one over maybe 500 feet, maybe. Those are the complaints, those are the things people hear about... Hearing that in the Environmental Impact Statement that there is no expansion of the runway, no other expansion or increase in flight operations plan, that you're merely replacing aged structures, which you obviously need to do, I think is a win for the base and could be very strong support component out of the community. But I do think we have to address the fact that whatever happens at DAAF will have some kind of impact on the noise in the area and that local communities would like to have it on record that we take all the mitigation factors we can there. If we're looking at 1,500 linear feet of streams mitigation measures, we need to be looking at noise levels as wellbeing mitigated over these expanding neighborhoods. Thank you.

Kelly Stoll:
Thank you.

[*No further comments were received. The presentation was not repeated because no new callers joined the meeting. The meeting ended at 7:50 PM EST*.]

*****End of transcript*****

Welcome



Helicopter static display at DAAF

What is the purpose of this meeng?

The U.S. Army is hosting this meeting to present information gathered during the preparation of the Draft Environmental Impact Statement (EIS) and to request your comments about the proposed implementation of several projects at Davison Army Airfield (DAAF). DAAF is part of Fort Belvoir. To comply with the National Environmental Policy Act of 1969 (NEPA), the Army has prepared a Draft EIS to analyze the potential impacts of this proposed action.

Public Participation

This is your opportunity to comment on the Draft EIS ands its findings on the impacts of implementing the Area Development Plan (ADP) at DAAF.

What does the Army's proposed acon includeạ?

Under the proposed action, the Army would implement the facility and infrastructure improvement projects identified in DAAF's recently updated Area Development Plan (ADP). Those projects are intended to better support the ongoing and future mission requirements of DAAF's tenants. The ADP projects would be implemented over the next 30 years. Additional information about the DAAF ADP and the proposed projects is available at this meeting.

What will tonight's meeng cover?

- The Army's proposed action to implement the projects in the DAAF ADP
- The NEPA and EIS process
- How to comment on the proposed action and its potential impacts
- The Draft EIS findings

By commenting on the proposed action, you are helping the Army prepare a better EIS.

What is NEPA?

NEPA is the national charter for responsible management of the environment. Under NEPA, all federal agencies must analyze the potential environmental impacts of major proposed actions. NEPA also requires federal agencies to provide the public with opportunities to comment on proposed actions. More information about the NEPA process is available at tonight's meeting.

Is this meeng my only chance to comment?

This meeting is part of a 45-day review period of the Draft EIS that started on **July 24, 2020** and will continue through **September 8, 2020**. You can provide comments during this entire period.

How to comment

During public teleconferences to be held on **August 24, 2020**.

To join a teleconference, dial **1-877-286-5733** (toll free) and enter the passcode when prompted:

- **Teleconference 1:** 1-3:00 PM; Passcode 676-543-300#
- **Teleconference 2:** 6-8:00 PM; Passcode 668-662-26#

Each teleconference will have the same format and content.

During the entire review period:

By mail to:

US Army Fort Belvoir Directorate of Public Works
Attn.: DAAF Draft EIS
Environmental Division, Chief
9430 Jackson Loop, Building 1442, Rm #230
Fort Belvoir, VA 22060-5116

By email at: FortBelvoirNOI@usace.army.mil

Information is available online at: https://home.army.mil/belvoir/index.php/about/Garrison/directorate-public-works/environmental-division

All comments must be sent no later than **September 8, 2020**.

Will I get a response to my comment?

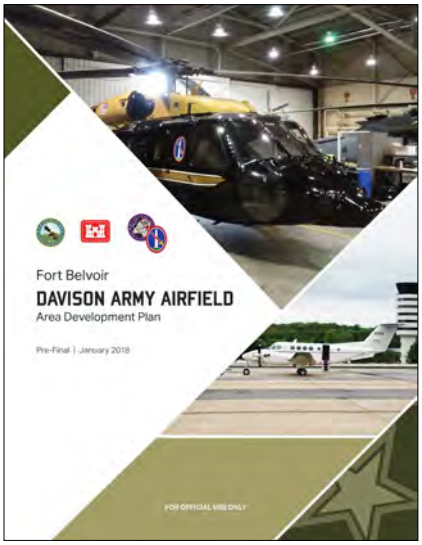
Comments received on the DEIS will be addressed in the Final EIS (FEIS). The FEIS will be available for public review for 30 days. The Army's Record of Decision (ROD) will be published following the 30-day FEIS public review period.

Proposed Action

What is being proposed?

The Army's proposed action is to implement projects in the Davison Army Airfield (DAAF) Area Development Plan (ADP). DAAF is located on Fort Belvoir's North Post and is operated by U.S. Army Military District Washington (MDW). The ADP consists of multiple projects to improve facilities and infrastructure at DAAF. These projects are intended to better support the ongoing and future missions of DAAF's tenants and would be implemented over the next 30 years.

What is an ADP?



An ADP provides site planning direction for a specific area of a military installation. Department of Defense (DoD) regulations require all U.S. military installations to prepare ADPs for districts within their boundaries that are identifiable and connected based on distinctive features, such as land use or geographical characteristics. DAAF is identified as such a district in the Fort Belvoir Real Property Master Plan (RPMP), which was last updated in 2016.

Environmental impacts that would potentially result from implementing projects in the ADP are assessed in the Draft Environmental Impact Statement (EIS) that the Army has prepared in accordance with the National Environmental Policy Act of 1969 (NEPA).

Why is the proposed action needed?

- Many facilities at DAAF were built in the 1950s, 1960s, and 1970s and are now outdated and undersized for current operational requirements.
- The layout of DAAF's buildings is inefficient, resulting in spread-out operations, conflicting movements of helicopters and planes, and the need for multiple runway crossings.
- Several DAAF facilities are located within the Primary and Transitional safety surfaces associated with the airfield's runway. These surfaces are intended to ensure the safety of pilots and aircraft, and should not contain any structures. Temporary waivers are required for the continued operation of facilities within the safety surfaces. It is essential to DAAF's successful continued operation that these facilities within the safety surfaces be removed and the need for waivers eliminated.

The purpose of the proposed action is to provide DAAF with physical infrastructure that fulfills the vision of creating "*a safe, secure, sustainable, consolidated aviation complex that allows for mission growth and provides multiple services in a compact campus*."

What kinds of projects are in the proposed action?

- Construction of several new buildings, primarily aircraft hangars and aircraft maintenance facilities
- Renovation and/or expansion of selected hangars, maintenance facilities, and office / administrative buildings
- Demolition of several older buildings (following the relocation of their occupants)
- Infrastructure improvement projects, such as the realignment of the airfield perimeter road, construction of a new main entry gate, and expansion of aircraft parking aprons

The proposed action does not include, nor would it require, substantial changes in missions, air operations, or the number of aircraft and personnel at DAAF.

Where would the proposed action occur?

All of the projects in the proposed action would occur within the current boundaries of DAAF and Fort Belvoir; the acquisition of additional land is NOT proposed.

Most of the projects would occur in previously developed areas of DAAF; however, some projects would require clearing areas that are currently wooded or otherwise vegetated.

The proposed action would have effects on the 100-year floodplain associated with Accotink Creek, which covers a substantial part of DAAF, and on wetlands. One of the proposed projects would require using part of Anderson Park, a Fort Belvoir recreational resource adjacent to DAAF, to construct a new parking lot.

Davison Army Airfield (DAAF)

Davison Army Airfield (DAAF) is part of Fort Belvoir's North Post and covers approximately 348 acres. It is located west of Fairfax County Parkway, between U.S. Route 1 to the south and Telegraph Road to the north.

Under the command of U.S. Army Military District Washington (MDW), DAAF has been in continuous use since it was built in the 1950s and currently hosts five tenants:

The Army Aviation Brigade Headquarters (TAAB): TAAB provides fixed and rotary wing aviation and engineer technical rescue capability; aviation, airfield and air traffic control mission command; and multi-component world-wide executive and non-executive airlift support to Headquarters Department of the Army and Joint Force Headquarters – National Capital Region/US Army Military District of Washington (JFHQ-NCR/USAMDW) to support JFHQ-NCR's Homeland Defense and Defense Support of Civil Authorities Contingency Plans in order to defend and secure the NCR.

TAAB Subordinate Units

Airfield Division: The Airfield Division conducts continuous airfield operations in support of DAAF users to provide a safe, controlled, and efficient airfield environment.

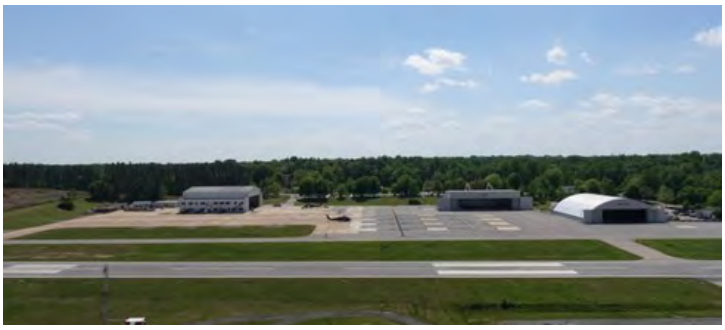
12th Aviation Battalion (12th AV BN): The 12th AV BN provides aerial mission command support, limited air assault, air movement and technical rescue for Headquarters Department of the Army (HQDA) and Joint Force Headquarters - National Capitol Region/MDW.

Operational Support Airlift Activity (OSA-A / OSACOM): OSA-A / OSACOM oversees management and execution of the total Army Non-Executive Operational Support Airlift (OSA) program.

Night Vision and Electronic Sensor Directorate (NVESD): NVESD supports the Warfighter in the field; develops electronic sensor systems for Unmanned Aircraft Systems, rotary, and fixed wing aircraft; transitions mature technologies to various Program Executive Offices and other Army organizations; and provides technical support to equipment acquisition and user communities.



Building 3232, C Company Hangar


DAAF viewed from Flight Control Tower

District of Columbia Army National Guard (DCARNG): The DCARNG provides aviation training and maintenance support for assigned aviation units; contingency Medical Evacuation (MEDEVAC) support for first responders; counterdrug surveillance; Very Important Person (VIP) transport; Reserve Officers' Training Corps (ROTC) airlift for Howard, George Mason, and Georgetown universities; patient transfer for Fort Belvoir Community Hospital; and DCARNG F-16 combat survival training.

Civil Air Patrol (CAP): CAP is the civilian auxiliary unit of the United States Air Force and fulfills three congressionally assigned missions: emergency services (search and rescue) and disaster relief operations; aerospace education for youth and the general public; and cadet programs for teenage youth.

Fire and Emergency Services (FES): FES is the first responder to fires, public safety, and medical emergencies at DAAF and ensures the safety and welfare of personnel through preservation of life, health, property, and the environment.

DAAF's tenants use and occupy buildings that include several aircraft maintenance hangars; operations / administrative facilities; a flight control tower; and a fire station. Many buildings at DAAF were built in the 1950s, 1960s, and 1970s.

DAAF has one runway as well as adjacent taxiways, aircraft parking aprons, and a helipad. An average of 150 aircraft take off and land daily in fulfillment of the airfield's mission of transporting passengers and freight for the Army and Department of Defense to, from, and within the National Capital Region; and for training and testing operations.

Approximately 50 aircraft are permanently stationed at DAAF. These aircraft consist of helicopters and small planes, including:

- VH-60 / UH-60 / EH-60 Black Hawk
- Cessna 172/182
- C-26 Metroliner
- UH-72 Lakota
- DHC-6 Twin Otter
- Beechcraft C-12 Huron
- UC-35 Citation

In addition to its buildings, runway, and other facilities, DAAF has extensive vegetated and undeveloped areas including Accotink Creek, which flows to the east of and approximately parallel to the airfield's runway, wetlands, and wooded areas.

National Environmental Policy Act (NEPA)

In 1969, Congress passed the National Environmental Policy Act (NEPA), the national charter for responsible management of the environment. Under NEPA, all branches of the federal government must consider the potential environmental impacts of their major proposed actions.

The process for considering the impacts of a major federal proposed action is through the preparation of an environmental impact statement (EIS). An EIS is a document that analyzes and describes the positive and negative environmental effects of a proposed action and considers reasonable alternatives to the proposed action. Preparation of an EIS also provides an opportunity for the public to learn about and comment on federal actions that may affect their communities.

The findings of the EIS are taken into account by the proposing federal agency when making a decision on which alternative to implement.

How is an EIS prepared?

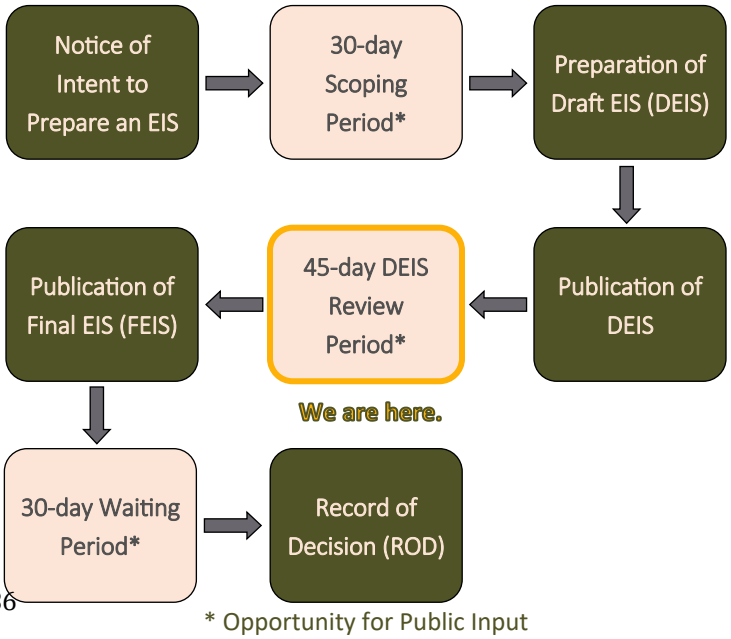
A typical EIS involves the following steps:

- **Publication of a Notice of Intent (NOI) to prepare an EIS:** this is the formal beginning of the EIS process. The NOI provides a general description of the proposed action and alternatives. By law, the NOI is published in the *Federal Register*. A shorter version of the NOI may also be published in local newspapers.
- **Scoping:** the NOI kicks off a "scoping period" during which government agencies and the public can review the proposed action and provide comments. These comments help determine the range of issues (the "scope") that will be considered in the EIS. The scoping period generally lasts for 30 days and often includes a public scoping meeting.
- **Preparation of the Draft EIS (DEIS):** after scoping is finished, a DEIS is prepared by an interdisciplinary team of environmental professionals. The DEIS describes the proposed action, the alternatives being considered, and the potential impacts on the environment, both natural (water, vegetation, wildlife, etc.) and human-made (land use, traffic, community resources, etc.).
- **Review of the DEIS:** once complete, the DEIS is made available for review and comment by government agencies and the public. The availability of the DEIS for public review is announced in the *Federal* Register and local newspapers. The DEIS review period lasts for at least 45 days.
- **Preparation of the Final EIS (FEIS):** after the 45-day DEIS review period, comments on the DEIS are analyzed and an FEIS is prepared. The FEIS incorporates and responds to comments received on the DEIS.
- **Publication of the FEIS:** the FEIS is made available to the public for a 30-day waiting period during which additional comments may be submitted.
- **Record of Decision (ROD):** after the 30-day FEIS waiting period, a ROD can be issued by the proposing agency. The proposing agency issues a ROD to announce and explain its decision after having considered the findings of the EIS and the comments received. The proposed action analyzed in the EIS may not begin until the proposing agency has completed the EIS process and issued the ROD.

What is the EIS process for the DAAF ADP ?

The preparation of the DAAF ADP EIS will follow the typical process described above and illustrated below. Opportunities for your participation throughout the process are indicated with an asterisk (*). Today's meeting is part of the 45-day Draft EIS public review period. We encourage you to find out more about the project, ask questions, and most importantly, let us know of any concerns or issues you would like to see addressed in the EIS. Please see the "How to Comment" station and the "Welcome" fact sheet for information on how to provide us with your comments.

DAAF ADP EIS Process



* Opportunity for Public Input

Draft EIS Alternatives

The National Environmental Policy Act (NEPA) requires federal agencies to analyze reasonable alternatives to their proposed actions. Consistent with this requirement, the Draft Environmental Impact Statement (EIS) for the Davison Army Airfield (DAAF) Area Development Plan (ADP) analyzes the following three alternatives:

- **Full Implementation Alternative.** All projects in the DAAF ADP would be implemented.
- **Partial Implementation Alternative.** A modified, reduced program of ADP projects would be implemented.
- **No Action Alternative.** None of the proposed ADP projects would be implemented. Current conditions at DAAF would continue for the foreseeable future.

NEPA requires analysis of the No Action Alternative in an EIS to provide a baseline against which the impacts of a proposed action can be compared.

Table 1 shows the individual ADP projects that are included in the Full ADP Implementation and Partial ADP Implementation Alternatives.

Table 1—DAAF ADP Projects

Project No.*	Project	Full Impl. Alternaveạ	Paraḷ Impl. Alternaveạ
Short-Range ADP Projects (1 to 10 years)			
1	Modernize Building 3121, DCARNG Airfield Operations Section	•	•
2	Modernize Building 3145, OSA-A/ OSACOM Hangar	•	•
3	Modernize Building 3151, 12th AV BN D Company Hangar	•	•
4	Modernize Building 3232, 12th AV BN C Company Hangar	•	•
5	Realign Santjer Road and Gavin Road	•	•
6	Construct 12th AV BN 8-Bay Aircraft Maintenance Hangar	•	•
7	Construct North Taxiway Connection	•	•
8	Remove Earthen Knoll	•	•
9	Construct Runway Safety Overrun	•	•
Mid-Range ADP Projects (11 to 20 years)			
10	Modernize and Expand Building 3146	•	•
11	Construct 12th AV BN 10-Bay Storage Hangar	•	
12	Construct 12th AV BN 4-Bay Storage Hangar and Secondary Parking Lot	•	
13	Construct 12th AV BN Aircraft Paint Shop	•	
14	Modernize and Expand Building 3212, DCARNG Readiness Center	•	•
15	Construct DCARNG Aircraft Wash Rack	•	•
16	Modernize Building 3165, OSA-A/ OSACOM Operations Facility	•	•
17	Relocate NVESD	•	•
18	Expand Aircraft Parking Apron	•	•
Long-Range ADP Project (21 to 30 years)			
19	Replace Farrar Gate Access Control Point and Install Redundant Communications Line	•	
20	Construct NVESD Hangar	•	
21	Construct OSA-A / OSACOM Operational Flight Division Hangar	•	
22	Construct OSA-A/OSACOM Operations Facility	•	
23	Construct Perimeter Road Multi-purpose Trail	•	
24	Construct Alterna. ve Perimeter Road	•	

*Numbers correspond to numbers on the Full Implementation Alternave and Partial Implementation Alternative display boards.
12th AV BN = 12th Aviation Baa lion
ACP = access control point
DCARNG = District of Columbia Army National Guard
Impl. = implementaon
NVESD = Night Vision and Electronic Sensors Directorate
OSA-A/OSACOM = Opera onal Support Airlift Activity/Operational Support Airlift Command

All of the proposed projects would occur within the current boundaries of DAAF; acquisition of additional land is NOT proposed.

Up to 37 DAAF buildings would be demolished under the Full Implementation Alternative and up to 24 buildings would be demolished under the Partial Implementation Alternative. These demolitions would remove facilities that would be vacant or redundant once the proposed projects are completed.

The Full and Partial Implementation Alternatives would have *significant adverse impacts* on wetlands at DAAF. Impacts on other resources would be less than significant.

DAAF Wetlands, Resource Protection Areas, and Floodplains

Wetlands and Streams

Wetlands are temporarily or permanently saturated and inundated areas that serve a variety of functions including flood control, groundwater replenishment, wildlife habitat, recreaon , and water quality control. Wetlands cover an esmated 1,250 acres on Fort Belvoir's Main Post, including 192 acres on DAAF (see **Figure 1**). Wetlands on Fort Belvoir are typically idenfied through field surveys prior to implemenn g projects with poten al wetland impacts. Approximately 3 acres of wetlands on DAAF were delineated in support of the DAAF ADP and EIS.

Projects in the Proposed Acon would collecvely impact approximately 3.6 acres of wetlands and 2,026 linear feet of streams on DAAF, resulng in a ***significant adverse impact*** on these resources. As part of the EIS, the Army has prepared a Finding of No Pracca ble Alternave (FONPA) in accordance with EO 11990 to explain its decision to implement the Proposed Aco n in wetlands.

Prior to implemenn g the proposed projects, the Army would obtain permits from USACE as well as authorizations from the Virginia Department of Environmental Quality (VDEQ) and Virginia Marine Resources Commission (VMRC), and would adhere to applicable mi gaon measures specified by those agencies. Implemenng the projects over approximately 30 years would also help to minimize impacts.

Executive Order 11990

Executive Order (EO) 11990, *Protection of Wetlands,* requires federal agencies to consider the effects of their actions on wetlands and avoid development in wetlands unless there is no practicable alternative.

Permits issued by the U.S. Army Corps of Engineers (USACE) under the Clean Water Act (CWA) are required for projects (federal and non-federal) disturbing wetlands. These permits typically require mitigation to offset adverse effects for projects disturbing 0.1 acre or more of wetlands.

Chesapeake Bay Resource Protecon Areas`

Resource Protec. on areas (RPAs) are defined in the Chesapeake Bay Preservaon Act of 1988 as a vegetave buffer at least 100 feet wide adjacent to most dal and non-tidal water bodies, including wetlands, with perennial (year-round) flow. The purpose of RPAs is to create a buffer between development and water bodies that traps polluon in stormwater runoff before it flows to the Chesapeake Bay. Fairfax County regulates proposed development acv ies within RPAs by requiring the preparation of a Water Quality Impact Assessment.

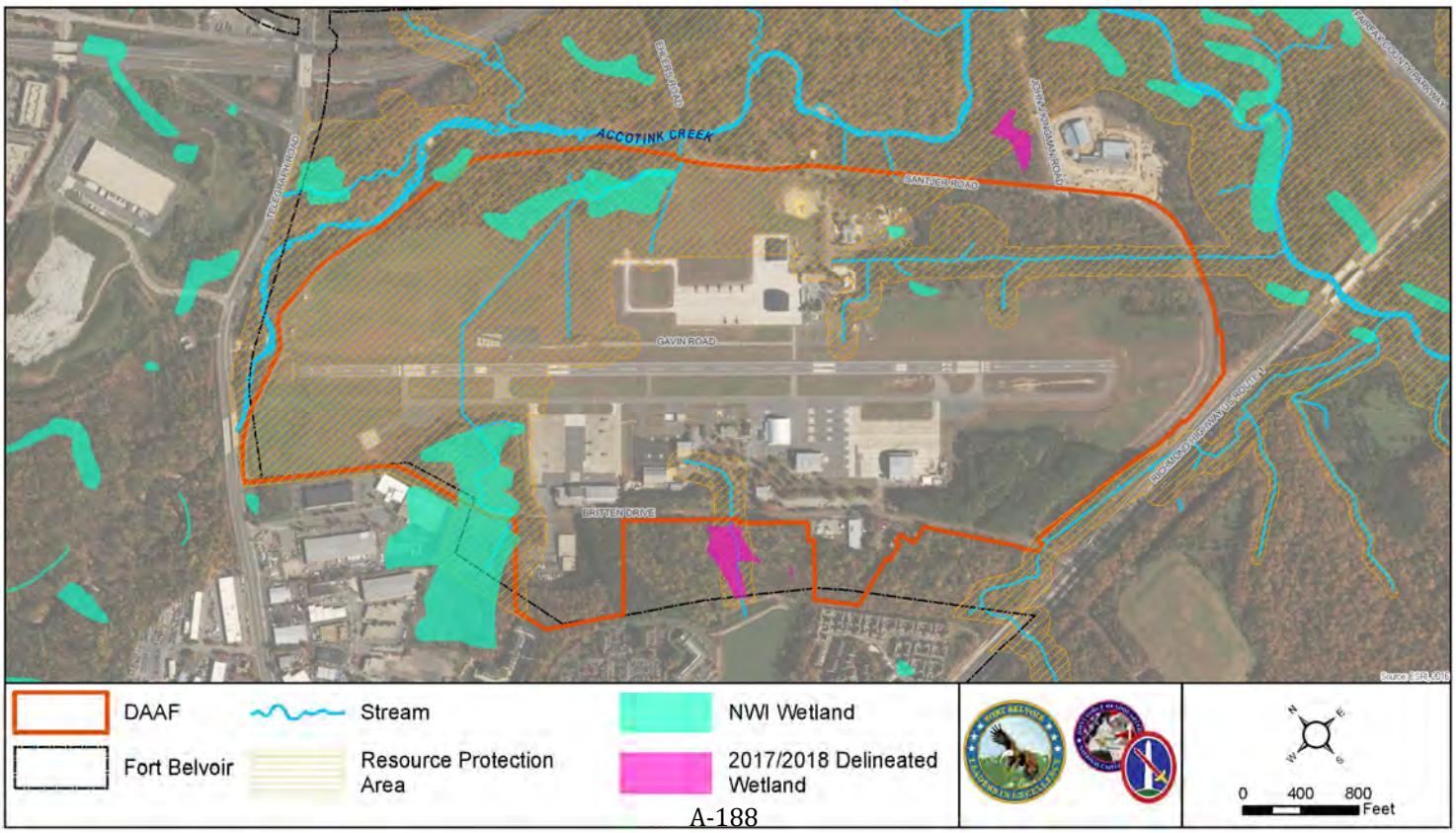


Figure 1. DAAF Wetlands, Streams, and RPAs

Development in RPAs is restricted to water dependent activities, maintenance of public facilities, passive recreation, water wells, and historic preservation; redevelopment of existing uses is also allowed in RPAs.

There are an estimated 2,700 acres of RPAs on Fort Belvoir, including 420 acres on DAAF (see **Figure 1**). Like wetlands, RPAs on Fort Belvoir are typically field-delineated prior to projects that would affect them. Projects in the Proposed Acon would permanently impact approximately 23 acres of RPAs, which would be less than one percent of total RPAs on Fort Belvoir. Impacts on RPAs from the Proposed Aco n would be *less-than-significant*. The implementaon of the projects over approximately 30 years, and the replacement of vegetaon removed from RPAs in compliance with Fort Belvoir requirements, would further minimize impacts.

Floodplains

Floodplains are low-lying areas of land next to waterbodies where flooding can potentially occur. The Federal Emergency Management Agency (FEMA) defines the 100-year floodplain as an area adjacent to a water body that has a one percent or greater chance of inundao n in any given year. On DAAF, the 100-year floodplain occurs in associao n with Acco nk Creek and its contribun g ground and surface waters (see **Figure 2**).

To support the ADP and EIS, USACE in cooperaon with FEMA updated the boundaries of the 100-year floodplain on DAAF because previous floodplain data was outdated. FEMA will use this data in the updated mapping of Fairfax County floodplains that it is currently under way. The updated floodplain on DAAF covers approximately 276 acres.

Projects in the Proposed Ac on would permanently encroach on approximately 7.5 acres of the 100-year floodplain on DAAF. Based on the EIS analysis, increases from this encroachment in the floodplain's horizontal extent on DAAF would not exceed 2 feet. This es mate does not take into account measures that would be incorporated into the projects to minimize effects on the floodplain. Potenal adverse impacts on life or property downstream of DAAF would largely accrue in the post's Southwest Area, which primarily consists of undeveloped land in a conservaon status. Therefore, the Proposed Aco n's impacts on floodplains would be *less-than-significant*.

In accordance with EO 11988, the FONPA also addresses the Army's decision to implement the Proposed Acon in the 100-year floodplain at DAAF.

Executive Order 11988

EO 11988, *Floodplain Management*, requires federal agencies to determine if their actions would occur within a floodplain and to avoid development in floodplains when there is a practicable alternative.

Impervious Surface and Stormwater Runoff

Impervious surfaces include pavement and buildings that block precipitation from infiltrating the ground. Instead, precipitaon` runs off these surfaces as sheet flow, oen` carrying sediments, trash, petroleum residues from automobiles, and other pollutants. This runoff eventually drains to nearby waterbodies such as creeks, streams, and rivers.

Surface water quality in watersheds with impervious cover of 10 percent or more may exhibit characteris. cs of degradation or impairment. Watersheds with 20 percent or more impervious surface may have surface water quality that can be considered substanally d egraded or impacted.

DAAF and porons of Fort Belvoir's Main Post are in the Accon k Creek watershed. This watershed covers approximately 51 square miles in Fairfax County (see **Figure 3**). Fort Belvoir land represents approximately 11 percent of the watershed's total land area; the remaining 89 percent of the watershed is upstream of the installaon. Approximately 27 percent of the watershed's total land area consists of impervious surface, the majority of which (approximately 8,651 acres, or 96 percent) is upstream of Main Post and DAAF. This means that water quality condions on Fort Belvoir are strongly influenced by upstream development, exisng impervious surface, and stormwater management pracces. Approximately 11 percent (405 acres) of the Acconk Creek watershed on Fort Belvoir consists of impervious surfaces.

The construc on of new buildings and paved surfaces under the proposed ADP projects would increase impervious surface on DAAF/Main Post by up to an estimated 37 acres, or 9 percent above current condions on Main Post. New buildings and paved surfaces under the Full Implementaon Alternave are shown on **Figure 4**. While the total impervious coverage in the Main Post portion of the Accotink Creek watershed would increase to approximately 12 percent, it would represent only a 0.4 percent increase in impervious surfaces within the Accon k Creek watershed as a whole. Water quality on Main Post and DAAF would con nue to be strongly influenced by exisng development, impervious surfaces, and stormwater management prac ces in the majority of the Acconk Creek watershed upstream of the installaon.

As needed and to the extent pracca ble, the proposed ADP projects would incorporate measures to prevent or minimize increases in stormwater runoff to water bodies on and downstream of Fort Belvoir. Permits to discharge stormwater from DAAF, issued by the Virginia Department of Environmental Quality, would be updated for each of the proposed ADP projects to ensure pollutant concentraons remain within regulatory thresholds.

Therefore, adverse impacts from impervious surface increases resulng from the Proposed Acon would be *less-than-significant*.

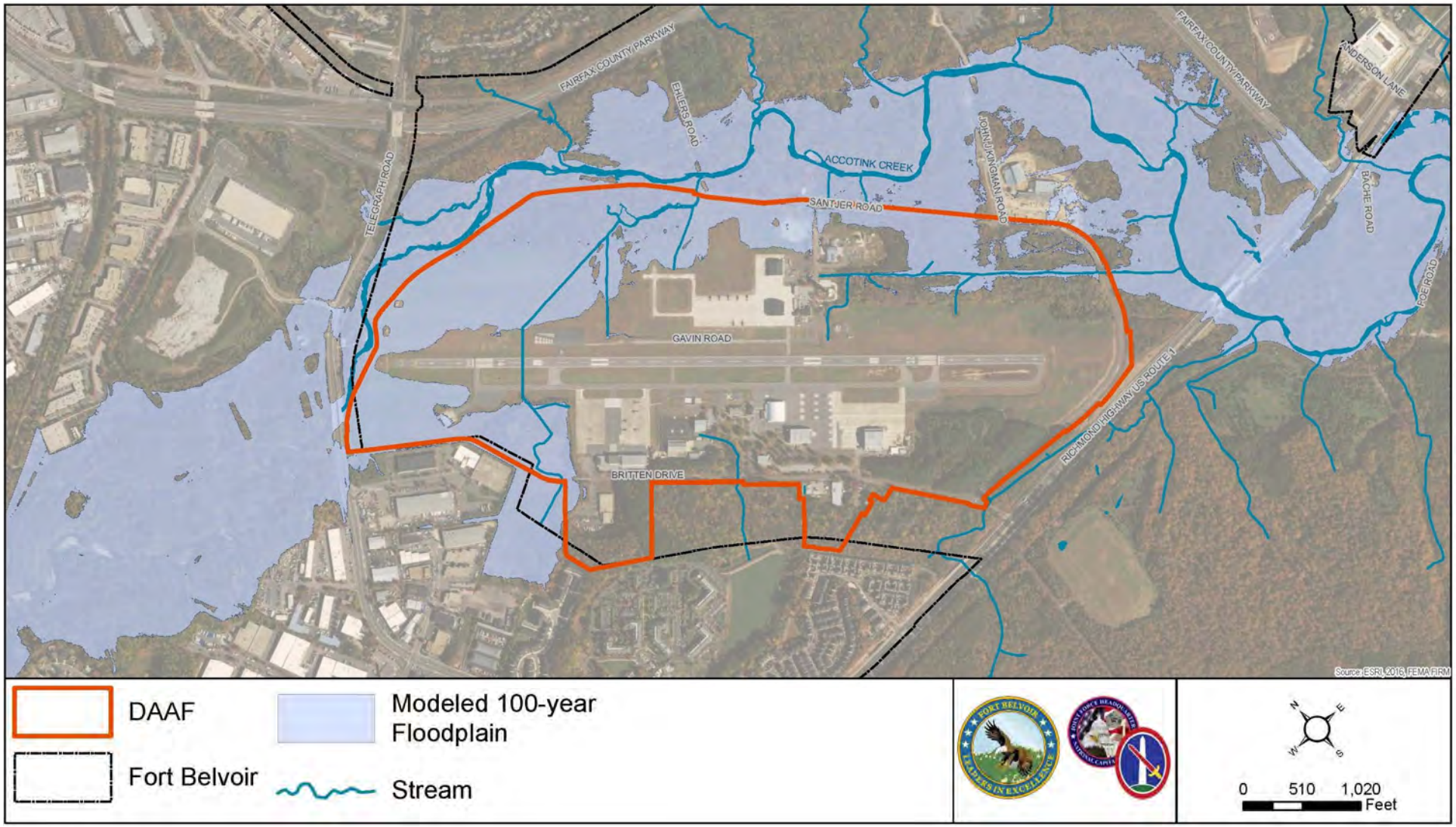


Figure 2 - DAAF Floodplains

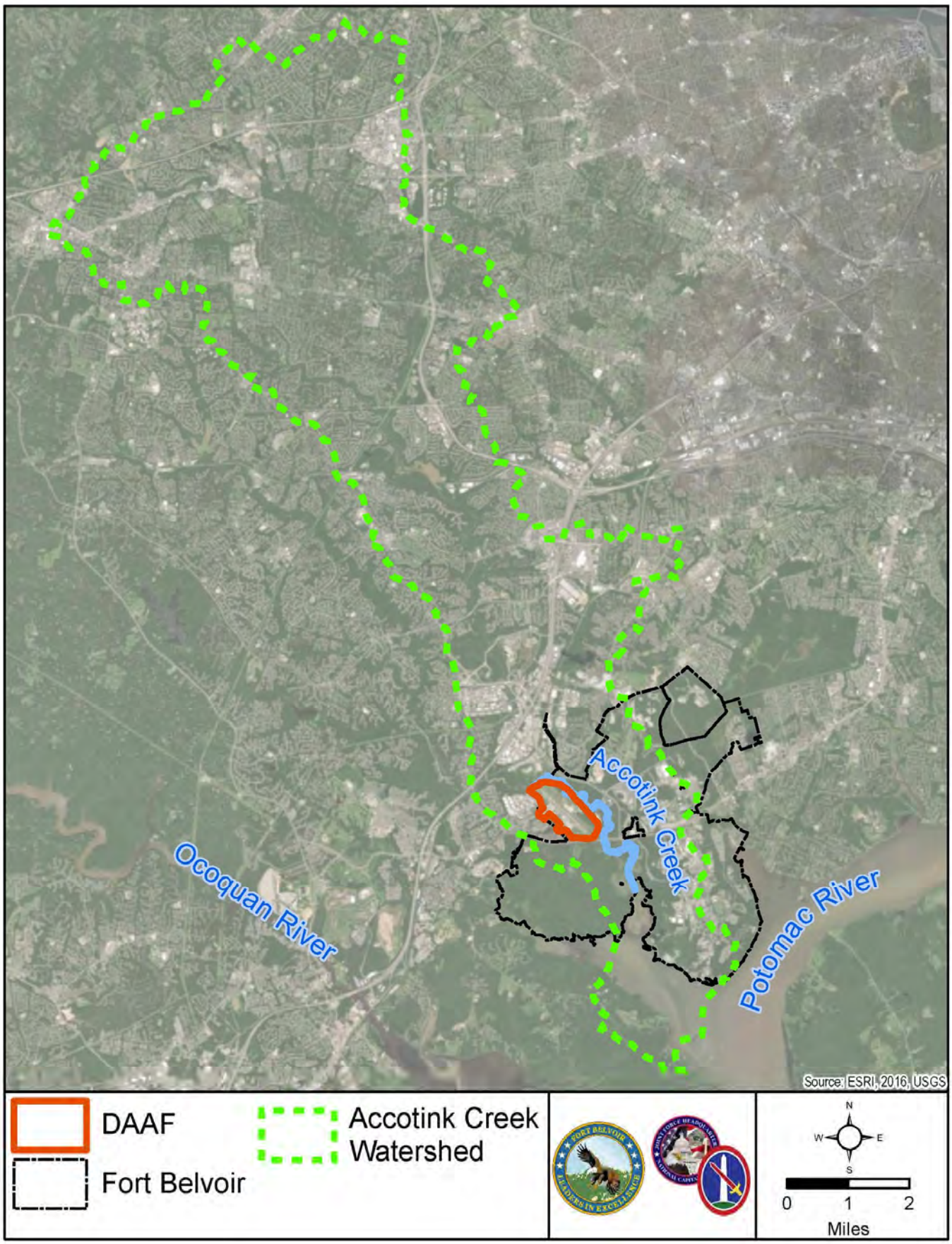
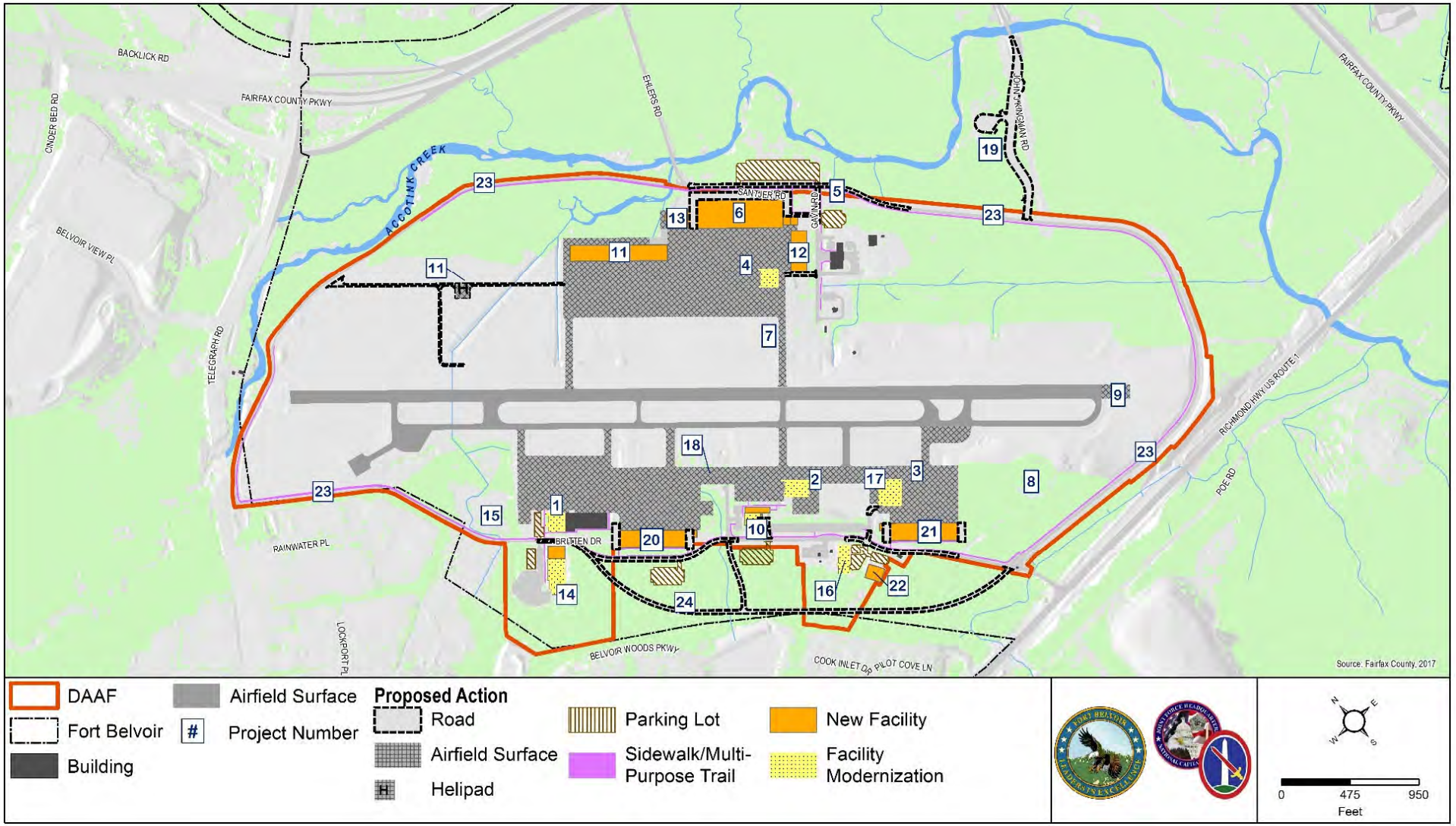


Figure 3 - Accotink Creek Watershed



Note: Project numbers shown here correspond to numbers shown in Table 1 on the Environmental Impact Statement Alternatives fact sheet.

Figure 4 - Full Implementation Alternative (New Buildings and Pavements)

DAAF Natural and Biological Resources

Fort Belvoir, including DAAF, contains large areas of forests, wetlands, and other natural habitats that support a variety of wildlife. Plants and wildlife that use these areas for habitat are representave of those occurring throughout the Mid-Atlan c region. Biological resources on Fort Belvoir are valued for their intrinsic, aesthec, economic, and recreaonal qualies and include fish, wildlife, plants, and their respecve habitats. Fort Belvoir administers an extensive natural resources management program on the installaon , including DAAF.

Vegetation

Vegetaon communies on DAAF are diverse and include forests, wetlands, and grasslands (see **Figure 1**). Fort Belvoir prevents the introduco n and spread of invasive plant species through an acve management pro gram.

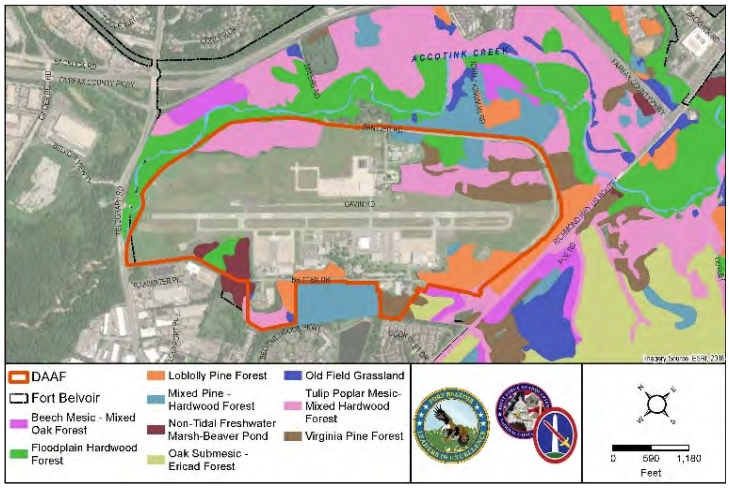


Figure 1. DAAF Vegetation Communities

Most of the proposed ADP projects would be built in areas of DAAF that have been previously disturbed from development of the airfield. Contractors would follow Fort Belvoir policies to minimize or prevent the spread or introducon of invasive plant species. Impacts on vegeta on from the Proposed Aco n would be *less-than-significant*.



Vegetation and maintained grass along the northern side of DAAF

Wildlife



Eastern gray squirrel, which is likely to inhabit DAAF

Common wildlife at Fort Belvoir and DAAF include 43 mammal species, 278 bird species, 65 fish species, 34 reple` species, and 27 amphibian species. Wildlife habitat is provided by vegetation and surface water features on the installaon.` The primary effect on wildlife from the proposed ADP projects would be temporary displacement of animals from habitat removal or increased noise and human presence during construction. In some limited cases, the operation of construcon` vehicles and equipment could result in inadvertent animal deaths during vegetation clearing. Implementation of the projects in previously disturbed areas of DAAF, and their distribu. on over a 30-year period, would minimize habitat loss and adverse effects on wildlife. Impacts on wildlife from the Proposed acon would be *less-than-significant*.

Protected Species and Habitats

Seco n 7 of the Endangered Species Act (ESA) requires federal agencies to consider the effects of their proposed actions on federally listed threatened and endangered species and crical habitat, and to consult with the U.S. Fish and Wildlife Service (USFWS) and/or Naonal Marine Fisheries Service (NMFS) to determine potenal effec ts on such species and habitat.

There are 13 federally or state-listed plant and animal species, or species at risk of or being considered for lisng, that are known or suspected to occur at Fort Belvoir. However, none of these species has been documented on DAAF, although suitable habitat may be available in undeveloped areas of the airfield.

In accordance with Section 7 of the ESA, the Army has determined that the Proposed Acon is *not likely to adversely affect* federally listed threatened and endangered species. The Army has consulted with USFWS accordingly and the Proposed Aco n would have no potenal to affect species under NMFS's jurisdicon.

Species surveys would be conducted on the project sites prior to beginning construction if suitable habitat for federally or state-listed species is determined to be present. Projects would also adhere to applicable me of year restrictions to prevent or minimize impacts on any rare, threatened, and endangered species that may be present on or near the project sites.

Special Natural Areas and Breeding Birds of Management Concern (BBMC) Habitat

Special Natural Areas

Fort Belvoir has designated Special Natural Areas throughout the installation. These areas contain natural resources having a high conservaon priority through various federal, state, DoD, and/or Army programs, or are recognized as having an important local or regional ecosystem funcon. Special Natural Areas overlapping or adjacent to DAAF consist of the Acconk Bay Wildlife Refuge (ABWR) and Fort Belvoir Forest and Wildlife Corridor (FWC). These areas are shown on **Figure 2**.

- The **ABWR** protects areas of recognized ecological significance, including several acve bald eagle nest sites within the federally and state-designated Potomac River Eagle Concentraon Area and habitat for federally and state -listed bats, the federally threatened and state-endangered small whorled pogonia, state-threatened wood turtle, and mulple bird species of concern.
- The **FWC** was established to protect significant wildlife habitat and maintain a connuo us area of natural forest habitat throughout Fort Belvoir. This area is a vital link between the Jackson Miles Abbo Wildlife Refuge in the northeast poron of Fort Belvoir and the ABWR.

None of the proposed ADP projects would affect the ABWR. Less than one acre of the FWC would be permanently impacted by construco n of the new Farrar Road Access Control Point (**Project 19**). Impacts on Special Natural Areas from the Proposed Ac on would be *less-than-significant*.

BBMC Habitat

Fort Belvoir has idenfied approximately 3,600 acres of habitat for six BBMC species. DAAF BBMC habitat covers approximately 370 acres (**Figure 2**), representing approximately 10 percent of BBMC buffers on Main Post.

Five BBMC species have been documented on DAAF: the grasshopper sparrow, prairie warbler, Kentucky warbler, prothonotary warbler, and wood thrush. Porons of DAAF BBMC habitat overlap the ABWR and FWC. Avoidance of BBMC habitat is recommended during construcon or similar development acvies.

Approximately 21 acres of BBMC habitat on DAAF would be permanently impacted, represenn g approximately 6 percent of total BBMC habitat and less than 1 percent of BBMC habitat on Main Post. Impacts on BBMC habitat from the Proposed Aco n would be *less-than-significant*.

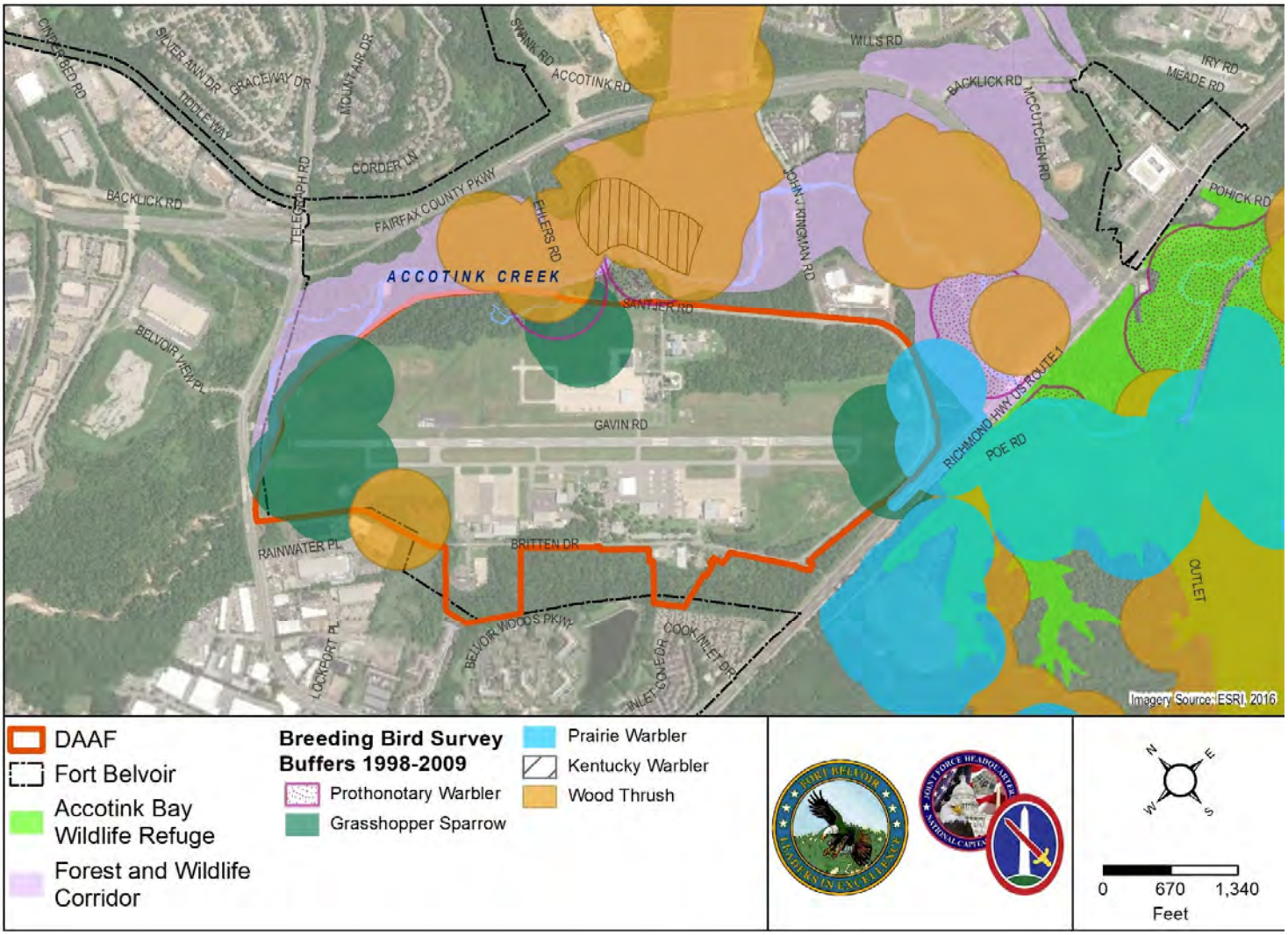


Figure 2. DAAF Special Natural Areas

Summary of Effects



EIS Impact Thresholds

- **No Effect** – No change to the resource or built system.
- **Less than significant Adverse Effects** – Adverse effects do not exceed the threshold of significance established for the resource or built system. Adverse effects may be detectable, but they are within or approximate to normal variability and do not appreciably affect the extent or value of the resource or built system. Adverse impacts are easily absorbed without mitigation and do not contribute toward long-term consequences.
- **Less than significant Adverse Effects with Mitigation** – Adverse impacts with mitigation applied do not exceed the threshold of significance established for the resource or built system.
- **Significant Adverse Effects** – Adverse impacts exceed normal variability, appreciably affect the value or extent of the resource or built system, and may affect the viability of the resource or built system. Full mitigation of adverse impacts is not possible or mitigation success is not likely, and long-term deterioration of the resource or built system may be unavoidable.
- **Beneficial Effects –** Impacts on the resource are positive.

The terms "effects" and "impacts" are used synonymously in the Draft EIS.

Resource Areas Analyzed

- Land Use, Plans, Aesthetics and Visual Quality, and Coastal Zone Management
- Historic and Cultural Resources
- Air Quality
- Noise
- Geology, Topography, and Soils
- Water Resources
- Biological Resources
- Health and Safety
- Hazardous Materials and Wastes
- Cumulative Impacts

Management Measures

To mitigate significant adverse impacts on wetlands and streams from the Full and Partial Implementation Alternatives, the Army would adhere to applicable requirements of permits issued by the US Army Corps of Engineers (USACE) in accordance with the Clean Water Act. Such requirements would likely include the preparation of compensatory mitigation plan.

The following minimization measures or best management practices (BMPs) would further minimize less-than-significant impacts on the current affected environment:

- Standard construction BMPs would be implemented to minimize or eliminate soil erosion and downstream sedimentation.
- Soils would be managed at an individual project level in compliance with applicable laws and regulations.
- Project designs would incorporate low impact development measures where feasible, further reducing the transport of soils offsite in surface runoff.
- Stormwater runoff would be managed in accordance with Section 438 of the Energy Independence and Security Act and Fort Belvoir's Virginia Pollutant Discharge Elimination System permit.
- Site-specific health and safety plans and procedures would sufficiently manage risk unique to each project site.
- All hazardous materials and wastes would be handled, stored, and disposed of in accordance with Fort Belvoir's Resource Conservation and Recovery Act permit.
- Project proponents would conduct surveys on and/or near the project sites prior to implementing construction and demolition activities to determine the presence of Breeding Birds of Management Concern (BBMC); adhere to applicable time of year restrictions for BBMC as warranted; and, coordinate with Fort Belvoir Directorate of Public Works (DPW) to identify and establish suitable areas of BBMC buffer on DAAF or Fort Belvoir to replace BBMC buffer on DAAF permanently lost from the Proposed Action.
- Projects with potential to permanently impact Chesapeake Bay Resource Protection Areas (RPAs) on DAAF would be planned, conducted, and mitigated as applicable in accordance with the requirements of Fort Belvoir's *Guide for Resource Protection Areas (RPAs) and Stream Buffers* dated 21 September 2016. Such requirements could include the preparation of a Water Quality Impact Assessment in accordance with 9 Virginia Administrative Code (VAC) 25-830 -140 and approval by DPW Environmental Division, and on-site or off-site mitigation plantings at ratios specified in the guidance to replace vegetation removed from the RPA.

DAAF ADP EIS Impact Summary

Resource	No Action Alternative	Full Implementation Alternative	Partial Implementation Alternative
Land Use, Plans, Aesthetics and Visual Quality, and Coastal Zone Management	No short-term impacts. Less-than-significant long-term impacts.	Less-than-significant short-term impacts. Beneficial long-term impacts. Consistent with the Virginia Coastal Zone Management Program.	Impacts would be similar to those of the Full Implementation Alternative, but less substantial due the reduced scope.
Historic and Cultural Resources	No impacts.	Less-than-significant short-term impacts. No long-term impacts. **National Historic Preservation Act (NHPA) Section 106 determination:** *No adverse effect* on historic and cultural resources.	
Air Quality		Less-than-significant short-term and long-term impacts.	
Noise		Less-than-significant short-term and long-term impacts.	
Geology, Topography, and Soils		No significant impacts. Less-than-significant short-term and long-term impacts.	
Water Resources		Significant long-term impacts on **wetlands** and **streams**. Less-than-significant short-term and long-term impacts on other Water Resources.	Significant long-term impacts on **wetlands**. Less-than-significant short-term and long-term impacts on other Water Resources.
Biological Resources		Less-than-significant short-term and long-term impacts. **ESA Section 7 determination:** Not *likely to adversely affect federally listed threatened and endangered species*.	Impacts would be similar to those of the Full Implementation Alternative, but less substantial due the reduced scope.
Health and Safety		Less-than-significant short-term and long-term impacts.	
Hazardous Materials and Wastes	Less-than-significant long-term impacts.	Less-than-significant short-term and long-term impacts, and some beneficial long-term impacts.	
Cumulative Impacts	Less-than-significant cumulative impacts.	Less-than-significant cumulative impacts.	

Impact Duration

• Short-term: occurring during construction • Long-term: occurring during project operation

Impact Thresholds

• No impact • Less than significant impact • Significant impact • Beneficial impact

National Historic Preservation Act

Section 106 of the National Historic Preservation Act requires federal agencies to consider the effects of their actions on historic properties listed or eligible for listing in the National Register of Historic Places (National Register).

The Army's proposed action to implement Davison Army Airfield (DAAF) Area Development Plan (ADP) projects requires review under Section 106.

What is the National Register of Historic Places?

The National Register is the official list of the nation's historic places worthy of preservation. Buildings, structures, objects, archaeological sites, landscapes, and districts can be listed in the National Register.

To be eligible for listing, a property must meet certain criteria with respect to age, state of preservation, and significance. In general, it must be at least 50 years old and must appear much the way it did in the past. It also must be associated with events, activities, persons, or developments that were important in the history of the United States.

How do federal agencies consider potential effects on historic properties?

Federal agencies review the potential impacts of a proposed action on historic properties in consultation with the State Historic Preservation Officer (SHPO). In Virginia, this is one of the roles of the Virginia Department of Historic Resources (VDHR). In addition to the SHPO, other agencies, organizations, and individuals, known as "consulting parties," may be invited to participate, if they have a demonstrated interest in the potential effects of the undertaking on historic properties. Such consulting parties may include local historic preservation groups or owners of historic properties. Federally recognized Native American tribes must be invited to participate as well.

What is the role of the public in the Section 106 process?

The public must be provided opportunities to review and provide input during the process, especially with regard to properties that may have historic significance for the community and may need to be evaluated for eligibility. Public input should also be sought when assessing potential effects.

What is the relationship between Section 106 and the National Environmental Policy Act (NEPA)?

Reviews of proposed federal actions under Section 106 and NEPA are different processes. However, proposed federal actions that are subject to NEPA are generally also subject to Section 106. These processes can be conducted in parallel to achieve greater efficiency. This is the case for the DAAF ADP Environmental Impact Statement (EIS). Thus, public participation opportunities for the NEPA process, such as the 45-day Draft EIS review period, also serve as public participation opportunities for the Section 106 process.

Are there historic properties at or near DAAF?

Fort Belvoir has conducted extensive historic resource surveys within its boundaries since the 1920s. DAAF was surveyed in 2009 and the Army determined that it contains no National Register-eligible resources. Properties that have been listed or determined eligible for listing in the National Register are located elsewhere on Fort Belvoir. The on-post National Register-eligible property closest to DAAF is the Camp A.A. Humphreys Pump Station and Filter Building, briefly described in Table 1.

Several other historic sites are located near DAAF. These sites are briefly described in Table 1. Their locations are shown on the National Historic Preservation Act display board.

The Draft EIS determined that the Army's Proposed Action would have no adverse effects on historic properties on or outside Fort Belvoir.

Table 1 – Historic Sites Near DAAF

Historic Site	Listing(s)	Significance
Accotink United Methodist Church	Fairfax County Historic Site	Accotink United Methodist Church was built in 1880 and served as one of the institutional and cultural centers for Euro-American residents in the Village of Accotink.
Camp A.A. Humphreys Pump Station and Filter Building	National Register-Eligible Virginia Landmarks Register	The Pump Station and Filter Building was originally built in 1918 and is one of the few remaining vestiges of Camp A.A. Humphreys. The facility was expanded in 1936. The complex is historically significant as an example of World War I-era support facilities and for technological advances in the purification of drinking water. The complex ceased operation in 1970 and was renovated in 1986 for use as the Eleanor U. Kennedy Homeless Shelter.
Fort Belvoir Military Railroad	National Register-Eligible	Construction of the railroad began in 1918 as two separate spur tracks to connect Camp A.A. Humphreys with existing steam and electric rail lines and provide access to and from Washington, DC. The railroad was upgraded with the latest technology as part of a major World War II-era construction campaign at Fort Belvoir.
LaGrange Site & Marders Family Cemetery	Fairfax County Historic Site	This 28-acre site and cemetery was owned by Robert Boggess and his descendants until 1996. The house (now demolished) was built in 1867 on the site of a former residence and inn erected between 1740 and 1744.
Mount Air House Site and Grounds	Fairfax County Mount Air Historic District Overlay National Register-eligible archaeological site	The manor property dates to the 18th century and occupies a hilltop overlooking Accotink Creek. Several houses were built on the property throughout the 18th and 19th centuries. The circa-1830 house was destroyed by fire in 1992, but outbuildings, landscaped grounds, and burial grounds still remain. A National Register-eligible archaeological site is located on the grounds. The associated overlay district was established by Fairfax County in 1984 to protect and maintain the property's historic visual character (viewshed).
Old Colchester Road	National Register-Eligible	Old Colchester Road originally led to the seaport of Colchester, Virginia, on the banks of the Occoquan River near the Potomac River. Alexandria, Virginia ultimately took its place as the major seaport in the area and Old Colchester Road was incorporated into State Route 611.
Pohick Church & Cemetery	National Register-Listed Virginia Landmarks Register Fairfax County Pohick Church Historic Overlay District	Pohick Church is a brick, Palladian-style church built between 1769 and 1774. George Washington and George Mason attended services there. The associated overlay district was established in 1970 to protect and maintain the church's viewshed.

The Army's Proposed Action would have no adverse effects on the historic properties listed above.



Pohick Church & Cemetery



Fort Belvoir Military Railroad



Camp A.A. Humphreys Pump Station and Filter Building

Welcome

Davison Army Airfield (DAAF)
Area Development Plan (DEIS)
Draft Environmental Impact Statement (DEIS)

In accordance with restrictions on public gatherings due to the COVID-19 public health emergency, the Army is providing information about the DAAF ADP DEIS in an online format for the duration of the 45-day DEIS public review period that began on **July 24, 2020** and will end on **September 8, 2020**. During that time, this information will be available for your review 24 hours a day, 7 days a week.

Teleconference Opportunities

Two public teleconferences will be held on **August 24, 2020** to provide you with the opportunity to comment and hear more about the ADP and DEIS. To join a teleconference, dial **1-877-286-5733** (toll free) and enter the passcode when prompted:
Teleconference 1: 1:00 PM-3:00 PM; Passcode 676-543-300#
Teleconference 2: 6:00 PM-8:00 PM; Passcode 668-662-26#
Each teleconference will have the same format and content.

Additional information on how to comment on the ADP and DEIS is provided on the "How To Comment" poster.

Learn about the project



Ask questions



Offer comments



Identify Potential issues



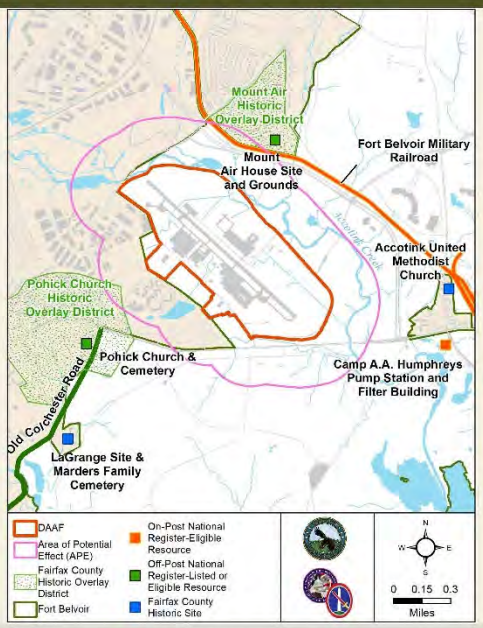
National Historic Preservation Act

Section 106 of the National Historic Preservation Act

- Requires federal agencies to consider potential effects on historic properties.
- Applies to historic properties listed in or eligible for the National Register of Historic Places (National Register).
- Provides opportunities for public involvement and comment.

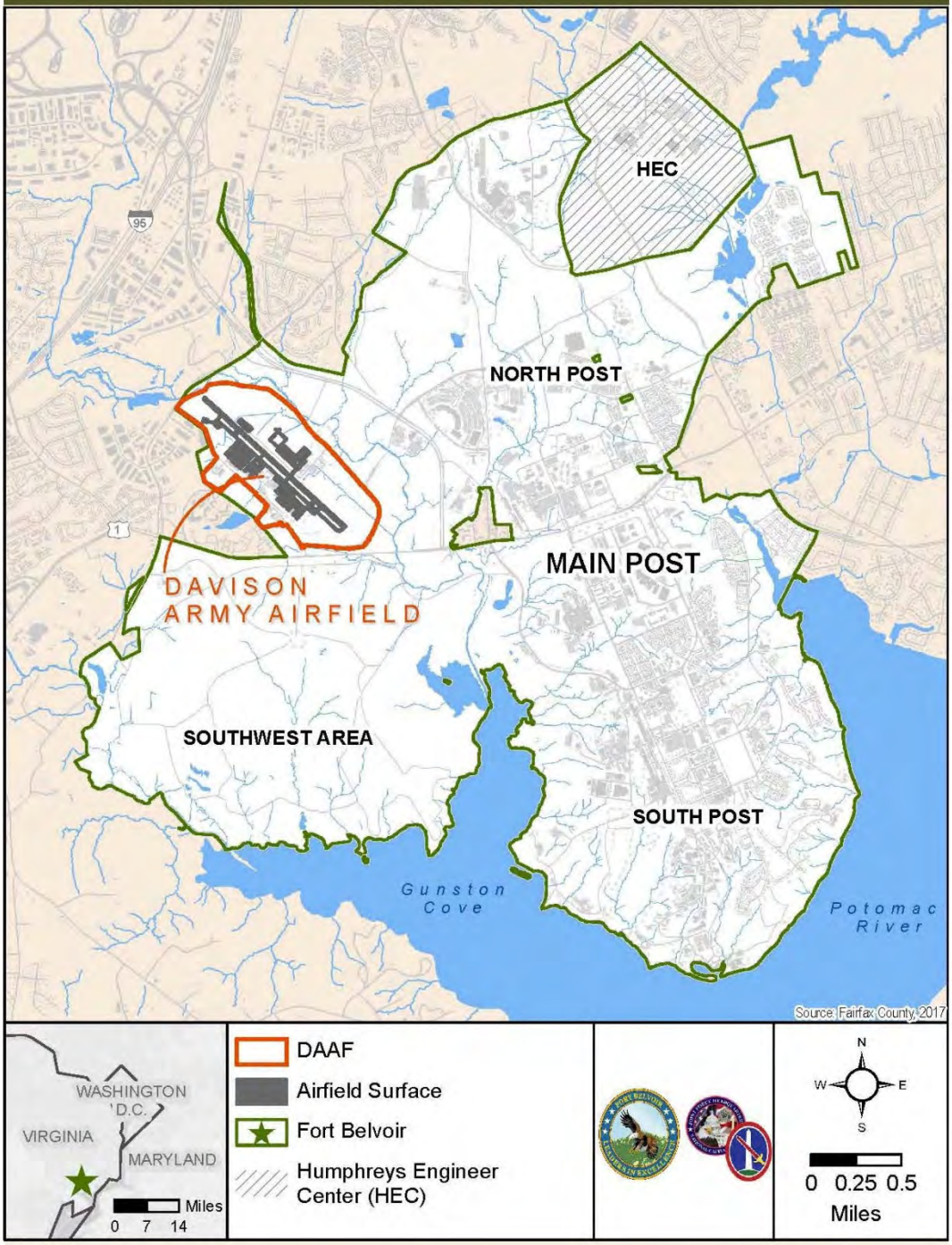
Are there historic properties on or near DAAF?

- No DAAF properties have been listed or determined eligible for listing in the National Register.
- Multiple properties listed or determined eligible for listing in the National Register are located near DAAF.



No National Register-listed or eligible properties near DAAF would be adversely affected by the Proposed Action

DAAF Location



Proposed Action

What is the Proposed Action?

The Proposed Action is to implement projects identified in the Davison Army Airfield (DAAF) Area Development Plan (ADP).



What is an ADP?

- An ADP provides site planning direction for a specific area of a military installation.
- ADPs are required by Department of Defense (DoD) regulations.

Why is the Proposed Action Needed?

To create a safe, secure, sustainable, and consolidated aviation complex that allows for mission growth and provides multiple services in a compact campus by:

- Replacing outdated, undersized, and inefficient facilities
- Improving airfield layout
- Meeting airfield design requirements

Projects in the DAAF ADP would be implemented over approximately 30 years.

The Proposed Action does not include, nor would it require, substantial changes in missions, air operations, or the number of aircraft and personnel at DAAF.


Building 3232


Building 3136


View from DAAF Flight Control Tower, looking southwest

Davison Army Airfield (DAAF)



Aerial view of DAAF



Flight control tower overlooking DAAF

DAAF Tenants

DAAF Tenant Missions

- Immediate response to contingencies in the National Capital Region and premier air movement to our nation's leaders
- Operational, logistical, and training support for Army National Guard and Civil Air Patrol units
- Research and development of aircraft sensor technology

DAAF tenants operate approximately 50 small planes and helicopters:

- VH-60 / UH-60 / EH-60 Black Hawk
- Cessna 172 / 182
- C-26 Metroliner
- UH-72 Lakota
- DHC-6 Twin Otter
- Beechcraft C-12 Huron
- UC-35 Citation



DHC-6 Twin Otter



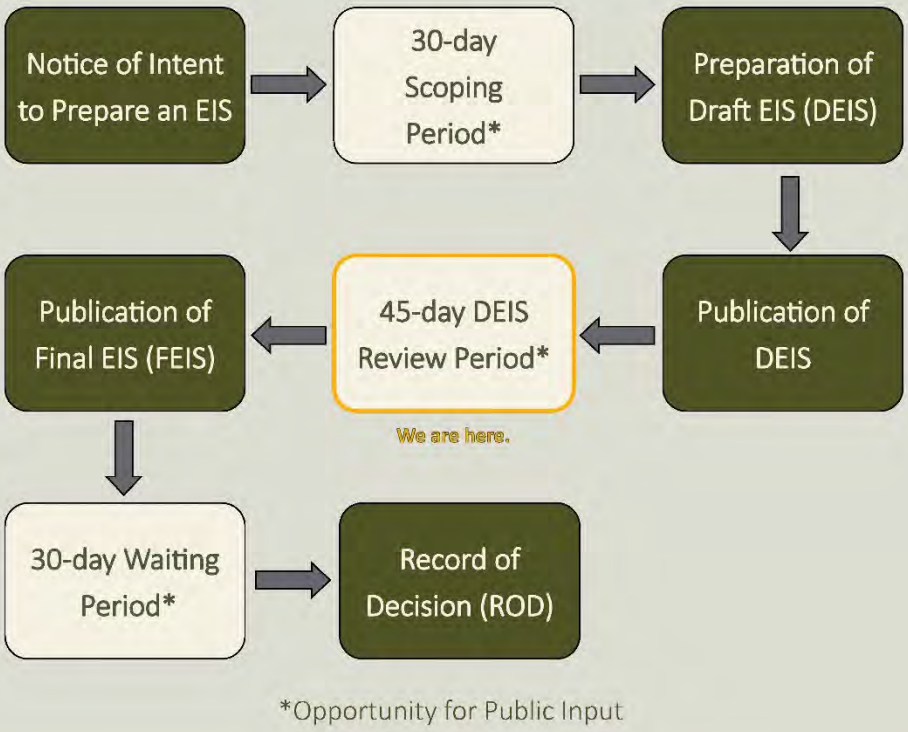
UH-60 Black Hawk



UH-72 Lakota

National Environmental Policy Act (NEPA) and Environmental Impact Statement (EIS) Process

- NEPA requires federal agencies to consider the impacts of their actions.
- For major actions, an EIS must be prepared.
- An EIS describes the proposed action, alternatives, and impacts.
- Public participation is an essential part of NEPA.



*Opportunity for Public Input

Resources evaluated in the Draft EIS:

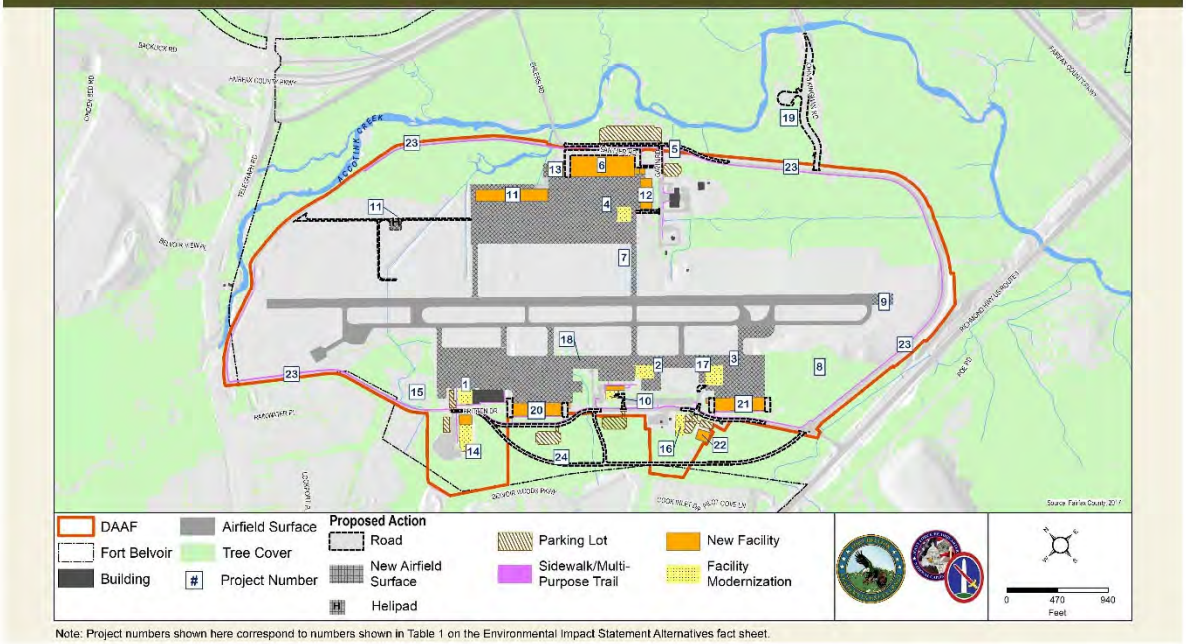
- Land use, plans, aesthetics and visual quality, and coastal zone management
- Historic and cultural resources
- Air quality
- Noise
- Geology, topography, and soils
- Water resources
- Biological resources
- Health and safety
- Hazardous materials and wastes
- Cumulative impacts

Your participation in the NEPA process is encouraged! Consideration of the views of all interested parties promotes open communication, better informs the EIS, and enables better decision making.

No Action Alternative



Full Implementation Alternative

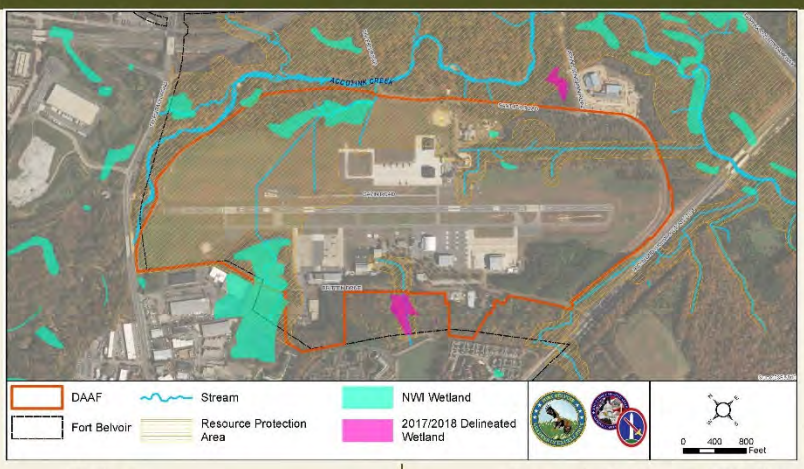


Note: Project numbers shown here correspond to numbers shown in Table 1 on the Environmental Impact Statement Alternatives fact sheet.

Partial Implementation Alternative



DAAF Surface Water Features



Wetlands

- Executive Order 11990, *Protection of Wetlands*, requires federal agencies to consider the effects of their actions on wetlands and avoid developing in wetlands to the extent possible.
- The US Fish and Wildlife Service's National Wetlands Inventory (NWI) identifies wetlands covering 1,250 acres on Main Post and 192 acres on DAAF.
- 3.3 acres of wetlands were delineated on DAAF in support of this EIS.

Chesapeake Bay Resource Protection Areas (RPAs)

- The Chesapeake Bay Preservation Act defines RPAs as 100-foot areas adjacent to waterbodies and wetlands.
- There are approximately 2,700 acres of RPAs on Fort Belvoir and 420 acres on DAAF.
- RPAs on Fort Belvoir are delineated prior to project implementation.

The Proposed Action would have *significant adverse impacts* on wetlands and streams at DAAF.

DAAF Floodplains



Floodplains

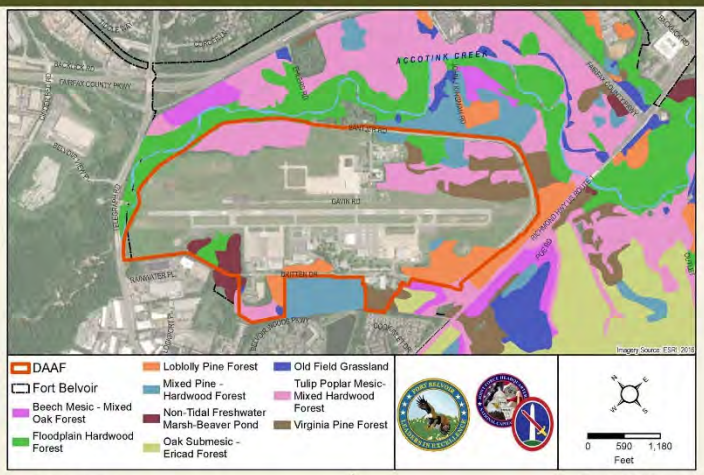
- EO 11988, *Floodplain Management*, requires federal agencies to determine whether a proposed action would occur within a floodplain and to avoid floodplains, to the maximum extent possible, when there is a practicable alternative.
- Floodplain boundaries on DAAF were updated for the Draft EIS because previous floodplain mapping was approximate and out of date.
- The Federal Emergency Management Agency (FEMA) will add the updated DAAF floodplain to its floodplain mapping update for Fairfax County.

Are there floodplains on or near DAAF?

- The updated floodplain on DAAF covers approximately 276 acres.
- Horizontal and vertical increases of the updated DAAF floodplain resulting from the Proposed Action would be less than 2 feet.
- The Army has prepared a Draft Finding of No Practicable Alternative in accordance with EO 11988 explaining its decision to implement the Proposed Action in portions of the floodplain on DAAF.

The Proposed Action would have less-than-significant impacts on floodplains.

DAAF Vegetation Communities



Current Conditions

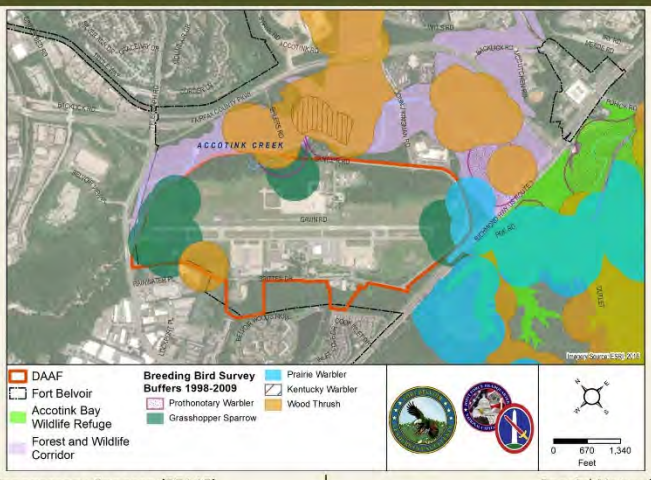
- Vegetation communities on and around DAAF includes grasslands, forests, and wetlands.
- Vegetation on DAAF also includes shrubs, trees, and grass near buildings, roads, parking lots, and the runway/taxiways.
- Fort Belvoir actively manages invasive vegetation.
- No federally protected plant species have been documented on DAAF.

Potential Impacts

- The proposed ADP projects would permanently clear up to approximately 9 acres of vegetation communities on DAAF.
- The projects would primarily affect maintained vegetation around developed areas of the airfield.
- Contractors would follow Fort Belvoir procedures to prevent the introduction and spread of invasive vegetation.
- No federally protected plant species would be affected.

The Proposed Action would have less-than-significant impacts on vegetation communities.

DAAF Special Natural Areas



Breeding Birds of Management Concern (BBMC)

- Fort Belvoir recognizes 3,600 acres of BBMC habitat on the installation, including 370 acres on DAAF.
- Five BBMC species occur on DAAF: grasshopper sparrow, prairie warbler, Kentucky warbler, prothonotary warbler, and wood thrush.
- The proposed ADP projects would permanently clear an estimated 21.4 acres (5.8 percent) of BBMC habitat on DAAF, representing less than 1 percent of BBMC habitat on Fort Belvoir.
- Implementation of the projects over a 30-year period, and other measures, would help minimize impacts on BBMC.

Special Natural Areas

- The **Accotink Bay Wildlife Refuge (ABWR)** was established in 1979 to protect areas of recognized ecological significance on Fort Belvoir.
- The **Fort Belvoir Forest and Wildlife Corridor (FWC)** was established to protect significant wildlife habitat and to maintain a continuous area of natural forest habitat connecting larger natural areas adjacent to the installation.
- None of the proposed ADP projects would affect the ABWR; one long range ADP project would permanently encroach on less than 1 acre of the FWC.

The Proposed Action would have less-than-significant impacts on Special Natural Areas.

Summary of Effects

Resource	No Action Alternative	Full Implementation Alternative	Partial Implementation Alternative
Land Use, Plans, Aesthetics and Visual Quality, and Coastal Zone Management	No short-term impacts. Less-than-significant long-term impacts.	Short-term, less-than-significant impacts. Beneficial long-term impacts. Consistent with Coastal Zone Management Program.	Impacts would be similar to those of the Full Implementation Alternative, but less substantial due to the reduced scope.
Historic and Cultural Resources	No impacts.	Short-term, less-than-significant impacts. No long-term impacts.	
Air Quality		Less-than-significant short-term and long-term impacts.	
Noise		Less-than-significant short-term and long-term impacts.	
Geology, Topography, and Soils		Less-than-significant short-term and long-term impacts.	
Water Resources		Significant long-term impacts on **wetlands** and **streams**. Less-than-significant short-term and long-term impacts on other Water Resources.	Significant long-term impacts on **wetlands**. Less-than-significant short-term and long-term impacts on other Water Resources.
Biological Resources		Less-than-significant short-term and long-term impacts.	Impacts would be similar to those of the Full Implementation Alternative, but less substantial due to the reduced scope.
Health and Safety		Less-than-significant short-term and long-term impacts.	
Hazardous Materials and Wastes	Less-than-significant long-term impacts.	Less-than-significant short-term and long-term impacts, and some beneficial impacts.	
Cumulative Impacts	No cumulative impacts.	Less-than-significant cumulative impacts.	

Impact Duration

Short-term: occurring during construction Long-term: occurring during project operation

Impact Thresholds

• No Impact • Less-than-Significant Impact • Significant Impact • Beneficial Impact

The terms "effects" and "impacts" are used synonymously in the Draft EIS

How can you comment on the Draft EIS?

Teleconferences

Two public teleconferences will be held on **August 24, 2020**. To join, call **1-877-286-5733** and enter the passcode when prompted.

Teleconference 1: 1:00-3:00 PM; Passcode 676-543-300#

Teleconference 2: 6:00-8:00 PM; Passcode 668-662-26#

Online or U.S. Mail

Email: FortBelvoirNOI@usace.army.mil

Write: US Army Fort Belvoir Directorate of Public Works
Attn.: DAAF Draft EIS
Environmental Division, Chief
9430 Jackson Loop, Building 1442, Rm #230
Fort Belvoir, VA 22060-5116

Web: https://home.army.mil/belvoir/index.php/about/Garrison/directorate-public-works/environmental-division

All comments must be sent or postmarked no later than September 8, 2020

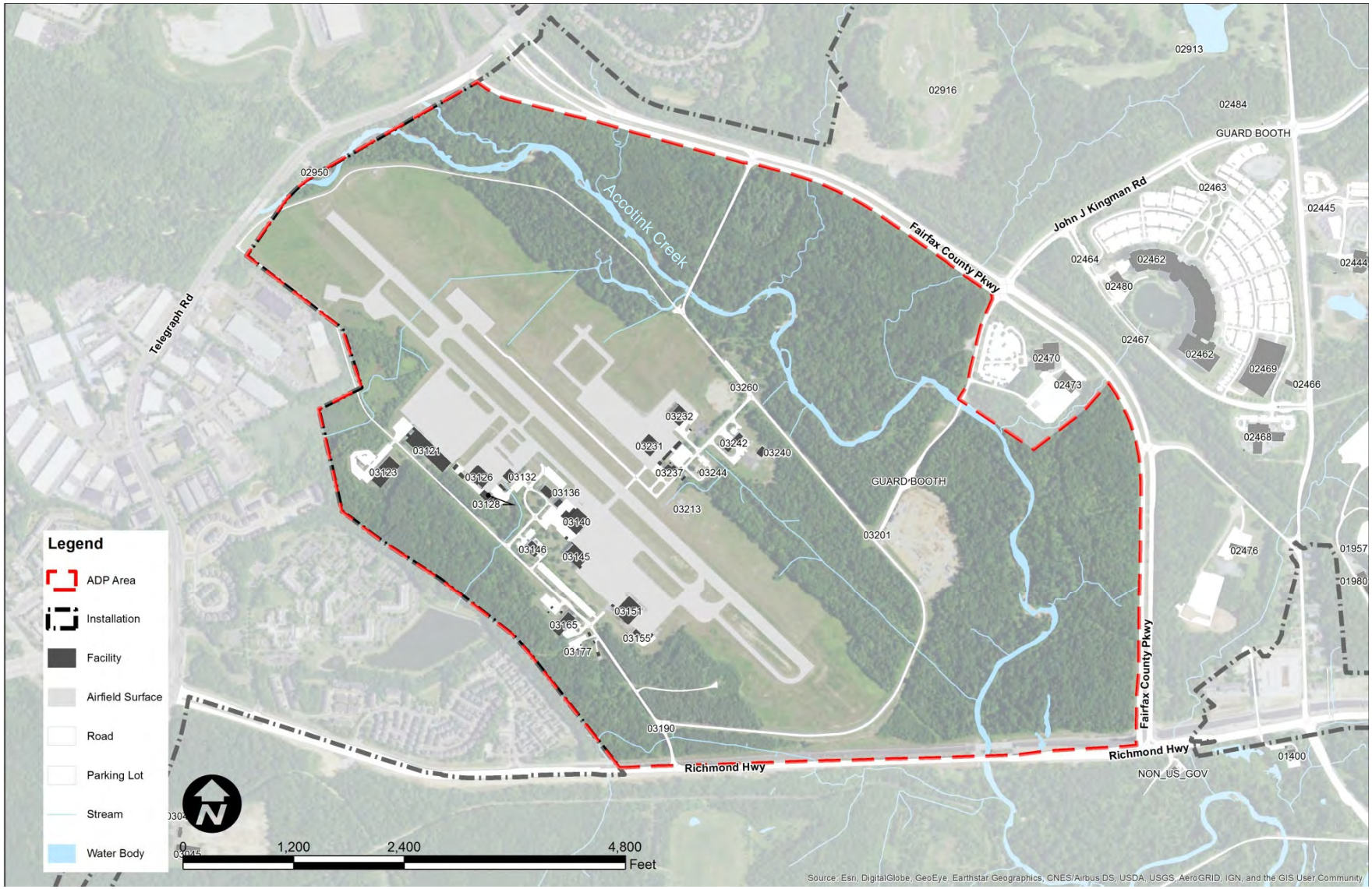
Fort Belvoir
Davison Army Airfield

Area Development Plan
Draft Environmental Impact Statement

Location of Davison Army Airfield



Davison Army Airfield (DAAF)



Davison Army Airfield (DAAF)
Area Development Plan (ADP)
Draft Environmental Impact Statement (EIS)

- This summary provides information about the Army's Proposed Action to implement an Area Development Plan (ADP) for Davison Army Airfield (DAAF) at US Army Garrison Fort Belvoir in Fairfax County, Virginia.
- The Army has prepared a Draft Environmental Impact Statement (Draft EIS) that evaluates the potential environmental effects from implementing the Proposed Action.
- The Draft EIS is currently available for a 45-day public comment period.
- The 45-day public comment period began on **24 July 2020** and will end on **8 September 2020** (the day after Labor Day).
- Information on how to comment on the Draft EIS is provided at the end of this summary.

Location and Background

- DAAF is located on Fort Belvoir's North Post at the intersection of US Route 1 and Fairfax County Parkway.
- DAAF covers approximately 350 acres and has operated since 1951.
- DAAF is operated by Military District Washington (MDW). Fort Belvoir owns and maintains DAAF buildings and infrastructure.

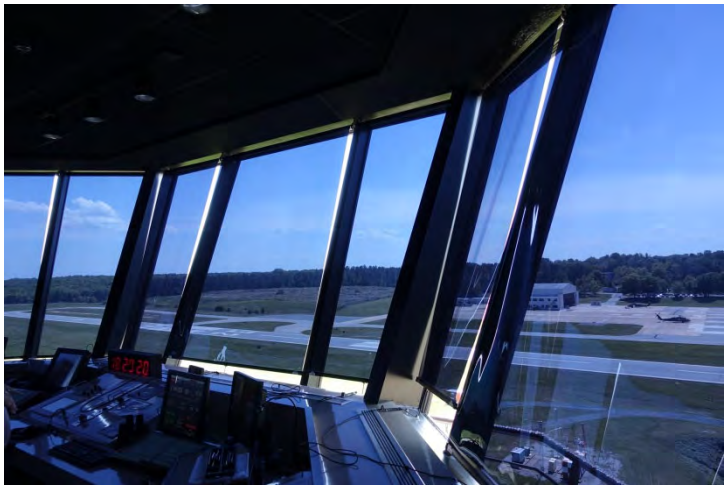


DAAF Tenants

- Department of Defense (DoD) tenants at DAAF include:
  - The Army Aviation Brigade (TAAB)
  - Airfield Division
  - 12th Aviation Battalion (12 AV BN)
  - Operational Support Airlift Activity / Operational Support Airlift Command (OSA-A /OSACOM)
  - Night Vision and Electronic Sensors Directorate (NVESD)
  - District of Columbia Army National Guard (DCARNG)
  - Civil Air Patrol (CAP)
- DAAF tenants support critical Army and DoD Contingency Response missions in the National Capital Region (NCR) and beyond.

DAAF Conditions

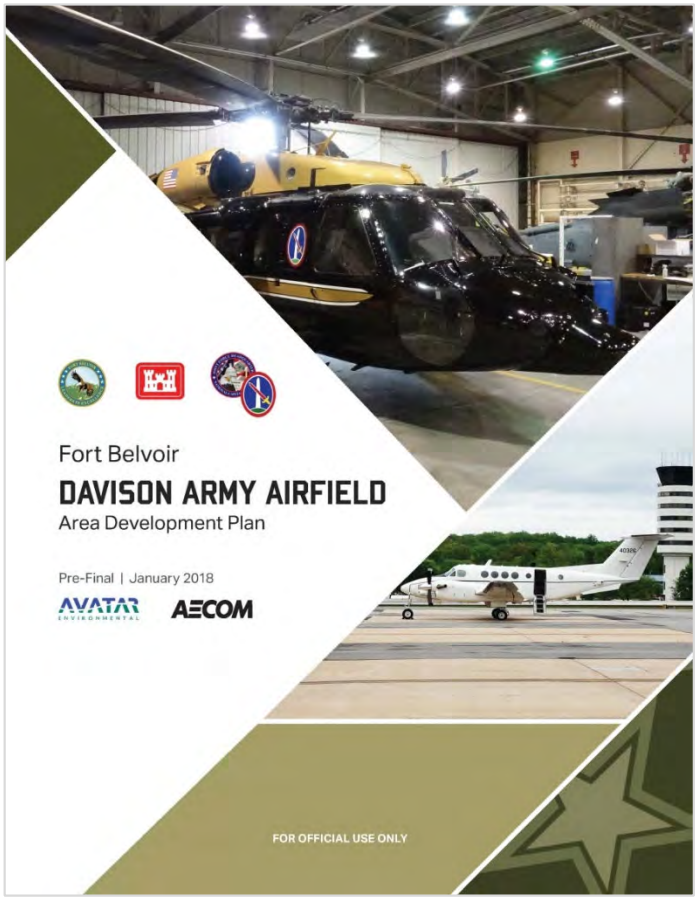
- 65 percent of buildings at DAAF are more than 30 years old, and 40 percent are 50 years or older.
- Multiple facilities are past their intended lifecycle and are obsolete, undersized, and/or inefficient.
- Several DAAF facilities are within safety zones defined by the DoD and Federal Aviation Administration (FAA) associated with the airfield's runway, and require temporary safety waivers to operate.





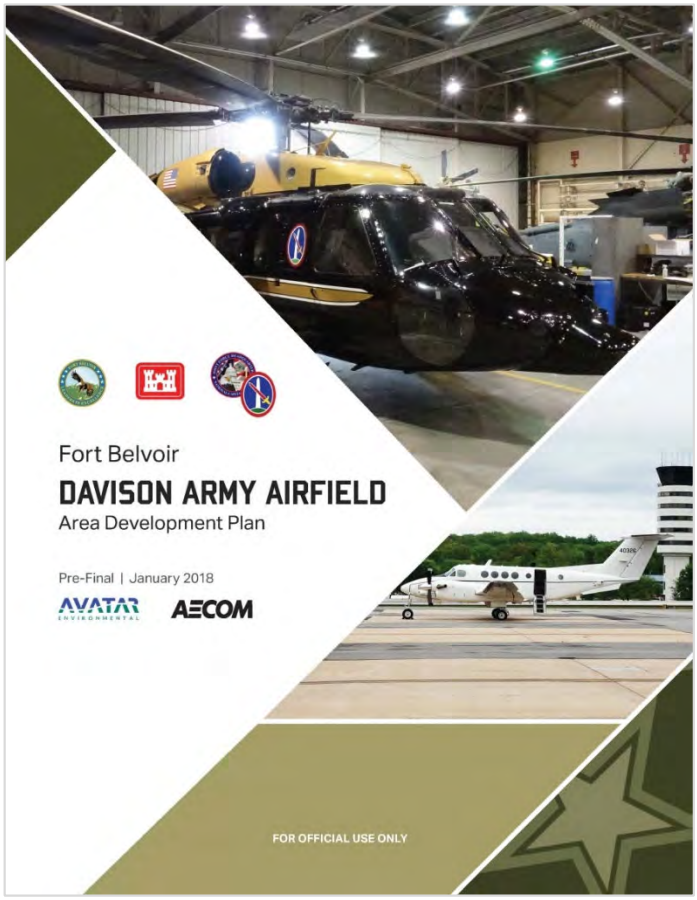
Area Development Plan

- DoD regulations require ADPs to be prepared for planning districts on military installations.
- DAAF is identified as a planning district in Fort Belvoir's Real Property Master Plan (RPMP), which was updated in 2015.
- The ADP will provide site planning direction at DAAF for the next 30 years.



Area Development Plan (con't.)

- The DAAF ADP includes multiple facility and infrastructure improvement projects that would:
  - Provide the necessary infrastructure.
  - Replace or renovate facilities built in the 1950s–1970s that are now outdated.
  - Eliminate facilities located in airfield safety zones; and
  - Consolidate tenant operations and make the layout of buildings on the airfield more efficient.



Proposed Action

- The Army's Proposed Action is to implement the projects in the ADP. The projects would be implemented over a 30-year period.
- The Proposed Action would occur within DAAF and Fort Belvoir. No additional land would be needed or acquired.
- The Proposed Action does not include, nor would it require, substantial changes in missions, air operations, or the number of aircraft and personnel at DAAF.
- Two alternatives for implementing the Proposed Action are evaluated in the Draft EIS: the **Full Implementation Alternative**, which would implement all of the projects in the ADP; and the **Partial Implementation Alternative**, which would implement a modified, reduced program of ADP projects.
- The No Action Alternative, under which none of the ADP projects would be implemented and current conditions at the airfield would continue, is also evaluated in the Draft EIS.

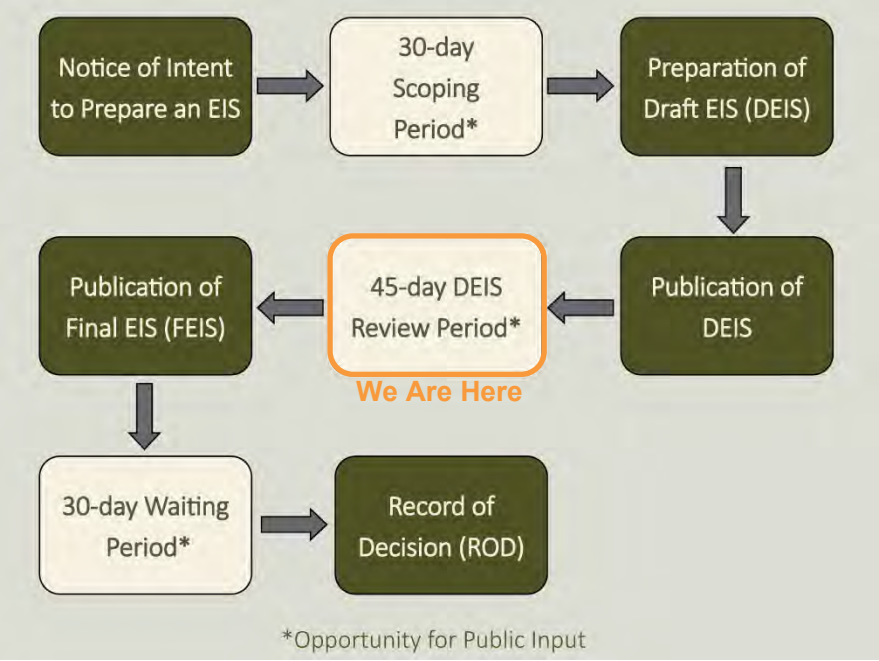
NEPA Process

- NEPA requires federal agencies to evaluate the potential environmental impacts from their proposed actions. The DAAF ADP is a major federal action requiring preparation of an Environmental Impact Statement, or EIS.

- NEPA also provides opportunities for the public to learn about and comment on federal proposed actions. The 45-day Draft EIS public comment period is such an opportunity.

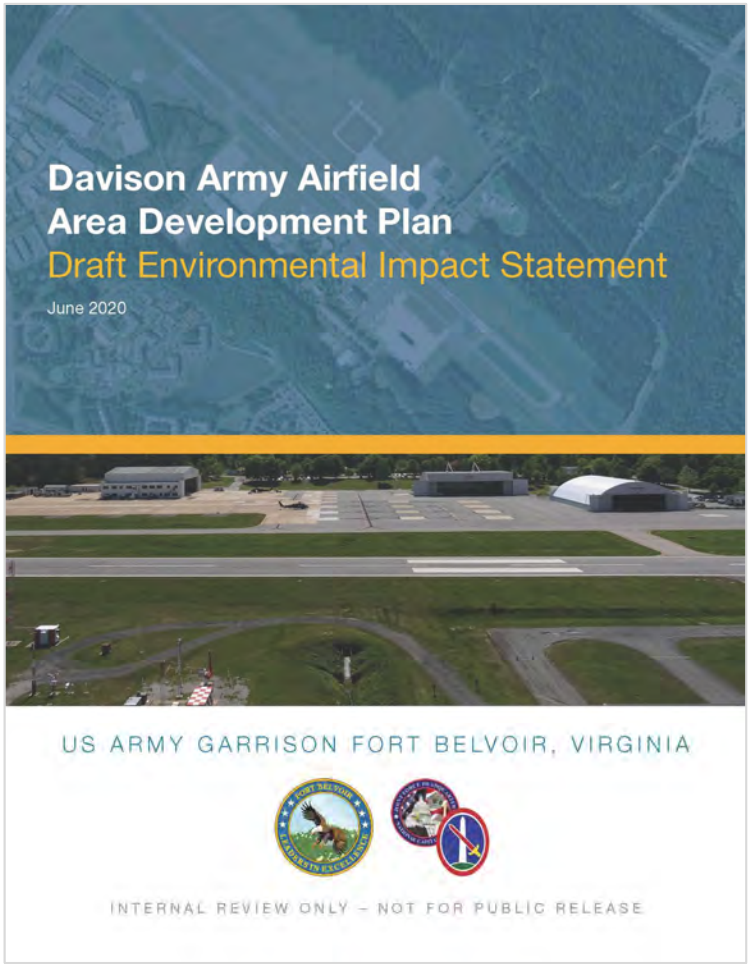
- The 45-day public comment period began on **24 July 2020** and will end on **8 September 2020**.

- Information on how to comment is provided at the end of this summary.



NEPA Process (con't.)

- Comments on the Draft EIS will be addressed in the Final EIS.
- The Final EIS is expected to be released in 2021.
- The NEPA process will conclude with the issuance of a Record of Decision (ROD) that will document the Army's selected alternative and measures to mitigate or minimize adverse environmental impacts.
- The ADP will be finalized after completion of the NEPA process.



Resources Evaluated in the Draft EIS

The Draft EIS evaluates potential impacts on the following resources:

- Land use, aesthetics, and coastal zone management
- Historic and cultural resources
- Air quality
- Noise
- Geology, topography, and soils
- Water resources
- Biological resources
- Health and safety
- Hazardous materials and waste
- Cumulative effects

Summary of Effects

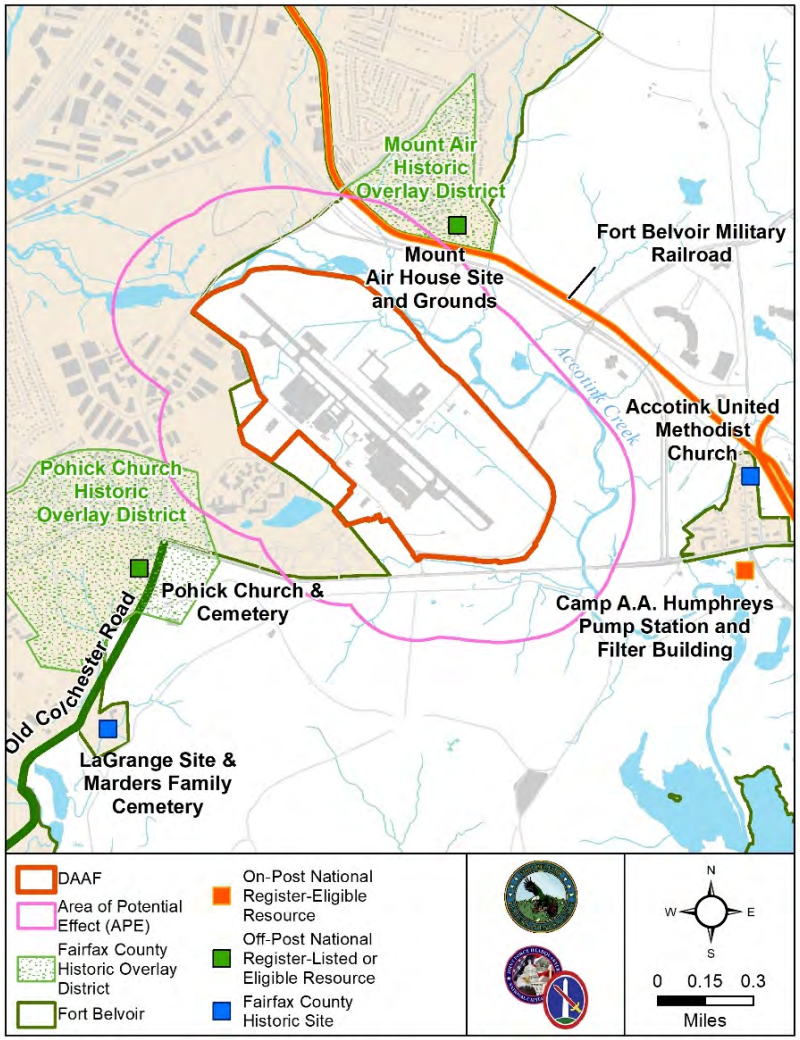
- Overall, most potential impacts from the proposed ADP projects would be **less-than-significant**, and some projects would have beneficial effects.
- Construction of some of the proposed ADP projects would disturb up to 3.6 acres of wetlands on DAAF, resulting in a ***significant adverse impact***. This impact would be mitigated through adherence to mitigation measures that would be specified in federal wetlands permits that would be obtained prior to implementing these projects.
- Some of the proposed ADP projects would permanently encroach on approximately 7 acres of the 100-year floodplain on DAAF. However, this encroachment would not result in substantial changes in flood levels on or downstream of DAAF. Projects would incorporate measures to minimize effects on the floodplain. Floodplain impacts would be **less-than-significant**.
- The Army has prepared a Finding of No Practicable Alternative (FONPA) in accordance with Executive Order (EO) 11988, *Floodplain Management* and EO 11990, *Protection of Wetlands*, explaining its decision and rationale to implement proposed ADP projects in floodplains and wetlands.

Summary of Effects (con't.)

- Noise conditions at the Airfield would generally remain the same as they currently are because the number and types of aircraft operating at DAAF would not change. High-noise zones would remain confined to DAAF.
- The Proposed Action would have some beneficial effects on land use, plans, and aesthetics and visual quality; and the management of hazardous materials and waste at the Airfield.
- Potential impacts from the Proposed Action are fully detailed in the Draft EIS.
- Posters and fact sheets summarizing information in the Draft EIS are available on Fort Belvoir's website at https://home.army.mil/belvoir/index.php/about/Garrison/directorate-public-works/environmental-division.

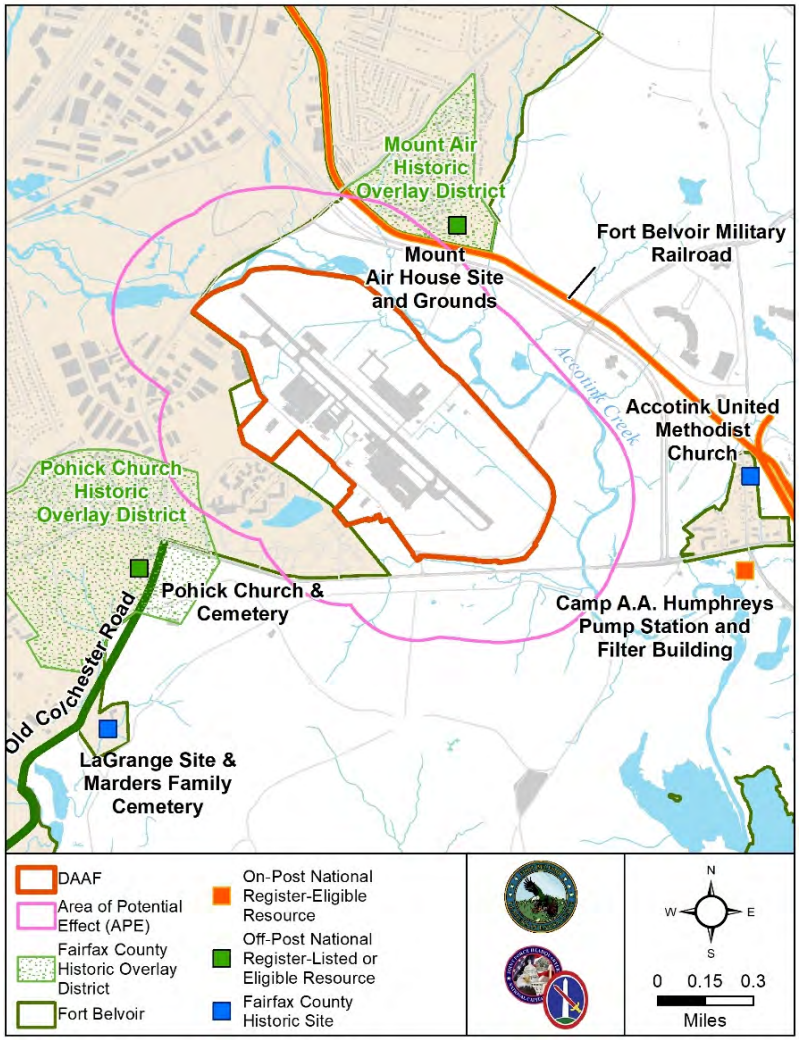
National Historic Preservation Act

- Section 106 of the National Historic Preservation Act requires federal agencies to consider potential effects on historic properties.
- Section 106 also provides opportunities for public involvement and comment.
- Section 106 is a separate process from, but is often conducted in parallel with, the NEPA process.
- Opportunities for public involvement required by Section 106 are also being provided during the DAAF ADP NEPA process.



National Historic Preservation Act

- No DAAF properties have been listed or determined eligible for listing in the National Register of Historic Places.
- Multiple properties listed or determined eligible for listing in the National Register are located outside of DAAF.
- No National Register-listed or eligible properties near DAAF would be affected by the Proposed Action.



How to Comment

The Draft EIS, informational posters and fact sheets, and a form for submitting comments (Microsoft Word file) are available at: https://home.army.mil/belvoir/index.php/about/Garrison/directorate-public-works/environmental-division

Submit comments via email to: FortBelvoirNOI@usace.army.mil

Or via US Postal Service mail to:

US Army Fort Belvoir Directorate of Public Works
Attn.: DAAF Draft EIS
Environmental Division, Chief
9430 Jackson Loop, Building 1442, Rm #230
Fort Belvoir, VA 22060-5116

All comments must be received by **8 September 2020** to be considered in the Final EIS.

Thank you for your interest in the DAAF ADP and the Draft EIS!

Section 106 Consultation

DEPARTMENT OF THE ARMY
US ARMY INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT BELVOIR
9820 FLAGLER ROAD, SUITE 213
FORT BELVOIR, VIRGINIA 22060-5928

OCT 2 3 2019

Directorate of Public Works

SUBJECT: Section 106 Consultation – Environmental Impact Statement (EIS) for the Davison Army Airfield (DAAF) Area Development Plan (ADP), Fort Belvoir, Virginia

Mr. Marc Holma
Architectural Historian
Department of Historic Resources
2801 Kensington Avenue
Richmond, Virginia 23221

Dear Mr. Holma:

The US Army Garrison Fort Belvoir is preparing an EIS for the DAAF ADP. The EIS is being prepared in accordance with the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et. seq.) (NEPA), the Council on Environmental Quality NEPA regulations (40 CFR parts 1500–1508), and the Army's Corps of Engineers NEPA regulation (33 CFR part 230). Accordingly, the Army published a Notice of Intent to prepare the EIS in the Federal Register on April 19, 2018. In response, the State Historic Preservation Officer (SHPO) requested ongoing Section 106 consultation as the project continues to develop.

The Undersecretary of Defense's *Memorandum on Installation Master Plans* stipulates that all installations must develop a master plan in accordance with the Unified Facilities Criteria (UFC) guidance. Fort Belvoir completed a Real Property Master Plan (RPMP) update for the installation in 2014. UFC 2-100-01 was put into effect during the development of the RPMP and it prescribes that installations be divided into identifiable and connected districts based on geographical features, land use patterns, building types, and/or transportation networks. In addition, ADPs should be prepared for those districts. This ADP will provide guidance for future development, construction, demolition, and growth at DAAF and includes proposed projects to implement. Fort Belvoir has determined the Area of Potential Effect (APE) using the final proposed site plan (enclosed) and the buildings to be demolished (APE enclosed).

Fort Belvoir reviewed the ADP and identified historic resources within the limits of disturbance. Within the APE, there are no buildings that are eligible for listing on the National Register of Historic Places (NRHP). Their eligibility was determined in 2009 when Fort Belvoir conducted an architectural survey to evaluate the eligibility of 83 resources for listing in the NRHP. The survey included resources associated with DAAF, which were collectively evaluated as a historic district. The findings of this survey informed Fort Belvoir's determination that the DAAF resources were not eligible for listing on the NRHP.

However, SHPO did not concur with the determination (DHR File No. 2009-0716). To resolve the dispute, Fort Belvoir formally requested the Keeper of the National Register (hereafter, "the Keeper") make a determination of significance for the DAAF buildings in a correspondence dated September 22, 2009. The Keeper requested additional details regarding the airfield's historical role as Executive Flight Detachment headquarters which Fort Belvoir provided in packet received by the Keeper on January 26, 2010. Fort Belvoir's original determination of significance received concurrence from the Keeper on March 12, 2010.

Fort Belvoir identified two NRHP-eligible features located in proximity to the undertaking: the Camp A.A. Humphreys Pump Station and Filter Building, located 0.5 miles southeast of DAAF (VDHR ID No. 029-0096), and the Fort Belvoir Military Railroad Historic Corridor (VDHR ID No. 029-5724) which has a railroad segment located approximately 0.2 miles from DAAF. In addition to architectural resources, Fort Belvoir identified archaeological sites close to the APE: Sites 44FX0035, 44FX1938, 44FX1939, 44FX1811, 44FX1937, 44FX1940, and 44FX1949. With the exception of one ineligible site, 44FX1811, the archaeological sites are separated from the APE by the Accotink Creek and will not be affected by ground disturbing activities.

Fort Belvoir has also identified historic properties in proximity to the undertaking that are listed or are eligible for listing on the NRHP outside of Army jurisdiction such as: Old Colchester Road, Pohick Church and Cemetery, the Pohick Church Overlay Historic District, the Accotink Methodist Church, Lagrange Site, the Marders Family Cemetery and the Mount Air House Site and Overlay District. Neither these historic properties nor their viewsheds will be affected by the ADP.

The ADP proposes the implementation of up to 24 construction, renovation, demolition, and infrastructure projects that will improve the airfield as well as ensure compliance with applicable regulations. The proposed projects would include the modernization of up to seven existing buildings and structures, construction of up to 13 buildings and structures, and demolition of up to 37 existing buildings and structures to remove unneeded or redundant facilities (Proposed Site Plan enclosed). These projects are organized by the different time frames in which they will be accomplished: short-range, mid-range, and long-range.

The short-range projects proposed by the ADP are to be completed within the next 10 years. These projects include: Modernize Building 3121, Washington DC Army National Guard (DCARNG) Airfield Operations Section; Modernize Building 3145, Operational Support Airlift Activity (OSA-A)/Operational Support Airlift Command (OSACOM) Hangar; Modernize Building 3151, Airfield Division, 12th AV BN D Company Hangar; Modernize Building 3232, 12th AV BN C Company Hangar; Realign Santjer Road and Gavin Road; Construct 12th AV BN 8-Bay Aircraft Maintenance Hangar; Construct North Taxiway Connection; Remove Earthen Knoll and Construct Runway Safety Overrun.

Projects considered to be mid-range will be completed in the next 11 to 20 years. These proposed projects include: Modernize and Expand Building 3146; Construct 12th AV BN 10-Bay Storage Hangar; Construct 12th AV BN 4-Bay Storage Hangar and Secondary Parking Lot; Construct 12th AV BN Aircraft Paint Shop; Modernize and Expand Building 3123, DCARNG Readiness Center; Construct DCARNG Aircraft Wash Rack; Modernize Building 3165, OSA-A/OSACOM Operations Facility; Relocate Night Vision and Electronic Sensors Directorate (NVESD), and Expand Aircraft Parking Apron.

The long-range ADP projects will be completed in the next 21 to 30 years. These projects include: Replace Farrar Gate Access Control Point and Install Redundant Communications Line; Construct NVESD Hangar; Construct OSA-A / OSACOM Operational Flight Division Hangar; Construct OSA-A/OSACOM Operations Facility; Construct Perimeter Road Multi-purpose Trail, and Construct Alternative Perimeter Road.

Recognizing the number of parties that could potentially be affected by the implementation of the proposed ADP, Fort Belvoir has made efforts to involve the public throughout its development. Fort Belvoir received comments from Fairfax County Department of Planning and Zoning, the Advisory Council on Historic Preservation, the Catawba Indian Nation, and the National Trust for Historic Preservation. In accordance with 36CFR800.6(a)(1), Fort Belvoir will continue to consult with these parties as well as the Tuscarora Nation, United Keetoowah Band of Cherokee Indians in Oklahoma, Eastern Band of Cherokee Indians, Pamunkey Indian Tribe, Chickahominy Indian Tribe, Chickahominy Indian Tribe Eastern Division, Upper Mattaponi Tribe, Rappahannock Tribe, Monacan Indian Nation, the Nansemond Indian Nation and other potentially interested parties as projects are initiated. Fort Belvoir has applied the criteria of adverse effect to the implementation of the proposed ADP and determined the projects will not have an adverse effect to historic properties [36 CFR § 800.5].

Point of contact is Mr. Christopher W. Landgraf, Acting Director of Public Works, at 703-806-4194.

Sincerely,

Michael H. Greenberg
Colonel, U.S. Army
Commanding

Enclosures

DEPARTMENT OF THE ARMY
US ARMY INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT BELVOIR
9820 FLAGLER ROAD, SUITE 213
FORT BELVOIR, VIRGINIA 22060-5928

OCT 29 2019

Directorate of Public Works

SUBJECT: Section 106 Consultation – Environmental Impact Statement (EIS) for the Davison Army Airfield (DAAF) Area Development Plan (ADP), Fort Belvoir, Virginia

Ms. Caitlin Rogers
Catawba Indian Nation
Tribal Historic Preservation Office
1536 Tom Steven Road
Rock Hill, South Carolina 29730

Dear Ms. Rogers:

The US Army Garrison Fort Belvoir is preparing an EIS for the DAAF ADP. The EIS is being prepared in accordance with the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et. seq.) (NEPA), the Council on Environmental Quality NEPA regulations (40 CFR parts 1500–1508), and the Army's Corps of Engineers NEPA regulation (33 CFR part 230). Accordingly, the Army published a Notice of Intent to prepare the EIS in the Federal Register on April 19, 2018. In response, the State Historic Preservation Officer (SHPO) requested ongoing Section 106 consultation as the project continues to develop.

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Point of contact is Mr. Christopher W. Landgraf, Acting Director of Public Works, at 703-806-4194.

Sincerely,

Michael H. Greenberg
Colonel, U.S. Army
Commanding

Enclosures

DEPARTMENT OF THE ARMY
US ARMY INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT BELVOIR
9820 FLAGLER ROAD, SUITE 213
FORT BELVOIR, VIRGINIA 22060-5928

OCT 29 2019

Directorate of Public Works

SUBJECT: Section 106 Consultation – Environmental Impact Statement (EIS) for the Davison Army Airfield (DAAF) Area Development Plan (ADP), Fort Belvoir, Virginia

Principal Chief Richard Sneed
Eastern Band of Cherokee Indians
Qualla Boundary P.O. Box 455
Cherokee, North Carolina 28719

Dear Principal Chief Sneed:

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However, SHPO did not concur with the determination (DHR File No. 2009-0716). To resolve the dispute, Fort Belvoir formally requested the Keeper of the National Register (hereafter, "the Keeper") make a determination of significance for the DAAF buildings in a correspondence dated September 22, 2009. The Keeper requested additional details regarding the airfield's historical role as Executive Flight Detachment headquarters which Fort Belvoir provided in packet received by the Keeper on January 26, 2010. Fort Belvoir's original determination of significance received concurrence from the Keeper on March 12, 2010.

Fort Belvoir identified two NRHP-eligible features located in proximity to the undertaking: the Camp A.A. Humphreys Pump Station and Filter Building, located 0.5 miles southeast of DAAF (VDHR ID No. 029-0096), and the Fort Belvoir Military Railroad Historic Corridor (VDHR ID No. 029-5724) which has a railroad segment located approximately 0.2 miles from DAAF. In addition to architectural resources, Fort Belvoir identified archaeological sites close to the APE: Sites 44FX0035, 44FX1938, 44FX1939, 44FX1811, 44FX1937, 44FX1940, and 44FX1949. With the exception of one ineligible site, 44FX1811, the archaeological sites are separated from the APE by the Accotink Creek and will not be affected by ground disturbing activities.

Fort Belvoir has also identified historic properties in proximity to the undertaking that are listed or are eligible for listing on the NRHP outside of Army jurisdiction such as: Old Colchester Road, Pohick Church and Cemetery, the Pohick Church Overlay Historic District, the Accotink Methodist Church, Lagrange Site, the Marders Family Cemetery and the Mount Air House Site and Overlay District. Neither these historic properties nor their viewsheds will be affected by the ADP.

The ADP proposes the implementation of up to 24 construction, renovation, demolition, and infrastructure projects that will improve the airfield as well as ensure compliance with applicable regulations. The proposed projects would include the modernization of up to seven existing buildings and structures, construction of up to 13 buildings and structures, and demolition of up to 37 existing buildings and structures to remove unneeded or redundant facilities (Proposed Site Plan enclosed). These projects are organized by the different time frames in which they will be accomplished: short-range, mid-range, and long-range.

The short-range projects proposed by the ADP are to be completed within the next 10 years. These projects include: Modernize Building 3121, Washington DC Army National Guard (DCARNG) Airfield Operations Section; Modernize Building 3145, Operational Support Airlift Activity (OSA-A)/Operational Support Airlift Command (OSACOM) Hangar; Modernize Building 3151, Airfield Division, 12th AV BN D Company Hangar; Modernize Building 3232, 12th AV BN C Company Hangar; Realign Santjer Road and Gavin Road; Construct 12th AV BN 8-Bay Aircraft Maintenance Hangar; Construct North Taxiway Connection; Remove Earthen Knoll and Construct Runway Safety Overrun.

Projects considered to be Mid-range will be completed in the next 11 to 20 years. These proposed projects include: Modernize and Expand Building 3146; Construct 12th AV BN 10-Bay Storage Hangar; Construct 12th AV BN 4-Bay Storage Hangar and Secondary Parking Lot; Construct 12th AV BN Aircraft Paint Shop; Modernize and Expand Building 3123, DCARNG Readiness Center; Construct DCARNG Aircraft Wash Rack; Modernize Building 3165, OSA-A/OSACOM Operations Facility; Relocate Night Vision and Electronic Sensors Directorate (NVESD), and Expand Aircraft Parking Apron.

The long-range ADP projects will be completed in the next 21 to 30 years. These projects include: Replace Farrar Gate Access Control Point and Install Redundant Communications Line; Construct NVESD Hangar; Construct OSA-A / OSACOM Operational Flight Division Hangar; Construct OSA-A/OSACOM Operations Facility; Construct Perimeter Road Multi-purpose Trail, and Construct Alternative Perimeter Road.

Recognizing the number of parties that could potentially be affected by the implementation of the proposed ADP, Fort Belvoir has made efforts to involve the public throughout its development. Fort Belvoir received comments from Fairfax County Department of Planning and Zoning, the Advisory Council on Historic Preservation, the Catawba Indian Nation, and the National Trust for Historic Preservation. In accordance with 36CFR800.6(a)(1), Fort Belvoir will continue to consult with these parties as well as the Tuscarora Nation, United Keetoowah Band of Cherokee Indians in Oklahoma, Catawba Indian Nation, Pamunkey Indian Tribe, Chickahominy Indian Tribe, Chickahominy Indian Tribe Eastern Division, Upper Mattaponi Tribe, Rappahannock Tribe, Monacan Indian Nation, the Nansemond Indian Nation and other potentially interested parties. Fort Belvoir has applied the criteria of adverse effect to the implementation of the proposed ADP and determined that the listed projects will not have an adverse effect to historic properties [36 CFR § 800.5].

Point of contact is Mr. Christopher W. Landgraf, Acting Director of Public Works, at 703-806-4194.

Sincerely,

Michael H. Greenberg
Colonel, U.S. Army
Commanding

Enclosures

DEPARTMENT OF THE ARMY
US ARMY INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT BELVOIR
9820 FLAGLER ROAD, SUITE 213
FORT BELVOIR, VIRGINIA 22060-5928
OCT 29 2019

Directorate of Public Works

SUBJECT: Section 106 Consultation – Environmental Impact Statement (EIS) for the Davison Army Airfield (DAAF) Area Development Plan (ADP), Fort Belvoir, Virginia

Chief Joe Bunch
United Keetowah of Cherokee Indians in Oklahoma
P.O. Box 746
Tahlequah, Oklahoma 74465

Dear Chief Bunch:

The US Army Garrison Fort Belvoir is preparing an EIS for the DAAF ADP. The EIS is being prepared in accordance with the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et. seq.) (NEPA), the Council on Environmental Quality NEPA regulations (40 CFR parts 1500–1508), and the Army's Corps of Engineers NEPA regulation (33 CFR part 230). Accordingly, the Army published a Notice of Intent to prepare the EIS in the Federal Register on April 19, 2018. In response, the State Historic Preservation Officer (SHPO) requested ongoing Section 106 consultation as the project continues to develop.

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Point of contact is Mr. Christopher W. Landgraf, Acting Director of Public Works, at 703-806-4194.

Sincerely,

Michael H. Greenberg
Colonel, U.S. Army
Commanding

Enclosures

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US ARMY INSTALLATION MANAGEMENT COMMAND
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9820 FLAGLER ROAD, SUITE 213
FORT BELVOIR, VIRGINIA 22060-5928

OCT 29 2019

Directorate of Public Works

SUBJECT: Section 106 Consultation – Environmental Impact Statement (EIS) for the Davison Army Airfield (DAAF) Area Development Plan (ADP), Fort Belvoir, Virginia

Chief Robert Gray
Pamunkey Indian Tribe
1054 Pochahontas Trail
King William, Virginia 23086

Dear Chief Gray:

The US Army Garrison Fort Belvoir is preparing an EIS for the DAAF ADP. The EIS is being prepared in accordance with the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et. seq.) (NEPA), the Council on Environmental Quality NEPA regulations (40 CFR parts 1500–1508), and the Army's Corps of Engineers NEPA regulation (33 CFR part 230). Accordingly, the Army published a Notice of Intent to prepare the EIS in the Federal Register on April 19, 2018. In response, the State Historic Preservation Officer (SHPO) requested ongoing Section 106 consultation as the project continues to develop.

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Sincerely,

Michael H. Greenberg
Colonel, U.S. Army
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Enclosures

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HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT BELVOIR
9820 FLAGLER ROAD, SUITE 213
FORT BELVOIR, VIRGINIA 22060-5928

OCT 29 2019

Directorate of Public Works

SUBJECT: Section 106 Consultation – Environmental Impact Statement (EIS) for the Davison Army Airfield (DAAF) Area Development Plan (ADP), Fort Belvoir, Virginia

Chief Leo Henry
Tuscarora Nation of New York
2006 Mt. Hope Road
Lewistown, New York 14092

Dear Chief Henry:

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Enclosures

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FORT BELVOIR, VIRGINIA 22060-5928

OCT 29 2019

Directorate of Public Works

SUBJECT: Section 106 Consultation – Environmental Impact Statement (EIS) for the Davison Army Airfield (DAAF) Area Development Plan (ADP), Fort Belvoir, Virginia

Chief Stephen R. Adkins
Chickahominy Indian Tribe
8200 Lott Cary Road
Providence Forge, Virginia 23140

Dear Chief Adkins:

The US Army Garrison Fort Belvoir is preparing an EIS for the DAAF ADP. The EIS is being prepared in accordance with the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et. seq.) (NEPA), the Council on Environmental Quality NEPA regulations (40 CFR parts 1500–1508), and the Army's Corps of Engineers NEPA regulation (33 CFR part 230). Accordingly, the Army published a Notice of Intent to prepare the EIS in the Federal Register on April 19, 2018. In response, the State Historic Preservation Officer (SHPO) requested ongoing Section 106 consultation as the project continues to develop.

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HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT BELVOIR
9820 FLAGLER ROAD, SUITE 213
FORT BELVOIR, VIRGINIA 22060-5928

Directorate of Public Works

SUBJECT: Section 106 Consultation – Environmental Impact Statement (EIS) for the Davison Army Airfield (DAAF) Area Development Plan (ADP), Fort Belvoir, Virginia

Chief Joe Bunch
United Keetowah of Cherokee Indians in Oklahoma
P.O. Box 746
Tahlequah, Oklahoma 74465

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Projects considered to be mid-range will be completed in the next 11 to 20 years. These proposed projects include: Modernize and Expand Building 3146; Construct 12th AV BN 10-Bay Storage Hangar; Construct 12th AV BN 4-Bay Storage Hangar and Secondary Parking Lot; Construct 12th AV BN Aircraft Paint Shop; Modernize and Expand Building 3123, DCARNG Readiness Center; Construct DCARNG Aircraft Wash Rack; Modernize Building 3165, OSA-A/OSACOM Operations Facility; Relocate Night Vision and Electronic Sensors Directorate (NVESD), and Expand Aircraft Parking Apron.

The long-range ADP projects will be completed in the next 21 to 30 years. These projects include: Replace Farrar Gate Access Control Point and Install Redundant Communications Line; Construct NVESD Hangar; Construct OSA-A / OSACOM Operational Flight Division Hangar; Construct OSA-A/OSACOM Operations Facility; Construct Perimeter Road Multi-purpose Trail, and Construct Alternative Perimeter Road.

Recognizing the number of parties that could potentially be affected by the implementation of the proposed ADP, Fort Belvoir has made efforts to involve the public throughout its development. Fort Belvoir received comments from Fairfax County Department of Planning and Zoning, the Advisory Council on Historic Preservation, the Catawba Indian Nation, and the National Trust for Historic Preservation. In accordance with 36CFR800.6(a)(1), Fort Belvoir will continue to consult with these parties as well as the Tuscarora Nation, United Keetoowah Band of Cherokee Indians in Oklahoma, Eastern Band of Cherokee Indians, Pamunkey Indian Tribe, Chickahominy Indian Tribe Eastern Division, Upper Mattaponi Tribe, Rappahannock Tribe, Monacan Indian Nation, the Nansemond Indian Nation and other potentially interested parties. Fort Belvoir has applied the criteria of adverse effect to the implementation of the proposed ADP and determined that the listed projects will not have an adverse effect to historic properties [36 CFR § 800.5].

Point of contact is Mr. Christopher W. Landgraf, Acting Director of Public Works, at 703-806-4194.

Sincerely,

Michael H. Greenberg
Colonel, U.S. Army
Commanding

Enclosures

DEPARTMENT OF THE ARMY
US ARMY INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT BELVOIR
9820 FLAGLER ROAD, SUITE 213
FORT BELVOIR, VIRGINIA 22060-5928

OCT 29 2019

Directorate of Public Works

SUBJECT: Section 106 Consultation –Environmental Impact Statement (EIS) for the Davison Army Airfield (DAAF) Area Development Plan (ADP), Fort Belvoir, Virginia

Chief Frank Adams
Upper Mattaponi Indian Tribe
P.O. Box 184
King William, Virginia 23086

Dear Chief Adams:

The US Army Garrison Fort Belvoir is preparing an EIS for the DAAF ADP. The EIS is being prepared in accordance with the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et. seq.) (NEPA), the Council on Environmental Quality NEPA regulations (40 CFR parts 1500–1508), and the Army's Corps of Engineers NEPA regulation (33 CFR part 230). Accordingly, the Army published a Notice of Intent to prepare the EIS in the Federal Register on April 19, 2018. In response, the State Historic Preservation Officer (SHPO) requested ongoing Section 106 consultation as the project continues to develop.

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However, SHPO did not concur with the determination (DHR File No. 2009-0716). To resolve the dispute, Fort Belvoir formally requested the Keeper of the National Register (hereafter, "the Keeper") make a determination of significance for the DAAF buildings in a correspondence dated September 22, 2009. The Keeper requested additional details regarding the airfield's historical role as Executive Flight Detachment headquarters which Fort Belvoir provided in packet received by the Keeper on January 26, 2010. Fort Belvoir's original determination of significance received concurrence from the Keeper on March 12, 2010.

Fort Belvoir identified two NRHP-eligible features located in proximity to the undertaking: the Camp A.A. Humphreys Pump Station and Filter Building, located 0.5 miles southeast of DAAF (VDHR ID No. 029-0096), and the Fort Belvoir Military Railroad Historic Corridor (VDHR ID No. 029-5724) which has a railroad segment located approximately 0.2 miles from DAAF. In addition to architectural resources, Fort Belvoir identified archaeological sites close to the APE: Sites 44FX0035, 44FX1938, 44FX1939, 44FX1811, 44FX1937, 44FX1940, and 44FX1949. With the exception of one ineligible site, 44FX1811, the archaeological sites are separated from the APE by the Accotink Creek and will not be affected by ground disturbing activities.

Fort Belvoir has also identified historic properties in proximity to the undertaking that are listed or are eligible for listing on the NRHP outside of Army jurisdiction such as: Old Colchester Road, Pohick Church and Cemetery, the Pohick Church Overlay Historic District, the Accotink Methodist Church, Lagrange Site, the Marders Family Cemetery and the Mount Air House Site and Overlay District. Neither these historic properties nor their viewsheds will be affected by the ADP.

The ADP proposes the implementation of up to 24 construction, renovation, demolition, and infrastructure projects that will improve the airfield as well as ensure compliance with applicable regulations. The proposed projects would include the modernization of up to seven existing buildings and structures, construction of up to 13 buildings and structures, and demolition of up to 37 existing buildings and structures to remove unneeded or redundant facilities (Proposed Site Plan enclosed). These projects are organized by the different time frames in which they will be accomplished: short-range, mid-range, and long-range.

The short-range projects proposed by the ADP are to be completed within the next 10 years. These projects include: Modernize Building 3121, Washington DC Army National Guard (DCARNG) Airfield Operations Section; Modernize Building 3145, Operational Support Airlift Activity (OSA-A)/Operational Support Airlift Command (OSACOM) Hangar; Modernize Building 3151, Airfield Division, 12th AV BN D Company Hangar; Modernize Building 3232, 12th AV BN C Company Hangar; Realign Santjer Road and Gavin Road; Construct 12th AV BN 8-Bay Aircraft Maintenance Hangar; Construct North Taxiway Connection; Remove Earthen Knoll and Construct Runway Safety Overrun.

Projects considered to be mid-range will be completed in the next 11 to 20 years. These proposed projects include: Modernize and Expand Building 3146; Construct 12th AV BN 10-Bay Storage Hangar; Construct 12th AV BN 4-Bay Storage Hangar and Secondary Parking Lot; Construct 12th AV BN Aircraft Paint Shop; Modernize and Expand Building 3123, DCARNG Readiness Center; Construct DCARNG Aircraft Wash Rack; Modernize Building 3165, OSA-A/OSACOM Operations Facility; Relocate Night Vision and Electronic Sensors Directorate (NVESD), and Expand Aircraft Parking Apron.

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Point of contact is Mr. Christopher W. Landgraf, Acting Director of Public Works, at 703-806-4194.

Sincerely,

Michael H. Greenberg
Colonel, U.S. Army
Commanding

Enclosures

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FORT BELVOIR, VIRGINIA 22060-5928

OCT 29 2019

Directorate of Public Works

SUBJECT: Section 106 Consultation – Environmental Impact Statement (EIS) for the Davison Army Airfield (DAAF) Area Development Plan (ADP), Fort Belvoir, Virginia

Assistant Chief Gerald Stewart
Chickahominy Indians Eastern Division
2895 Mt. Pleasant Road
Providence Forge, Virginia 23140

Dear Assistant Chief Stewart:

The US Army Garrison Fort Belvoir is preparing an EIS for the DAAF ADP. The EIS is being prepared in accordance with the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et. seq.) (NEPA), the Council on Environmental Quality NEPA regulations (40 CFR parts 1500–1508), and the Army's Corps of Engineers NEPA regulation (33 CFR part 230). Accordingly, the Army published a Notice of Intent to prepare the EIS in the Federal Register on April 19, 2018. In response, the State Historic Preservation Officer (SHPO) requested ongoing Section 106 consultation as the project continues to develop.

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However, SHPO did not concur with the determination (DHR File No. 2009-0716). To resolve the dispute, Fort Belvoir formally requested the Keeper of the National Register (hereafter, "the Keeper") make a determination of significance for the DAAF buildings in a correspondence dated September 22, 2009. The Keeper requested additional details regarding the airfield's historical role as Executive Flight Detachment headquarters which Fort Belvoir provided in packet received by the Keeper on January 26, 2010. Fort Belvoir's original determination of significance received concurrence from the Keeper on March 12, 2010.

Fort Belvoir identified two NRHP-eligible features located in proximity to the undertaking: the Camp A.A. Humphreys Pump Station and Filter Building, located 0.5 miles southeast of DAAF (VDHR ID No. 029-0096), and the Fort Belvoir Military Railroad Historic Corridor (VDHR ID No. 029-5724) which has a railroad segment located approximately 0.2 miles from DAAF. In addition to architectural resources, Fort Belvoir identified archaeological sites close to the APE: Sites 44FX0035, 44FX1938, 44FX1939, 44FX1811, 44FX1937, 44FX1940, and 44FX1949. With the exception of one ineligible site, 44FX1811, the archaeological sites are separated from the APE by the Accotink Creek and will not be affected by ground disturbing activities.

Fort Belvoir has also identified historic properties in proximity to the undertaking that are listed or are eligible for listing on the NRHP outside of Army jurisdiction such as: Old Colchester Road, Pohick Church and Cemetery, the Pohick Church Overlay Historic District, the Accotink Methodist Church, Lagrange Site, the Marders Family Cemetery and the Mount Air House Site and Overlay District. Neither these historic properties nor their viewsheds will be affected by the ADP.

The ADP proposes the implementation of up to 24 construction, renovation, demolition, and infrastructure projects that will improve the airfield as well as ensure compliance with applicable regulations. The proposed projects would include the modernization of up to seven existing buildings and structures, construction of up to 13 buildings and structures, and demolition of up to 37 existing buildings and structures to remove unneeded or redundant facilities (Proposed Site Plan enclosed). These projects are organized by the different time frames in which they will be accomplished: short-range, mid-range, and long-range.

The short-range projects proposed by the ADP are to be completed within the next 10 years. These projects include: Modernize Building 3121, Washington DC Army National Guard (DCARNG) Airfield Operations Section; Modernize Building 3145, Operational Support Airlift Activity (OSA-A)/Operational Support Airlift Command (OSACOM) Hangar; Modernize Building 3151, Airfield Division, 12th AV BN D Company Hangar; Modernize Building 3232, 12th AV BN C Company Hangar; Realign Santjer Road and Gavin Road; Construct 12th AV BN 8-Bay Aircraft Maintenance Hangar; Construct North Taxiway Connection; Remove Earthen Knoll and Construct Runway Safety Overrun.

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Point of contact is Mr. Christopher W. Landgraf, Acting Director of Public Works, at 703-806-4194.

Sincerely,

Michael H. Greenberg
Colonel, U.S. Army
Commanding

Enclosures

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US ARMY INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT BELVOIR
9820 FLAGLER ROAD, SUITE 213
FORT BELVOIR, VIRGINIA 22060-5928

OCT 29 2019

Directorate of Public Works

SUBJECT: Section 106 Consultation – Environmental Impact Statement (EIS) for the Davison Army Airfield (DAAF) Area Development Plan (ADP), Fort Belvoir, Virginia

Chief Anne Richardson
Rappahannock Tribe
5036 Indian Neck Road
Indian Neck, Virginia 23148

Dear Chief Richardson:

The US Army Garrison Fort Belvoir is preparing an EIS for the DAAF ADP. The EIS is being prepared in accordance with the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et. seq.) (NEPA), the Council on Environmental Quality NEPA regulations (40 CFR parts 1500–1508), and the Army's Corps of Engineers NEPA regulation (33 CFR part 230). Accordingly, the Army published a Notice of Intent to prepare the EIS in the Federal Register on April 19, 2018. In response, the State Historic Preservation Officer (SHPO) requested ongoing Section 106 consultation as the project continues to develop.

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Point of contact is Mr. Christopher W. Landgraf, Acting Director of Public Works, at 703-806-4194.

Sincerely,

Michael H. Greenberg
Colonel, U.S. Army
Commanding

Enclosures

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US ARMY INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT BELVOIR
9820 FLAGLER ROAD, SUITE 213
FORT BELVOIR, VIRGINIA 22060-5928

OCT 29 2019

Directorate of Public Works

SUBJECT: Section 106 Consultation – Environmental Impact Statement (EIS) for the Davison Army Airfield (DAAF) Area Development Plan (ADP), Fort Belvoir, Virginia

Tribal Chief Dean Branham
Monacan Indian Nation
P.O. Box 960
Amherst, Virginia 24571

Dear Tribal Chief Branham:

The US Army Garrison Fort Belvoir is preparing an EIS for the DAAF ADP. The EIS is being prepared in accordance with the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et. seq.) (NEPA), the Council on Environmental Quality NEPA regulations (40 CFR parts 1500–1508), and the Army's Corps of Engineers NEPA regulation (33 CFR part 230). Accordingly, the Army published a Notice of Intent to prepare the EIS in the Federal Register on April 19, 2018. In response, the State Historic Preservation Officer (SHPO) requested ongoing Section 106 consultation as the project continues to develop.

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HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT BELVOIR
9820 FLAGLER ROAD, SUITE 213
FORT BELVOIR, VIRGINIA 22060-5928

OCT 29 2019

Directorate of Public Works

SUBJECT: Section 106 Consultation – Environmental Impact Statement (EIS) for the Davison Army Airfield (DAAF) Area Development Plan (ADP), Fort Belvoir, Virginia

Chief Samuel Bass
Nansemond Indian Tribe
1001 Pembroke Lane
Suffolk, Virginia 23434

Dear Chief Bass:

The US Army Garrison Fort Belvoir is preparing an EIS for the DAAF ADP. The EIS is being prepared in accordance with the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et. seq.) (NEPA), the Council on Environmental Quality NEPA regulations (40 CFR parts 1500–1508), and the Army's Corps of Engineers NEPA regulation (33 CFR part 230). Accordingly, the Army published a Notice of Intent to prepare the EIS in the Federal Register on April 19, 2018. In response, the State Historic Preservation Officer (SHPO) requested ongoing Section 106 consultation as the project continues to develop.

The Undersecretary of Defense's *Memorandum on Installation Master Plans* stipulates that all installations must develop a master plan in accordance with the Unified Facilities Criteria (UFC) guidance. Fort Belvoir completed a Real Property Master Plan (RPMP) update for the installation in 2014. UFC 2-100-01 was put into effect during the development of the RPMP and it prescribes that installations be divided into identifiable and connected districts based on geographical features, land use patterns, building types, and/or transportation networks. In addition, ADPs should be prepared for those districts. This ADP will provide guidance for future development, construction, demolition, and growth at DAAF and includes proposed projects to implement. Fort Belvoir has determined the Area of Potential Effect (APE) using the final proposed site plan (enclosed) and the buildings to be demolished (APE enclosed).

Fort Belvoir reviewed the ADP and identified historic resources within the limits of disturbance. Within the APE, there are no buildings that are eligible for listing on the National Register of Historic Places (NRHP). Their eligibility was determined in 2009 when Fort Belvoir conducted an architectural survey to evaluate the eligibility of 83 resources for listing in the NRHP. The survey included resources associated with DAAF, which were collectively evaluated as a historic district. The findings of this survey informed Fort Belvoir's determination that the DAAF resources were not eligible for listing on the NRHP.

However, SHPO did not concur with the determination (DHR File No. 2009-0716). To resolve the dispute, Fort Belvoir formally requested the Keeper of the National Register (hereafter, "the Keeper") make a determination of significance for the DAAF buildings in a correspondence dated September 22, 2009. The Keeper requested additional details regarding the airfield's historical role as Executive Flight Detachment headquarters which Fort Belvoir provided in packet received by the Keeper on January 26, 2010. Fort Belvoir's original determination of significance received concurrence from the Keeper on March 12, 2010.

Fort Belvoir identified two NRHP-eligible features located in proximity to the undertaking: the Camp A.A. Humphreys Pump Station and Filter Building, located 0.5 miles southeast of DAAF (VDHR ID No. 029-0096), and the Fort Belvoir Military Railroad Historic Corridor (VDHR ID No. 029-5724) which has a railroad segment located approximately 0.2 miles from DAAF. In addition to architectural resources, Fort Belvoir identified archaeological sites close to the APE: Sites 44FX0035, 44FX1938, 44FX1939, 44FX1811, 44FX1937, 44FX1940, and 44FX1949. With the exception of one ineligible site, 44FX1811, the archaeological sites are separated from the APE by the Accotink Creek and will not be affected by ground disturbing activities.

Fort Belvoir has also identified historic properties in proximity to the undertaking that are listed or are eligible for listing on the NRHP outside of Army jurisdiction such as: Old Colchester Road, Pohick Church and Cemetery, the Pohick Church Overlay Historic District, the Accotink Methodist Church, Lagrange Site, the Marders Family Cemetery and the Mount Air House Site and Overlay District. Neither these historic properties nor their viewsheds will be affected by the ADP.

The ADP proposes the implementation of up to 24 construction, renovation, demolition, and infrastructure projects that will improve the airfield as well as ensure compliance with applicable regulations. The proposed projects would include the modernization of up to seven existing buildings and structures, construction of up to 13 buildings and structures, and demolition of up to 37 existing buildings and structures to remove unneeded or redundant facilities (Proposed Site Plan enclosed). These projects are organized by the different time frames in which they will be accomplished: short-range, mid-range, and long-range.

The short-range projects proposed by the ADP are to be completed within the next 10 years. These projects include: Modernize Building 3121, Washington DC Army National Guard (DCARNG) Airfield Operations Section; Modernize Building 3145, Operational Support Airlift Activity (OSA-A)/Operational Support Airlift Command (OSACOM) Hangar; Modernize Building 3151, Airfield Division, 12th AV BN D Company Hangar; Modernize Building 3232, 12th AV BN C Company Hangar; Realign Santjer Road and Gavin Road; Construct 12th AV BN 8-Bay Aircraft Maintenance Hangar; Construct North Taxiway Connection; Remove Earthen Knoll and Construct Runway Safety Overrun.

Projects considered to be Mid-range will be completed in the next 11 to 20 years. These proposed projects include: Modernize and Expand Building 3146; Construct 12th AV BN 10-Bay Storage Hangar; Construct 12th AV BN 4-Bay Storage Hangar and Secondary Parking Lot; Construct 12th AV BN Aircraft Paint Shop; Modernize and Expand Building 3123, DCARNG Readiness Center; Construct DCARNG Aircraft Wash Rack; Modernize Building 3165, OSA-A/OSACOM Operations Facility; Relocate Night Vision and Electronic Sensors Directorate (NVESD), and Expand Aircraft Parking Apron.

The Long-Range ADP projects will be completed in the next 21 to 30 years. These projects include: Replace Farrar Gate Access Control Point and Install Redundant Communications Line; Construct NVESD Hangar; Construct OSA-A / OSACOM Operational Flight Division Hangar; Construct OSA-A/OSACOM Operations Facility; Construct Perimeter Road Multi-purpose Trail, and Construct Alternative Perimeter Road.

Recognizing the number of parties that could potentially be affected by the implementation of the proposed ADP, Fort Belvoir has made efforts to involve the public throughout its development. Fort Belvoir received comments from Fairfax County Department of Planning and Zoning, the Advisory Council on Historic Preservation, the Catawba Indian Nation, and the National Trust for Historic Preservation. In accordance with 36CFR800.6(a)(1), Fort Belvoir will continue to consult with these parties as well as the Tuscarora Nation, United Keetoowah Band of Cherokee Indians in Oklahoma, Eastern Band of Cherokee Indians, Pamunkey Indian Tribe, Chickahominy Indian Tribe, Chickahominy Indian Tribe Eastern Division, Upper Mattaponi Tribe, Rappahannock Tribe, Monacan Indian Nation and other potentially interested parties. Fort Belvoir has applied the criteria of adverse effect to the implementation of the proposed ADP and determined that the listed projects will not have an adverse effect to historic properties [36 CFR § 800.5].

Point of contact is Mr. Christopher W. Landgraf, Acting Director of Public Works, at 703-806-4194.

Sincerely,

Michael H. Greenberg
Colonel, U.S. Army
Commanding

Enclosures

DEPARTMENT OF THE ARMY
US ARMY INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT BELVOIR
9820 FLAGLER ROAD, SUITE 213
FORT BELVOIR, VIRGINIA 22060-5928
OCT 29 2019

Directorate of Public Works

SUBJECT: Section 106 Consultation – Environmental Impact Statement (EIS) for the Davison Army Airfield (DAAF) Area Development Plan (ADP), Fort Belvoir, Virginia

Mr. Christopher Daniel
Program Analyst
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington DC 20001-2637

Dear Mr. Daniel:

The US Army Garrison Fort Belvoir is preparing an EIS for the DAAF ADP. The EIS is being prepared in accordance with the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et. seq.) (NEPA), the Council on Environmental Quality NEPA regulations (40 CFR parts 1500–1508), and the Army's Corps of Engineers NEPA regulation (33 CFR part 230). Accordingly, the Army published a Notice of Intent to prepare the EIS in the Federal Register on April 19, 2018. In response, the State Historic Preservation Officer (SHPO) requested ongoing Section 106 consultation as the project continues to develop.

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However, SHPO did not concur with the determination (DHR File No. 2009-0716). To resolve the dispute, Fort Belvoir formally requested the Keeper of the National Register (hereafter, "the Keeper") make a determination of significance for the DAAF buildings in a correspondence dated September 22, 2009. The Keeper requested additional details regarding the airfield's historical role as Executive Flight Detachment headquarters which Fort Belvoir provided in packet received by the Keeper on January 26, 2010. Fort Belvoir's original determination of significance received concurrence from the Keeper on March 12, 2010.

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Point of contact is Mr. Christopher W. Landgraf, Acting Director of Public Works, at 703-806-4194.

Sincerely,

Michael H. Greenberg
Colonel, U.S. Army
Commanding

Enclosures

DEPARTMENT OF THE ARMY
US ARMY INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT BELVOIR
9820 FLAGLER ROAD, SUITE 213
FORT BELVOIR, VIRGINIA 22060-5928

OCT 29 2019

Directorate of Public Works

SUBJECT: Section 106 Consultation –Environmental Impact Statement (EIS) for the Davison Army Airfield (DAAF) Area Development Plan (ADP), Fort Belvoir, Virginia

Ms. Laura Arseneau
Fairfax County Dept. of Planning & Zoning
12055 Government Center Parkway
DPZ-PD, Suite 730
Fairfax, Virginia 22035

Dear Ms. Arseneau:

The US Army Garrison Fort Belvoir is preparing an EIS for the DAAF ADP. The EIS is being prepared in accordance with the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et. seq.) (NEPA), the Council on Environmental Quality NEPA regulations (40 CFR parts 1500–1508), and the Army's Corps of Engineers NEPA regulation (33 CFR part 230). Accordingly, the Army published a Notice of Intent to prepare the EIS for the Federal Register on April 19, 2018. In response, the State Historic Preservation Officer (SHPO) requested ongoing Section 106 consultation as the project continues to develop.

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Point of contact is Mr. Christopher W. Landgraf, Acting Director of Public Works, at 703-806-4194.

Sincerely,

Michael H. Greenberg
Colonel, U.S. Army
Commanding

Enclosures

Section 7 Consultation

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Virginia Field Office
6669 Short Lane
Gloucester, VA 23061

Date: 11/01/2019

Self-Certification Letter

Project Name: Davison Army Airfield Area Development Plan

Dear Applicant:

Thank you for using the U.S. Fish and Wildlife Service (Service) Virginia Ecological Services online project review process. By printing this letter in conjunction with your project review package, you are certifying that you have completed the online project review process for the project named above in accordance with all instructions provided, using the best available information to reach your conclusions. This letter, and the enclosed project review package, completes the review of your project in accordance with the Endangered Species Act of 1973 (16 U.S.C. 1531-1544, 87 Stat. 884), as amended (ESA). This letter also provides information for your project review under the National Environmental Policy Act of 1969 (P.L. 91-190, 42 U.S.C. 4321-4347, 83 Stat. 852), as amended. A copy of this letter and the project review package must be submitted to this office for this certification to be valid. This letter and the project review package will be maintained in our records.

The species conclusions table in the enclosed project review package summarizes your ESA conclusions. These conclusions resulted in:

- "no effect" determinations for proposed/listed species and/or proposed/designated critical habitat; and/or
- Action may affect the northern long-eared bat; however, any take that may occur as a result of the Action is not prohibited under the ESA Section 4(d) rule adopted for this species at 50 CFR § 17.40(o) [as determined through the Information, Planning, and Consultation System (IPaC) northern long-eared bat assisted determination key]; and/or
- "may affect, not likely to adversely affect" determinations for proposed/listed species and/or proposed/designated critical habitat.

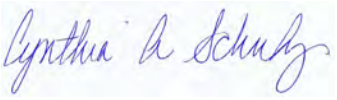
We certify that use of the online project review process in strict accordance with the instructions provided as documented in the enclosed project review package results in reaching the appropriate determinations. Therefore, we concur with the determinations described above for proposed and listed species and proposed and designated critical habitat. Additional coordination with this office is not needed.

Candidate species are not legally protected pursuant to the ESA. However, the Service encourages consideration of these species by avoiding adverse impacts to them. Please contact this office for additional coordination if your project action area contains candidate species.

Should project plans change or if additional information on the distribution of proposed or listed species, proposed or designated critical habitat becomes available, this determination may be reconsidered. This certification letter is valid for 1 year.

Information about the online project review process including instructions and use, species information, and other information regarding project reviews within Virginia is available at our website http://www.fws.gov/northeast/virginiafield/endspecies/project_reviews.html. If you have any questions, please contact Troy Andersen of this office at (804) 824-2428.

Sincerely,



Cindy Schulz
Field Supervisor
Virginia Ecological Services

Enclosures - project review package

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Virginia Ecological Services Field Office
6669 Short Lane
Gloucester, VA 23061-4410
Phone: (804) 693-6694 Fax: (804) 693-9032
http://www.fws.gov/northeast/virginiafield/

In Reply Refer To: November 01, 2019
Consultation Code: 05E2VA00-2020-SLI-0440
Event Code: 05E2VA00-2020-E-01354
Project Name: Davison Army Airfield Area Development Plan

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*). Any activity proposed on National Wildlife Refuge lands must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered

species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (http://www.fws.gov/windenergy/) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm; http://www.towerkill.com; and http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Virginia Ecological Services Field Office
6669 Short Lane
Gloucester, VA 23061-4410
(804) 693-6694

Project Summary

Consultation Code: 05E2VA00-2020-SLI-0440

Event Code: 05E2VA00-2020-E-01354

Project Name: Davison Army Airfield Area Development Plan

Project Type: DEVELOPMENT

Project Description: The U.S. Army proposes to implement an Area Development Plan (ADP) at Davison Army Airfield (DAAF), located at U.S. Army Garrison Fort Belvoir, Virginia (proposed action). The ADP will guide development at DAAF over the coming decades and will address the space and functional needs of the airfield tenants. The ADP proposes multiple new construction, replacement, demolition, and renovation projects at the airfield.

Project Location:

Approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/place/38.71482821157539N77.1809511481286W



Counties: Fairfax, VA

Endangered Species Act Species

There is a total of 1 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

Mammals

NAME	STATUS
Northern Long-eared Bat *Myotis septentrionalis* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9045	Threatened

Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

USFWS National Wildlife Refuge Lands And Fish Hatcheries

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

REFUGE INFORMATION WAS NOT AVAILABLE WHEN THIS SPECIES LIST WAS GENERATED. PLEASE CONTACT THE FIELD OFFICE FOR FURTHER INFORMATION.

Species Conclusions Table

Project Name: Davison Army Airfield Area Development Plan

Date: November 11, 2019

Species / Resource Name	Conclusion	ESA Section 7	Notes / Documentation
Northern Long-Eared Bat	Suitable habitat present, species not present	Not likely to adversely affect	Dkey

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Virginia Ecological Services Field Office
6669 Short Lane
Gloucester, VA 23061-4410
Phone: (804) 693-6694 Fax: (804) 693-9032
http://www.fws.gov/northeast/virginiafield/

In Reply Refer To: November 01, 2019
Consultation Code: 05E2VA00-2020-TA-0440
Event Code: 05E2VA00-2020-E-01378
Project Name: Davison Army Airfield Area Development Plan

Subject: Verification letter for the 'Davison Army Airfield Area Development Plan' project under the January 5, 2016, Programmatic Biological Opinion on Final 4(d) Rule for the Northern Long-eared Bat and Activities Excepted from Take Prohibitions.

Dear Natalie Kisak:

The U.S. Fish and Wildlife Service (Service) received on November 01, 2019 your effects determination for the 'Davison Army Airfield Area Development Plan' (the Action) using the northern long-eared bat (*Myotis septentrionalis*) key within the Information for Planning and Consultation (IPaC) system. This IPaC key assists users in determining whether a Federal action is consistent with the activities analyzed in the Service's January 5, 2016, Programmatic Biological Opinion (PBO). The PBO addresses activities excepted from "take"[1] prohibitions applicable to the northern long-eared bat under the Endangered Species Act of 1973 (ESA) (87 Stat.884, as amended; 16 U.S.C. 1531 et seq.).

Based upon your IPaC submission, the Action is consistent with activities analyzed in the PBO. The Action may affect the northern long-eared bat; however, any take that may occur as a result of the Action is not prohibited under the ESA Section 4(d) rule adopted for this species at 50 CFR §17.40(o). Unless the Service advises you within 30 days of the date of this letter that your IPaC-assisted determination was incorrect, this letter verifies that the PBO satisfies and concludes your responsibilities for this Action under ESA Section 7(a)(2) with respect to the northern long-eared bat.

Please report to our office any changes to the information about the Action that you submitted in IPaC, the results of any bat surveys conducted in the Action area, and any dead, injured, or sick northern long-eared bats that are found during Action implementation. If the Action is not completed within one year of the date of this letter, you must update and resubmit the information required in the IPaC key.

If the Action may affect other federally listed species besides the northern long-eared bat, a proposed species, and/or designated critical habitat, additional consultation between you and this Service office is required. If the Action may disturb bald or golden eagles, additional coordination with the Service under the Bald and Golden Eagle Protection Act is recommended.

---

[1]Take means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct [ESA Section 3(19)].

Action Description
You provided to IPaC the following name and description for the subject Action.

1. Name

Davison Army Airfield Area Development Plan

2. Description

The following description was provided for the project 'Davison Army Airfield Area Development Plan':

> The U.S. Army proposes to implement an Area Development Plan (ADP) at Davison Army Airfield (DAAF), located at U.S. Army Garrison Fort Belvoir, Virginia (proposed action). The ADP will guide development at DAAF over the coming decades and will address the space and functional needs of the airfield tenants. The ADP proposes multiple new construction, replacement, demolition, and renovation projects at the airfield.

Approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/place/38.71482821157539N77.1809511481286W



Determination Key Result

This Federal Action may affect the northern long-eared bat in a manner consistent with the description of activities addressed by the Service's PBO dated January 5, 2016. Any taking that may occur incidental to this Action is not prohibited under the final 4(d) rule at 50 CFR §17.40(o). Therefore, the PBO satisfies your responsibilities for this Action under ESA Section 7(a)(2) relative to the northern long-eared bat.

Determination Key Description: Northern Long-eared Bat 4(d) Rule

This key was last updated in IPaC on May 15, 2017. Keys are subject to periodic revision.

This key is intended for actions that may affect the threatened northern long-eared bat.

The purpose of the key for Federal actions is to assist determinations as to whether proposed actions are consistent with those analyzed in the Service's PBO dated January 5, 2016.

Federal actions that may cause prohibited take of northern long-eared bats, affect ESA-listed species other than the northern long-eared bat, or affect any designated critical habitat, require ESA Section 7(a)(2) consultation in addition to the use of this key. Federal actions that may affect species proposed for listing or critical habitat proposed for designation may require a conference under ESA Section 7(a)(4).

Determination Key Result

This project may affect the threatened Northern long-eared bat; therefore, consultation with the Service pursuant to Section 7(a)(2) of the Endangered Species Act of 1973 (87 Stat.884, as amended; 16 U.S.C. 1531 et seq.) is required. However, based on the information you provided, this project may rely on the Service's January 5, 2016, *Programmatic Biological Opinion on Final 4(d) Rule for the Northern Long-Eared Bat and Activities Excepted from Take Prohibitions* to fulfill its Section 7(a)(2) consultation obligation.

Qualification Interview

1. Is the action authorized, funded, or being carried out by a Federal agency?

   Yes

2. Have you determined that the proposed action will have "no effect" on the northern long-eared bat? (If you are unsure select "No")

   No

3. Will your activity purposefully **Take** northern long-eared bats?

   No

4. Is the project action area located wholly outside the White-nose Syndrome Zone?

   Automatically answered
   No

5. Have you contacted the appropriate agency to determine if your project is near a known hibernaculum or maternity roost tree?

   Location information for northern long-eared bat hibernacula is generally kept in state Natural Heritage Inventory databases – the availability of this data varies state-by-state. Many states provide online access to their data, either directly by providing maps or by providing the opportunity to make a data request. In some cases, to protect those resources, access to the information may be limited. A web page with links to state Natural Heritage Inventory databases is available at www.fws.gov/midwest/endangered/mammals/nleb/nhisites.html.

   Yes

6. Will the action affect a cave or mine where northern long-eared bats are known to hibernate (i.e., hibernaculum) or could it alter the entrance or the environment (physical or other alteration) of a hibernaculum?

   No

7. Will the action involve Tree Removal?

   Yes

8. Will the action only remove hazardous trees for the protection of human life or property?

   No

9. Will the action remove trees within 0.25 miles of a known northern long-eared bat hibernaculum at any time of year?

   No

10. Will the action remove a known occupied northern long-eared bat maternity roost tree or any trees within 150 feet of a known occupied maternity roost tree from June 1 through July 31?

    No

Project Questionnaire

If the project includes forest conversion, report the appropriate acreages below. Otherwise, type '0' in questions 1-3.

1. Estimated total acres of forest conversion:

6

2. If known, estimated acres of forest conversion from April 1 to October 31

0

3. If known, estimated acres of forest conversion from June 1 to July 31

0

If the project includes timber harvest, report the appropriate acreages below. Otherwise, type '0' in questions 4-6.

4. Estimated total acres of timber harvest

0

5. If known, estimated acres of timber harvest from April 1 to October 31

0

6. If known, estimated acres of timber harvest from June 1 to July 31

0

If the project includes prescribed fire, report the appropriate acreages below. Otherwise, type '0' in questions 7-9.

7. Estimated total acres of prescribed fire

0

8. If known, estimated acres of prescribed fire from April 1 to October 31

0

9. If known, estimated acres of prescribed fire from June 1 to July 31

0

If the project includes new wind turbines, report the megawatts of wind capacity below. Otherwise, type '0' in question 10.

10. What is the estimated wind capacity (in megawatts) of the new turbine(s)?
0

VDEQ Correspondence

RECEIVED
JAN 2 2019
B.

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY
NORTHERN REGIONAL OFFICE
13901 Crown Court, Woodbridge, Virginia 22193
(703) 583-3800
www.deq.virginia.gov

Matthew J. Strickler
Secretary of Natural Resources

David K. Paylor
Director

Thomas A. Faha
Regional Director

December 26, 2018

Lindsey G. France
Ft. Belvoir Dir of Public Works
Environmental Restoration Div
9430 Jackson Loop, Bldg 1442
Fort Belvoir, Virginia 22060-5116

RE: **PC#2014-3100; CASE CLOSED; Ft. Belvoir Davison Airfield Bldg 3233**
6970 Britten Drive, Fort Belvoir, Fairfax County 22060

Dear Lindsey France:

Following a review of the referenced file and based upon the information you have submitted regarding current site conditions, the Department of Environmental Quality (DEQ) has determined that petroleum contamination levels at this site do not represent an identified risk to human health and the environment. Therefore, this petroleum contamination case is closed and further corrective action related to this release is not required.

Please be advised, however, that should further environmental problems occur, which the DEQ determines are related to this release, the DEQ reserves the right pursuant to Virginia Law and Regulations to require additional investigation and/or corrective action.

Although no further corrective action is required related to this release, the following items may need to be addressed:

- Any groundwater monitoring wells installed as a result of this release must be properly closed in accordance with Section 5.8 and Appendix C of the DEQ Storage Tank Program Technical Manual.

- Any removed, closed-in-place, existing or new regulated underground storage tank (UST) must be registered with the DEQ. A UST Notification form (Form 7530-2) must be completed and sent to the DEQ at the above address. Completion of this form is not required if your tank(s) is currently registered and the registration is up-to-date. Certain types of tanks, such as tanks which contain heating oil that is used to heat the premises

where the tank is located and tanks with a capacity of 1100 gallons or less which contain motor fuel for noncommercial purposes, are not required to be registered.

- Any aboveground storage tank (AST) with a capacity greater than 660 gallons that contains petroleum may need to be registered with the DEQ. For more information, please contact the Petroleum Storage Tank Inspection Program at 703-583-3820 or by accessing the Virginia DEQ Web site @ www.deq.virginia.gov.

If you are eligible for and plan to seek reimbursement from the Virginia Petroleum Storage Tank Fund, you have **two years** from the date of this letter to apply for reimbursement. This includes reimbursement for costs to properly abandon monitoring wells.

If you have any questions or need additional information, please see attached closure memorandum or feel free to contact Kris McCandless at (703) 583-3833.

Sincerely,

Randy Chapman
Environmental Manager
Remediation

Enc: closure memo

cc: File(009590)

GCLO jre

DEPARTMENT OF ENVIRONMENTAL QUALITY
Northern Regional Office
Closure Memorandum

Re:	PC#2014-3100; Building 3233 at Davison Army Airfield, US Army Garrison Fort Belvoir, Fairfax County
To:	Randy Chapman, Environmental Manager, Remediation
From:	Kris McCandless, CPG, Environmental Geologist
Date:	December 19, 2018

On December 13, 2013, #2 fuel oil was observed during construction activities near a 5,000-gallon underground storage tank (UST) at Building 3233. The UST stores #2 oil for the boilers. The heating oil was removed by vacuum trucks and the trench drain plugged to prevent further migration of fuel oil into the sanitary sewer. The spill was reported to DEQ, Pollution Complaint (PC) case #2014-3100 was assigned, and a Site Characterization Report (SCR) was requested.

The UST was removed in February 2014 and 101 tons of oil-impacted soils and pea gravel were excavated from the tank pit. Soil samples from the excavation ranged from 7.5 to 100 mg/kg total petroleum hydro-carbons in the diesel range (TPH-DRO). Eleven soil borings were advanced in the vicinity of the tank with four converted to monitoring wells. Groundwater analysis from most of the wells was non-detect for dissolved-phase hydrocarbons (DPH). MW-2A (east-northeast of the former UST) and MW-1R (adjacent to the tank pit) contained dissolved phase petroleum but no free product. The reports concluded that the free product was removed during the initial site actions and subsequent tank and associated piping removals.



A review of the CEDS database indicated a prior PC case (#2000-3094) for Building 3233 opened in 1999 and closed in 2000. No release information is given and the documents had been destroyed in accordance with DEQ's file retention policies. The nearest historic PC to this release is for another heating oil tank adjacent (Building 3230) approximately 230 feet to the northwest. Pollution complaint case 2000-3093 was opened in 1999 and closed in 2000, similarly with all documentation destroyed.

The site lies adjacent to taxiways and runways of the Davison Army Airfield, on that portion of Army Garrison Fort Belvoir located north of US Route 1 and southwest of the Fairfax County

Parkway. Stormwater nearest the site is managed by concrete culverts and lined ditches, directing flow to the southeast and into Accotink Creek, more than half a mile to the southeast.

The SCR Addendum, dated August 28, 2018, prepared by AECOM indicates there has been no free product in the monitoring wells, there is no vapor intrusion risk because the separation distance has been satisfied (groundwater is between 6 and 10 feet below grade and the buildings nearby are all slab on grade), and TPH concentrations are decreasing. Based on these conclusions, they are recommending case closure and I concur.

Notice of Intent

PREVIOUSLY ANNOUNCED TIME AND DATE OF THE MEETING: 10:00 a.m., Friday, April 20, 2018.

CHANGES IN THE MEETING: The time of the meeting has changed. This meeting will now be held at 9:45 a.m. on Friday, April 20, 2018.

CONTACT PERSON FOR MORE INFORMATION: Christopher Kirkpatrick, 202–418–5964.

Natise L. Allen,

Executive Assistant.

[FR Doc. 2018–08287 Filed 4–17–18; 4:15 pm]

BILLING CODE 6351–01–P

DEPARTMENT OF DEFENSE

Department of the Air Force

Notice of Intent To Prepare a Supplemental Environmental Impact Statement for Tinian Divert Infrastructure Improvements, Commonwealth of the Mariana Islands

AGENCY: Department of the Air Force, Department of Defense.

ACTION: Notice of Intent.

SUMMARY: The United States Air Force (USAF) is issuing this notice to advise the public of the intent to prepare a Supplemental Environmental Impact Statement (SEIS) for the proposed Tinian Divert Infrastructure Improvements. The SEIS will assess the potential environmental consequences of the construction of a fuel pipeline and associated support facilities, and improvements to existing roadways, on the island of Tinian in the Commonwealth of the Northern Mariana Islands (CNMI).

DATES: USAF invites the public, stakeholders, and other interested parties to attend an open house public scoping meeting from 5 p.m. to 8 p.m. on Thursday, May 17, 2018 at the Tinian Elementary School cafeteria. A Chamorro/Carolinian interpreter will be available at the meeting and can assist with translation of meeting materials and written comments.

ADDRESSES: The project website *www.PACAFDivertMarianasEIS.com* provides more information on the SEIS and can be used to submit scoping comments. Scoping comments may also be submitted to Ms. Melissa Markell, (210) 925–2728, AFCEC/CZN; Attn: Tinian Divert SEIS; 2261 Hughes Ave, Suite 155; JBSA Lackland, TX 78236–9853, *melissa.markell@us.af.mil.* Comments will be accepted at any time during the environmental impact analysis process. However, to ensure the USAF has sufficient time to consider public input in the preparation of the Draft SEIS, scoping comments should be submitted in English to the website or the address listed above by May 27, 2018.

SUPPLEMENTARY INFORMATION: The USAF intends to prepare an SEIS to address changes made since the September 2016 completion of the Final EIS for Divert Activities and Exercises and the signature of the Record of Decision (ROD), signed December 7, 2016, announcing the USAF decision to select the Modified Tinian Alternative (Final EIS, Section 2.7, page 2–52) and specifically the North Option (Final EIS, Section 2.5.2, page 2–28), as a future Divert location.

After the ROD was signed in December 2016, the USAF conducted further evaluation of the fuel requirement and associated infrastructure, including the feasibility of different alternatives that were not considered in the original EIS. The USAF now proposes to construct a fuel pipeline to transport fuel from the seaport to the airport, and associated infrastructure at the seaport, rather than using fuel trucks for fuel transfer. In addition, recent reconnaissance surveys of the routes proposed for Divert-related vehicles, and coordination with Tinian leadership, indicate the existing surface road network is inadequate to support heavy vehicle traffic required for Divert activities, and is in need of improvements. Therefore, the USAF also proposes to improve certain existing roads between the seaport and airport that would be used to support Divert-related projects.

Scoping and Agency Coordination: To effectively define the full range of issues to be evaluated in the SEIS, the USAF will determine the scope of the analysis by soliciting comments from interested local, state and federal elected officials and agencies, as well as interested members of the public and others. A scoping meeting will be held on Tinian and the scheduled date, time, and location for the scoping meeting will also be published in local media a minimum of 15 days prior to the scoping meeting. The USAF also welcomes comments under Section 106 of the National Historic Preservation Act (36 Code of Federal Regulations 800) regarding the identification of or effects on historic properties.

If you have comments or would like to become a consulting party in the Section 106 process, please visit the project website or contact Ms. Melissa Markell, AFCEC/CZN at the address above.

Henry Williams,

Acting Air Force Federal Register Liaison Officer.

[FR Doc. 2018–08199 Filed 4–18–18; 8:45 am]

BILLING CODE 5001–05–P

DEPARTMENT OF DEFENSE

Department of the Army

Environmental Impact Statement for Area Development Plan, Davison Army Airfield, Fort Belvoir, VA

AGENCY: Department of the Army, DOD.

ACTION: Notice of intent.

SUMMARY: The Department of the Army (Army) announces its intent to conduct public scoping under the National Environmental Policy Act (NEPA) and solicit public comments to gather information to prepare an Environmental Impact Statement (EIS) for a proposed Area Development Plan (ADP) for Davison Army Airfield (DAAF), U.S. Army Garrison Fort Belvoir (Fort Belvoir), Virginia. The EIS will analyze the potential environmental impacts that would result from implementing the projects identified in the ADP (Proposed Action). The Proposed Action consists of multiple new construction, replacement, demolition, and renovation projects at DAAF. The Proposed Action does not include, nor would it require, substantial changes in missions, air operations, or the number of aircraft or personnel. The scoping process will help identify reasonable alternatives, potential environmental impacts, and key issues of concern to be analyzed in the EIS. The Army intends to comply with the requirements of Section 106 of the National Historic Preservation Act in parallel with this NEPA process, and invites federally recognized tribes and the State Historic Preservation Office to participate in the consultation process.

DATES: Comments must be sent by May 21, 2018.

ADDRESSES: Please send written comments to: U.S. Army Corps of Engineers, ATTN. Heather Cisar, Planning Division, 2 Hopkins Plaza, 10th Floor, Baltimore, MD 21201.

FOR FURTHER INFORMATION CONTACT: Heather Cisar at: *FortBelvoirNOI@usace.army.mil*

SUPPLEMENTARY INFORMATION: DAAF is located on Fort Belvoir's North Post in Fairfax County, VA. DAAF is home to The Army Aviation Brigade's (TAAB)

12th Aviation Battalion (AVN BN) and several other tenants, including the Night Vision and Electronic Sensor Directorate (NVESD); District of Columbia Army National Guard (DCARNG); Operational Support Airlift Activity/Operational Support Airlift Command (OSA–A/OSACOM); Civil Air Patrol; and TAAB's Airfield Division. DAAF's existing physical infrastructure consists of buildings and pavements. Buildings include several fixed- and rotary-wing aircraft (helicopter) maintenance hangars, operations/administrative facilities, an air control tower, and a fire station. A number of buildings are old and inefficient (dating from the 1950's to 1970's) and are too small. DAAF's buildings are also located in an inefficient way, resulting in spread-out operations; interaction of helicopters and fixed-wing aircraft that reduces operational safety; and the need for multiple runway crossings. Finally, a number of facilities are in violation of airfield design requirements and operate under temporary waivers.

Fort Belvoir has a current Real Property Master Plan (RPMP) for the Main Post and Fort Belvoir North Area. Within that plan, DAAF is a district requiring an ADP. Therefore, the Army is preparing an ADP to support and complement the RPMP and guide future development actions at DAAF.

The proposed ADP identifies multiple projects that will address the airfield's deficiencies and accommodate the space and functional needs of DAAF's tenants, consistent with applicable regulations and the airfield's vision to create a safe, secure, sustainable, consolidated aviation complex that allows for mission growth and provides multiple services in a compact campus. The ADP projects include the construction of a consolidated complex for the 12th AVN BN comprising one new aircraft maintenance hangar and two new aircraft storage hangars, along with supporting facilities (including wash rack and paint booth), associated aircraft parking aprons, and privately owned vehicle (POV) parking; consolidation of NVESD to new facilities; renovation and extension of the existing DCARNG facilities; construction of a new aircraft maintenance hangar and a new administrative facility for OSA–A/OSACOM; and renovation and extension of the Airfield Division's building. Up to 25 existing facilities would be demolished, including the buildings currently under temporary waivers. Infrastructure improvements would include construction of a 200-foot runway extension; realignment and extension of existing roadways; construction of an entry gate meeting applicable antiterrorism/force protection (AT/FP) standards; and excavation and grading of a wooded knoll to eliminate airfield clearance violations.

At a minimum, the EIS will analyze the potential impacts of three alternatives: No Action Alternative, Full Implementation Alternative, and Partial Implementation Alternative. Any other reasonable alternatives identified during the scoping process will be considered for evaluation in the EIS. The EIS will assess the impacts of the alternatives on resources and identify mitigation measures. The proposed action could result in significant adverse effects on the 100-year floodplain associated with Accotink Creek, which covers a substantial part of DAAF, and on wetlands. One of the proposed projects would require using part of Anderson Park, a Fort Belvoir recreational resource adjacent to DAAF, to construct a new POV parking lot.

Governmental agencies, federally recognized Indian tribes, interested organizations, and individuals are invited to participate in the scoping process for the preparation of this EIS by attending meetings and/or submitting written comments.

Written comments must be sent within 30 days of publication of this NOI in the **Federal Register**. A public scoping meeting will be held near Fort Belvoir during this period. Notification of the meeting's time and location will be published locally.

Brenda S. Bowen,

Army Federal Register Liaison Officer.

[FR Doc. 2018–08205 Filed 4–18–18; 8:45 am]

BILLING CODE 5001–03–P

DEPARTMENT OF DEFENSE

Office of the Secretary

[Transmittal No. 18–10]

Arms Sales Notification

AGENCY: Defense Security Cooperation Agency, Department of Defense.

ACTION: Arms sales notice.

SUMMARY: The Department of Defense is publishing the unclassified text of an arms sales notification.

FOR FURTHER INFORMATION CONTACT: Pamela Young, (703) 697–9107, *pamela.a.young14.civ@mail.mil* or Kathy Valadez, (703) 697–9217, *kathy.a.valadez.civ@mail.mil*; DSCA/DSA–RAN.

SUPPLEMENTARY INFORMATION: This 36(b)(1) arms sales notification is published to fulfill the requirements of section 155 of Public Law 104–164 dated July 21, 1996. The following is a copy of a letter to the Speaker of the House of Representatives, Transmittal 18–10 with attached Policy Justification.

Dated: April 16, 2018.

Shelly E. Finke,

Alternate OSD Federal Register Liaison Officer, Department of Defense.

BILLING CODE 5001–06–P

Scoping Letters and Mailing List

DEPARTMENT OF THE ARMY
US ARMY INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT BELVOIR
9820 FLAGLER ROAD, SUITE 213
FORT BELVOIR, VIRGINIA 22060-5928

APR 18 2018

Directorate of Public Works

Dear Sir or Madam:

The Department of the Army has announced its intent to prepare an Environmental Impact Statement (EIS) and conduct scoping in accordance with the National Environmental Policy Act to assess the potential impacts of implementing a proposed Area Development Plan (ADP) for Davison Army Airfield (DAAF), U.S. Army Garrison Fort Belvoir, Virginia. You are cordially invited to attend an interagency scoping meeting to hear about, and comment on, the proposed action and EIS. This meeting is for representatives of federal, state, regional, and local agencies who may have an interest in the proposed action and its alternatives. The meeting will be held on Wednesday, May 16 from 3:00 p.m. to 4:30 p.m. at the South County Center (Room 221), 8350 Richmond Highway (U.S. Route 1), Alexandria, Virginia 22309. A public open-house scoping meeting will be held at the same location from 6 p.m. to 9 p.m. on the same day. You are welcome to attend the public meeting in addition to, or instead of, the interagency meeting.

The proposed ADP is intended to guide development at DAAF over the next three decades. The ADP identifies multiple new construction, renovation, and demolition projects that remedy existing deficiencies in DAAF's infrastructure and adequately accommodate the space and functional needs of DAAF's tenants. The ADP does not include any substantial changes in missions, air operations, or aircraft or personnel loadings at DAAF.

It is anticipated the EIS will analyze three alternatives. Under the Full Implementation Alternative, all the projects identified in the ADP would be implemented. Under the Partial Implementation Alternative, only some of the projects in the ADP would be implemented. Under the No Action Alternative, the ADP would not be implemented and current conditions at DAAF would continue for the foreseeable future. Additional reasonable alternatives identified during the scoping process will be considered for evaluation in the EIS.

If you have any questions about the meeting, please contact Ms. Heather Cisar, U.S. Army Corps of Engineers, at 410-962-2911. In addition, written comments can be submitted by mail to: U.S. Army Corps of Engineers, Attn. Heather Cisar, Planning Division, 2 Hopkins Plaza, Baltimore, MD 21201; or by email to: FortBelvoirNOI@usace.army.mil. Comments must be sent no later than thirty (30) calendar days from receipt of this letter.

Sincerely,

Christopher L. Tomlinson
Lieutenant Colonel, U.S. Army
Commanding

"LEADERS IN EXCELLENCE"

DEPARTMENT OF THE ARMY
US ARMY INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT BELVOIR
9820 FLAGLER ROAD, SUITE 213
FORT BELVOIR, VIRGINIA 22060-5928

APR 16 2018

Directorate of Public Works

Dear Sir or Madam:

The Department of the Army is conducting public scoping to gather information to prepare an Environmental Impact Statement (EIS) in accordance with the National Environmental Policy Act. The EIS will assess the potential impacts on the environment as a result of implementing a proposed Area Development Plan (ADP) for Davison Army Airfield (DAAF), U.S. Army Garrison Fort Belvoir (Fort Belvoir), Virginia. You are cordially invited to attend a scoping meeting to learn about, and comment on, the proposed action and the EIS. The meeting will be held on:

Wednesday, May 16
South County Center (Room 221)
8350 Richmond Highway (U.S. Route 1)
Alexandria, Virginia 22309
6 p.m. to 9 p.m.

The meeting will be an open house and you can arrive at any time between 6:00 p.m. and 9:00 p.m. Army representatives will be available to discuss the proposed action and answer questions. During the meeting, you will be able to submit comments on the ADP and EIS process in writing, or by dictating them to a stenographer.

In compliance with the National Environmental Policy Act, the Army, federal, state, and local agencies, federally recognized tribes, individuals, and organizations that have an interest in the proposed action are urged to participate. If you require special assistance because of a disability or limited English proficiency, please call the Fort Belvoir Public Affairs Office at 703-805-5001. If you have questions about the meeting, please send an email to FortBelvoirNOI@usace.army.mil before May 11, 2018.

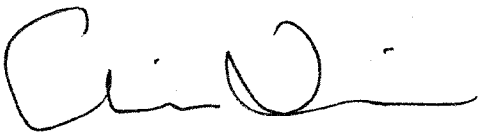
The proposed ADP is intended to guide development at DAAF over the next three decades. The ADP identifies multiple new construction, renovation, and demolition projects that remedy existing deficiencies in DAAF's infrastructure and adequately accommodate the space and functional needs of the airfield's tenants. The ADP does not include any substantial changes in missions, air operations, or aircraft or personnel loadings at DAAF.

It is anticipated that the EIS will analyze three alternatives. Under the Full Implementation Alternative, all the projects identified in the ADP would be implemented.

Under the Partial Implementation Alternative, only some of the projects in the ADP would be implemented. Under the No Action Alternative, the proposed ADP would not be implemented and current conditions at DAAF would continue for the foreseeable future. Additional reasonable alternatives identified during the scoping process will be considered for evaluation in the EIS.

Written comments can be submitted by mail to: U.S. Army Corps of Engineers, Attn. Heather Cisar, Planning Division, 2 Hopkins Plaza, Baltimore, MD 21201; or by email to: FortBelvoirNOI@usace.army.mil. Comments must be sent no later than thirty (30) calendar days from receipt of this letter.

Sincerely,



Christopher L. Tomlinson
Lieutenant Colonel, U.S. Army
Commanding

The Honorable Ralph Northam Governor of Virginia Office of the Governor P.O. Box 1475 Richmond, VA 23218	Chief Stephen R. Adkins Chickahominy Indian Tribe 8200 Lott Carry Road Providence Forge, VA 23140	Ms. Sharon Glasgow Senior Airport Planning Specialist FAA, Airport Planning & Env. Div. (APP-400) 800 Independence Avenue SW Washington, DC 20591
The Honorable Mark D. Sickles State Delegate, 43rd District of Virginia Virginia House of Delegates P.O. Box 10628 Franconia, VA 22310	Chief Gene Pathfollower Adkins Chickahominy Indian Tribe Eastern Division 2895 Mount Pleasant Road Providence Forge, VA 23140	Mr. Frank Smigelski Senior Environmental Specialist FAA, Airport Planning & Env. Div. (APP-400) 800 Independence Avenue SW Washington, DC 20591
The Honorable Scott A. Surovell State Senator, 36th District of Virginia Virginia Senate P.O. Box 289 Mount Vernon, VA 22121	Chief Frank Adams Upper Mattaponi Tribe P.O. Box 184 King Wiliam, VA 23086	Mr. Jeffrey Breeden Community Planner FAA, Washington Airports District Office 23723 Air Freight Lane, Suite 210 Dulles, VA 20166
The Honorable Sharon Bulova Chairman, At-Large Fairfax County Board of Supervisors 12000 Government Center Parkway, #530 Fairfax, VA 22035	Chief Anne Richardson Rappahannock Tribe 5036 Indian Neck Road Indian Neck, VA 23148	Amanda Ciampolillo, Regional Env. Officer FEMA, Env. Planning & Historic Preservation 615 Chestnut Street One Independence Mall, Sixth Floor Philadelphia, PA 19106-4404
Supervisor Dan Storck Mount Vernon District Fairfax County Board of Supervisors 2511 Parkers Lane Mount Vernon, VA 22306	Chief Dean Branham Monacan Indian Nation P.O. Box 1136 Madison Heights, VA 24572	Ms. Cindy Schulz, Supervisor U.S. Fish & Wildlife Service Virginia Field Office 6669 Short Lane Gloucester, VA 23061
Mr. Neil Patterson, Jr. Director Tuscarora Nation Environmental Program 5226 E. Walmore Road Lewiston, NY 14092	Chief Ronald Lee Lockamy Nansemond Indian Tribal Association 1001 Pembroke Lane Suffolk, VA 23434	Ms. Genevieve LaRouche, Supervisor U.S. Fish & Wildlife Service Chesapeake Bay Field Office 117 Admiral Cochrane Drive Annapolis, MD 21401-7307
Ms. Lisa LaRue-Baker, THPO United Keetoowah Band of Cherokee Indians in Oklahoma P.O. Box 746 Tahlequah, OK 74465	Mr. Rob Tomiak, Director U.S. EPA, Office of Federal Activities 1200 Pennsylvania Avenue NW Mail code: 2251A Washington, DC 20460	Mr. Marcel C. Acosta, Executive Director National Capital Planning Commission 401 9th Street NW, North Lobby #500 Washington, DC 20004
Ms. Caitlin Totherow Tribal Historic Preservation Officer Catawba Indian Nation 1536 Tom Steven Road Rock Hill, SC 29730	Ms. Barbara Rudnick, NEPA Team Leader U.S. EPA Region 3, Office of Environmental Programs (3EA30) 1650 Arch Street Philadelphia, PA 19103-2029	Ms. Diane Sullivan, Director Urban Design and Plan Review Division National Capital Planning Commission 401 9th Street NW, North Lobby #500 Washington, DC 20004
Mr. Russell Townsend, THPO Eastern Band of Cherokee Indians Qualla Boundary P.O. Box 455 Cherokee, NC 28719	Mr. John A. Bricker, State Conservationist USDA, Natural Resources Conservation Service 1606 Santa Rosa Rd, Suite 209 Richmond, VA 23229-5014	Mr. Lee Webb Historic Preservation Specialist National Capital Planning Commission 401 9th Street NW, North Lobby #500 Washington, DC 20004
Chief Robert Gray Pamunkey Indian Tribe 191 Lay Landing Road King William, VA 23086	Mr. Dave Morrow Deputy District Engineer USACE, Baltimore District 2 Hopkins Plaza Baltimore, MD 21201	Mr. Reid Nelson, Director Advisory Council on Historic Preservation Office of Federal Agency Programs 401 F Street NW, Suite 308 Washington, DC 20001-2637

Ms. Katry Harris, Program Analyst Advisory Council on Historic Preservation Office of Federal Agency Programs 401 F Street NW, Suite 308 Washington, DC 20001-2637	Mr. Peter F. Murphy, Jr. Chairman Fairfax County Planning Commission 12000 Government Center Parkway, #330 Fairfax, VA 22035	Ms. Linda Cornish Blank Historic Preservation Planner Fairfax Co. Dept. of Planning & Zoning 12055 Government Center Parkway, #730 Fairfax, VA 22035-5505
Ms. Helen Cuervo, District Engineer Virginia Department of Transportation Northern Virginia District 4975 Alliance Drive Fairfax, VA 22030	Mr. Fred R. Selden Director Fairfax County Dept. of Planning & Zoning 12055 Government Center Parkway Fairfax, VA 22035-5505	Mr. Kevin Munroe Huntley Meadows Park Fairfax County Parks Authority 3701 Lockheed Boulevard Alexandria, VA 22306
Ms. Kate Mattice, Executive Director Northern Virginia Transportation Commission 2300 Wilson Boulevard, Suite 620 Arlington, VA 22201	Ms. Marianne Gardner, Director Fairfax County Dept. of Planning & Zoning Planning Division 12055 Government Center Parkway, #730 Fairfax, VA 22035-5505	Mr. Chuck Bean, Executive Director Metropolitan Washington Council of Governments 777 North Capitol Street NE, #300 Washington, DC 20002
Ms. René Hypes Environmental Review Coordinator Virginia Dept. of Conservation & Recreation 600 East Main Street, 24th Floor Richmond, VA 23219	Ms. Mary Anne Welton Fairfax County Dept of Planning & Zoning Fairfax County Wetlands Board 12055 Government Center Parkway Fairfax, VA 22035-5505	Mr. Stephen Walz, Director Metropolitan Washington Council of Governments, Dept. of Env. Programs 777 North Capitol Street NE, #300 Washington, DC 20002
Mr. Ray Fernald, Manager Virginia Dept. of Game & Inland Fisheries Environmental Services Section P.O. Box 90778 Richmond, VA 23228	Mr. James Patterson, Chief Fairfax County DPWES Stormwater Planning Division 12000 Government Center Parkway, #449 Fairfax, VA 22035	Mr. Robert W. Lazaro Executive Director Northern Virginia Regional Commission 3040 Williams Drive, #200 Fairfax, VA 22031
Ms. Bettina Rayfield, Program Manager Virginia DEQ, Office of Env. Impact Review 629 East Main Street P.O. Box 1105 Richmond, VA 23219	Mr. Richard R. Bowers, Jr. Chief, Fairfax County Fire and Rescue Department 4100 Chain Bridge Road, 7th Floor Fairfax, VA 22030	Mr. Jim Corcoran President & CEO Northern Virginia Chamber of Commerce 7900 Westpark Drive, #A550 Tysons, VA 22102-3853
Ms. Laura McKay, Program Manager Virginia DEQ 629 East Main Street P.O. Box 1105 Richmond, VA 23219	Mr. Edwin C. Roessler, Jr. Chief of Police Fairfax County Police Department 4100 Chain Bridge Road Fairfax, VA 22030	Mr. Kanathur Srikanth, Director MWCOG Department of Transportation Planning 777 North Capitol Street NE, #300 Washington, DC 20002
Mr. Marc E. Holma Architectural Historian Virginia Dept. of Historic Resources 2801 Kensington Avenue Richmond, VA 23221	Mr. David Bowden, Director Fairfax County Park Authority Planning & Development Division 12055 Government Center Parkway, #406 Fairfax, VA 22035	Mr. Todd Hafner Planning and Development Director Northern Virginia Regional Park Authority 5400 Ox Road Fairfax Station, VA 22039
Mr. Bryan Hill Fairfax County Executive Government Center 12000 Government Center Pkwy, #551 Fairfax, VA 22035	Mr. Gerald L. Gordon, President & CEO Fairfax County Economic Development Authority 8300 Boone Boulevard, #450 Tysons Corner, VA 22182	Ms. Mary Rafferty, Executive Director Virginia Conservation Network 409 E. Main Street, #201 Richmond, VA 23219
Mr. Tom Biesiadny, Director Fairfax County Dept. of Transportation Centerpointe 1 Office Building 4050 Legato Road, #400 Fairfax, VA 22033-2867	Ms. Elizabeth Crowell, Branch Manager Fairfax County Cultural Resources Management & Protection Branch 2855 Annandale Road Fairfax, VA 22042	Ms. Martha Wingfield Board Member Virginia Conservation Network 409 E. Main Street, #201 Richmond, VA 23219

Mr. Bob Elwood President Potomac River Association, Inc. P.O. Box 76 Valley Lee, MD 20692	Ms. Cathy Ledec, Chairman Mount Vernon Council of Citizens' Associations P.O. Box 203 Mount Vernon, VA 22121-0203	Ms. Lori Arguelles Executive Director Alice Ferguson Foundation 2001 Bryan Point Road Accokeek, MD 20607
Mr. Dean Naujoks Potomac Riverkeepers 1100 15th Street NW, 11th Floor Washington, DC 20005	Mr. Carl Kikuchi President Audubon Society of Northern Virginia 11100 Wildlife Center Drive, #100 Reston, VA 20190	Ms. Cathy Ledec, President Friends of Huntley Meadows c/o Huntley Meadows Park 3701 Lockheed Blvd Alexandria, VA 22306
Mr. Alan Rowsome Executive Director The Northern Virginia Conservation Trust 4022-A Hummer Road Annandale, VA 22003	Mr. Hedrick Belin President Potomac Conservancy 8403 Colesville Road, #805 Silver Spring, MD 20910	Ms. Stephanie K. Meeks President & CEO National Trust for Historic Preservation 2600 Virginia Avenue NW, #1100 Washington, DC 20037
Mr. Walter C. Clarke, President Southeast Fairfax Development Corporation 6677 Richmond Highway, Second Floor Alexandria, VA 22306	Ms. Nissa Dean Virginia State Director Alliance for the Chesapeake Bay 612 Hull Street, Suite 101C Richmond, VA 23224	Ms. Laurie Ossman, Executive Director Woodlawn Plantation & Frank Lloyd Wright's Pope Leighey House 9000 Richmond Highway Alexandria, VA 22309
Mr. Tim Thompson, President Fairfax County Federation of Citizens Associations P.O. Box 3913 Merrifield, VA 22116-3913	Ms. Rebecca Leprell Virginia Executive Director Chesapeake Bay Foundation Capitol Place, 1108 E. Main Street, #1600 Richmond, VA 23219	Mr. Scott Stroh Director Gunston Hall Plantation 10709 Gunston Road Mason Neck, VA 22079
Mr. Ken Gaffey President Inlet Cove Board of Directors 7035 Regional Inlet Drive Fort Belvoir, VA 22060	Mr. Scott Stroh, Chairman Mount Vernon Lee Chamber of Commerce Chamber of Commerce Building 6821 Richmond Highway Alexandria, VA 22306	Mr. Paul Kohlenberger President Historical Society of Fairfax County P.O. Box 415 Fairfax, VA 22038
Mr. Joe DeCola Executive Director The Fairfax 9140 Belvoir Woods Pkwy Fort Belvoir, VA 22060	Mr. Dale Rumberger President South County Federation P.O. Box 442 Mason Neck, VA 22199-0442	Mr. Brian Collison Pastor Pillar Church of Woodlawn 9001 Richmond Highway Alexandria, VA 22309
Ms. Hillary Clawson President Mason Neck Citizens Association P.O. Box 505 Mason Neck, VA 22199	Mr. Chris Soule, Chairman Lee District Association of Civic Organizations P.O. Box 10413 Alexandria, VA 22310	Mr. Donald Binder Reverend Pohick Episcopal Church 9301 Richmond Highway Lorton, VA 22079
Ms. Patricia Soriano, Chapter Delegate Political Chair, Parks & Public Lands Sierra Club, Mount Vernon Group 5405 Barrister Place Alexandria, VA 22304	Mr. Kris Unger Primary Conservator Friends of Accotink Creek 127 Poplar Road Fredericksburg, VA 22406-5022	Mr. Ross M. Bradford Associate General Counsel National Trust for Historic Preservation 1785 Massachusetts Avenue NW Washington, DC 20036
Ms. Judy Riggin Director Alexandria Friends Meeting at Woodlawn 8990 Woodlawn Road Fort Belvoir, VA 22060	Mr. Philip Latasa Chronicler Friends of Accotink Creek 127 Poplar Road Fredericksburg, VA 22406-5022	Ms. Patricia Tyson 8641 Mount Vernon Highway Alexandria, VA 22309

Ms. Martha Catlin 8324 Mount Vernon Highway Alexandria, VA 22309		

Newspaper Advertisements

Environmental Impact Statement (EIS)
Davison Army Airfield Area Development Plan (ADP)
Department of the Army, U.S. Army Garrison, Fort Belvoir

Public Notice of Scoping Meeting

Wednesday, May 16, 2018
Fairfax County South County Office
8350 Richmond Highway
Alexandria, VA 22309
6:00 PM to 9:00 PM

You are invited to a public scoping meeting the Department of the Army (Army) is hosting in accordance with the National Environmental Policy Act (NEPA) to gather information to prepare an Environmental Impact Statement (EIS). The EIS will evaluate the potential environmental impacts that may result from the proposed implementation of an Area Development Plan (ADP) for Davison Army Airfield (DAAF), U.S. Army Garrison Fort Belvoir (Fort Belvoir), Virginia. In parallel with the NEPA review process, the Army will also assess the ADP implementation's potential effects on historic properties protected under Section 106 of the National Historic Preservation Act.

DAAF is located west of the Fairfax County Parkway, between U.S. Route 1 to the south and Telegraph Road to the north, on Fort Belvoir's North Post. The ADP consists of multiple new construction, replacement, demolition, and renovation projects at DAAF.

The meeting will be held in an open-house format and you may arrive at any time between 6 pm and 9 pm to learn about DAAF, the proposed action, and the EIS process. Army representatives will be available to discuss the ADP and answer questions. During the meeting, you will be able to submit comments on the proposed action and the EIS process in writing or by dictating them to a stenographer. If you need special assistance because of a disability or limited English proficiency, or if you have questions about the scoping meeting, please send an email to FortBelvoirNOI@usace.army.mil before May 11, 2018.

Before or after the meeting, written comments may be submitted by mail to: U.S. Army Corps of Engineers, ATTN: Heather Cisar, Planning Division, 2 Hopkins Plaza, 10th Floor, Baltimore, MD 21201; or by e-mail to: FortBelvoirNOI@usace.army.mil.

Comments must be sent or postmarked no later than May 21, 2018. Public participation is an important aspect of the NEPA and Section 106 processes and the Army strongly encourages you to attend the meeting and/or comment on the proposed action and the EIS.



PHOTOS CONTRIBUTED

Doris Leisner (left) and Maybelle Campbell, Spring Hills Mt. Vernon Assisted Living residents, planted flowers in pots in the Spring Hills garden in honor of Earth Day.

Seniors Observe Earth Day

The seniors at Spring Hills Mt. Vernon Assisted Living celebrated Earth Day one day early by planting hydrangea bushes and flowers in their garden. Everyone was given a straw hat with a brim to get them in a spirit as well as block the sun. After they were done planting and getting their hands dirty, they enjoyed lemonade and cactus-shaped cookies.

It's **nature and nurture** all summer long
at **Burgundy Farm Summer Day Camp!**

Open House this Saturday, 9–11 a.m.!



BURGUNDY FARM
Summer Day Camp

ACCREDITED

- Campers will enjoy **25+ acres** of beautiful, natural space, just off the Beltway in Alexandria. A pond, barnyard, woods and more await children!
- Camp runs **June 18 through August 10**. We have options for ages 3 years, 8 months through 12, with a counselor in training program for ages 13-16.
- Preview camp at our **Open House April 28, 9-11 a.m.!** Or learn more and register for camp: 703.842.0477 or **www.burgundysummer.org**

ENVIRONMENTAL IMPACT STATEMENT (EIS) DAVISON ARMY

Environmental Impact Statement (EIS)
Davison Army Airfield Area Development Plan (ADP)
Department of the Army, U.S. Army Garrison,
Fort Belvoir

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Comments must be sent or postmarked no later than May 21, 2018. Public participation is an important aspect of the NEPA and Section 106 processes and the Army strongly encourages you to attend the meeting and/or comment on the proposed action and the EIS.

Appeared in: Washington Post on Thursday, 04/19/2018

Home

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Scoping Meeting Posters and Fact Sheets

Welcome

Public Scoping Meeting
Environmental Impact Statement for Davison Army Airfield Area Development Plan

May 16, 2018 / 6–9 pm

Learn	**Ask**	**Offer**	**Identify**
about the project	questions	comments	Potential issues


View of DAAF, looking southwest


Building 3244, Flight Control Tower


Building 3331, A Company Hangar

Public Participation and Scoping

Public participation is an essential part of the EIS process

- Scoping is an early step in the EIS process
- Scoping comments help determine the issues that will be addressed in the EIS
- Please tell us of any thoughts or concerns you may have about the proposed ADP and how it may affect the environment



Next Opportunities for Public Participation

- The Draft EIS will be available for a 45-day review period
- The Final EIS will be available for a 30-day review period
- To be notified of the publication of the Draft EIS and Final EIS, please ask to be added to the mailing list

How to Comment

Tonight:

- Fill out a comment form and drop it in the comment box
- Speak to the on-site stenographer

During the entire scoping period:

- Submit comments by mail to:

U.S. Army Corps of Engineers
Attn. Heather Cisar, Planning Division
2 Hopkins Plaza
Baltimore, MD 21201

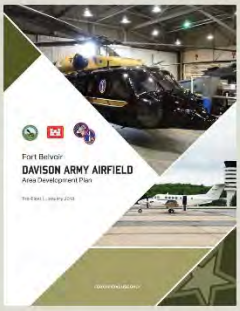
- Or e-mail: FortBelvoirNOI@usace.army.mil

All comments must be sent or postmarked no later than May 21, 2018 at 11:59 p.m.

Proposed Action

What is the Proposed Action?

The Proposed Action is to implement projects identified in the Davison Army Airfield (DAAF) Area Development Plan (ADP).



What is an ADP?

- An ADP identifies needed projects and locations for those projects
- ADPs are required by Department of Defense (DoD) regulations

Why is the Proposed Action Needed?

To create a safe, secure, sustainable, and consolidated aviation complex that allows for mission growth and provides multiple services in a compact campus by:

- Replacing outdated, undersized, and inefficient facilities
- Improving airfield layout
- Meeting airfield design requirements

Projects in the DAAF ADP would be implemented over approximately 30 years.

The Proposed Action does not include, nor would it require, substantial changes in missions, air operations, or the number of aircraft and personnel at DAAF.



Building 3232, C Company Hangar



Building 3136, Airfield Operations



View from DAAF Flight Control Tower, looking southwest

Davison Army Airfield (DAAF)



Aerial view of DAAF



Flight control tower overlooking DAAF

DAAF Tenants

DAAF Tenant Missions

- Immediate response to contingencies in the National Capital Region and premier air movement to our nation's leaders
- Operational, logistical, and training support for Army National Guard and Civil Air Patrol units
- Research and development of aircraft sensor technology
- General support for airfield operations and safety

DAAF tenants operate approximately 50 small planes and helicopters:

- VH-60 / UH-60 / EH-60 Black Hawk
- Cessna 172 / 182
- C-26 Metroliner
- UH-72 Lakota
- DHC-6 Twin Otter
- Beechcraft C-12 Huron
- UC-35 Citation



DHC-6 Twin Otter



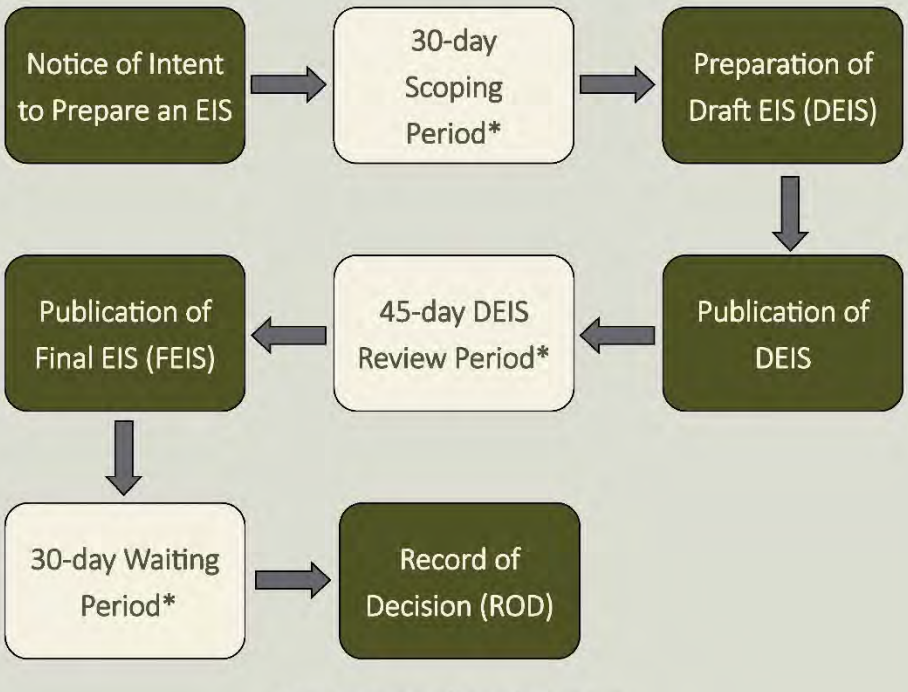
UH-60 Black Hawk



UH-72 Lakota

National Environmental Policy Act (NEPA) and Environmental Impact Statement (EIS) Process

- NEPA requires federal agencies to consider the impacts of their actions
- For major actions, an EIS must be prepared
- An EIS describes the proposed action, alternatives, and impacts
- Public participation is an essential part of NEPA



*Opportunity for Public Input

Typically, an EIS considers impacts on:

- Land use
- Socioeconomics
- Utilities
- Transportation
- Hazardous materials
- Cultural resources
- Geology, soils, and topography
- Air quality
- Noise
- Water quality
- Wetlands and floodplains
- Vegetation and wildlife

Scoping helps determine the range of impacts considered in the EIS. Please let us know what potential impacts are important to YOU.

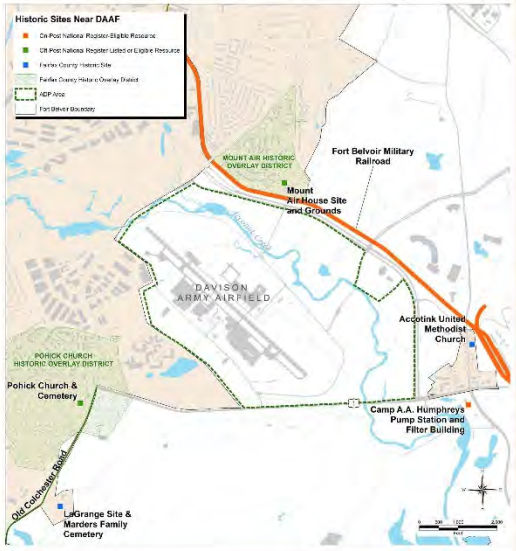
National Historic Preservation Act

Section 106 of the National Historic Preservation Act

- Requires federal agencies to consider potential effects on historic properties
- Applies to historic properties listed in or eligible for the National Register of Historic Places
- Provides opportunities for public involvement and comment

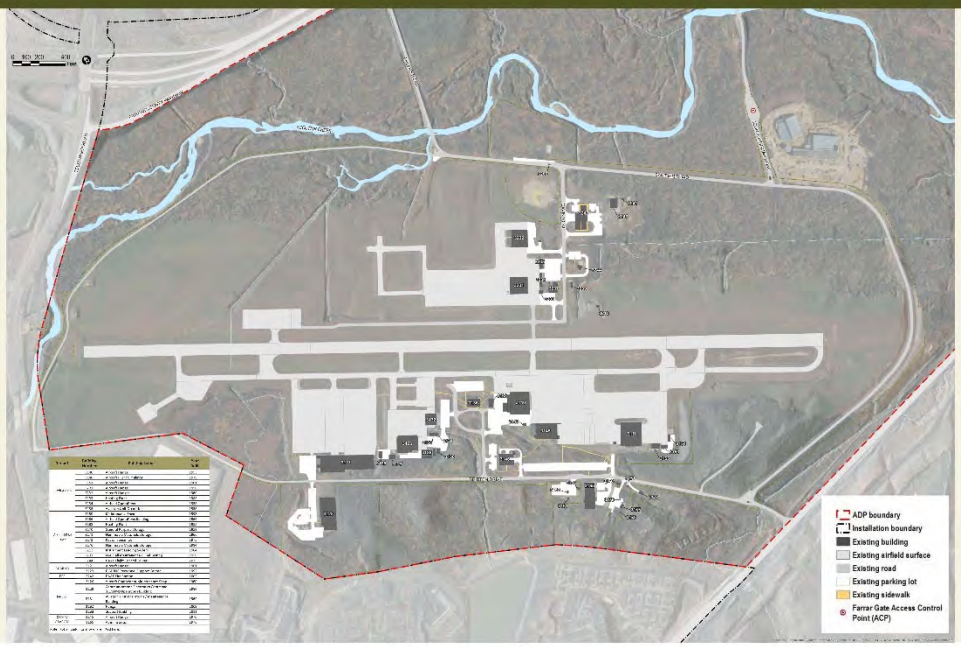
Are there historic properties on or near DAAF?

- No DAAF properties have been listed or determined eligible for listing in the National Register.
- Multiple properties listed or determined eligible for listing in the National Register are located near DAAF.

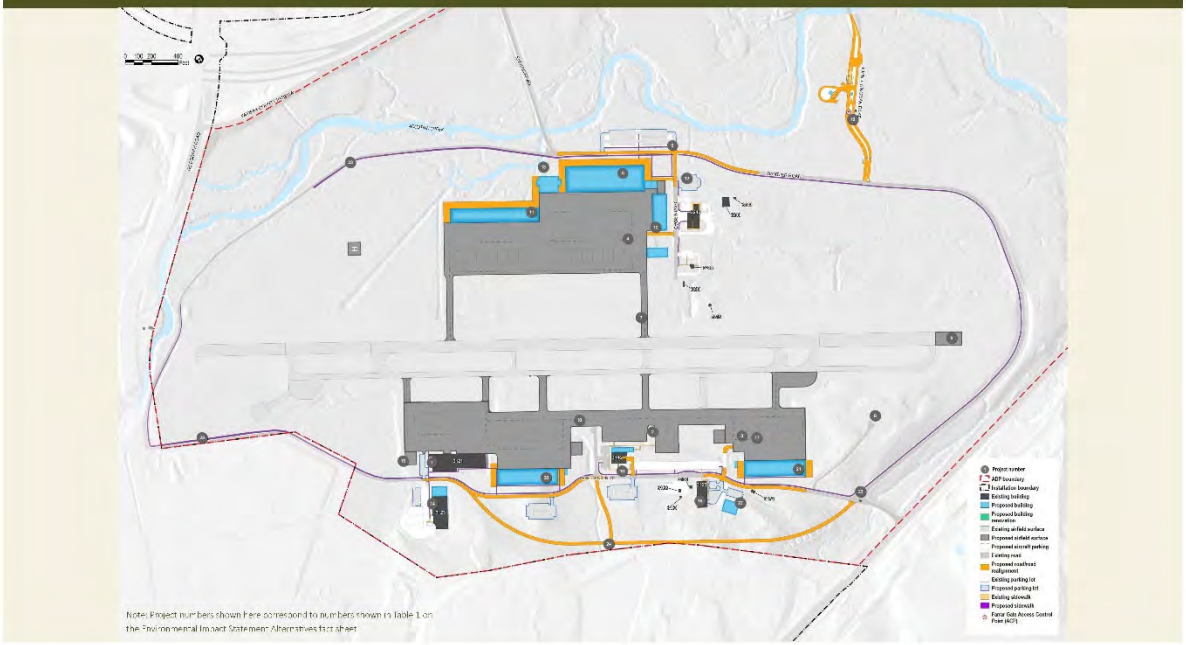


Do you know of any historic properties that could be affected by the Proposed Action?

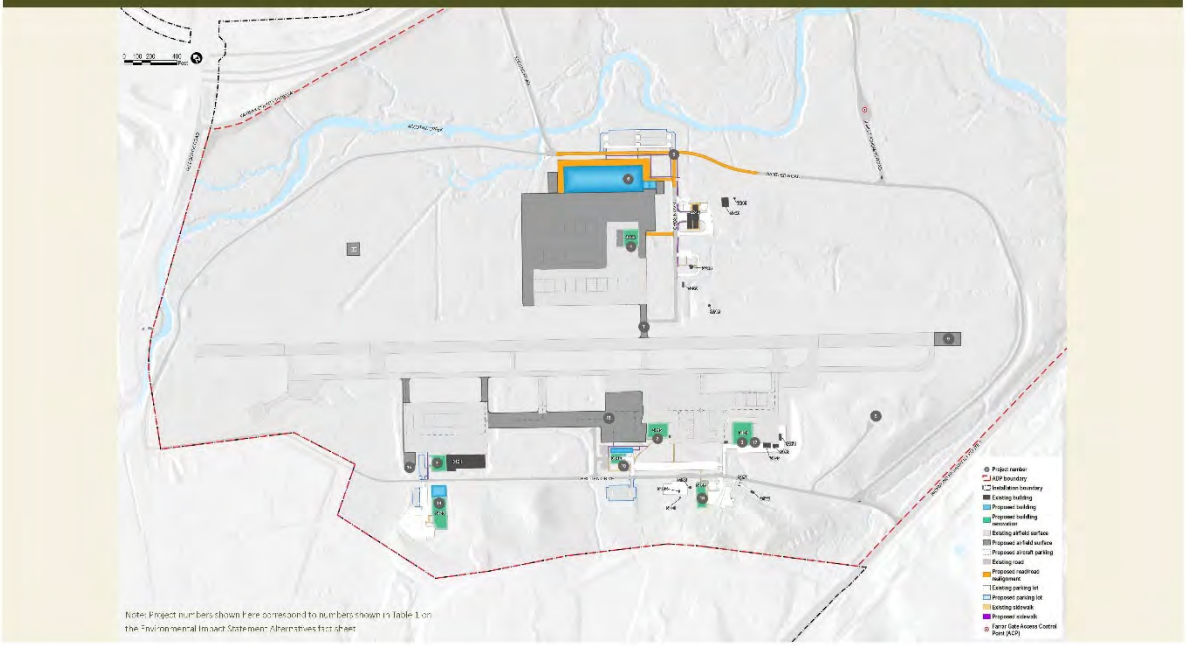
No Action Alternative



Full Implementation Alternative



Partial Implementation Alternative



Welcome



Helicopter static display at DAAF

What is the purpose of this meeting?

The U.S. Army is hosting this meeting to present information and request your comments about the proposed implementation of several projects at Davison Army Airfield (DAAF). DAAF is part of Fort Belvoir. To comply with the National Environmental Policy Act of 1969 (NEPA), the Army is preparing an Environmental Impact Statement (EIS) to analyze the potential impacts of this proposed action.

Public Participation and Scoping

Scoping is an early step of the EIS process. Public input during scoping is important. No decision about the proposed action has been made and the impact analysis has not yet started. Scoping will help the Army determine the range of potential impacts to be analyzed in the EIS.

What does the Army's proposed action include?

Under the proposed action, the Army would implement the facility and infrastructure improvement projects identified in DAAF's recently-updated Area Development Plan (ADP). Those projects are intended to better support the ongoing and future mission requirements of DAAF's tenants. The ADP projects would be implemented over the next 30 years. Additional information about the DAAF ADP and the proposed projects is available at this meeting.

What will tonight's meeting cover?

- The Army's proposed action to implement the projects in the DAAF ADP
- The NEPA and EIS process
- How to comment on the proposed action and its potential impacts

By commenting on the proposed action, you are helping the Army prepare a better EIS.

What is NEPA?

NEPA is the national charter for responsible management of the environment. Under NEPA, all federal agencies must analyze the potential environmental impacts of major proposed actions. NEPA also requires federal agencies to provide the public with opportunities to comment on proposed actions. More information about the NEPA process is available at tonight's meeting.

Is this meeting my only chance to comment?

Tonight's meeting is part of a 30-day scoping period that started on April 19, 2018 and will continue through May 21, 2018 at 11:59 p.m. You can provide comments during this entire period.

How to comment

Tonight:

- By filling out a comment form and dropping it in the comment box.
- By speaking to the on-site stenographer, who will write down your comment word for word.

During the entire scoping period:

By mail to:

U.S. Army Corps of Engineers
Attn. Heather Cisar, Planning Division
2 Hopkins Plaza
Baltimore, MD 21201

By email at: FortBelvoirNOI@usace.army.mil

All comments must be sent no later than May 21, 2018 at 11:59 p.m.

The public will have a second opportunity to comment when the Draft EIS (DEIS) is published. The DEIS will be available for review and comment for 45 days after publication.

Will I get a response to my comment?

Individual responses to scoping comments will not be provided. However, the Army will review all comments received during the 30-day scoping period and use them to define the range of issues (the "scope") that will be analyzed in the EIS.

Comments received on the DEIS will be addressed in the Final EIS (FEIS). The FEIS will be available for public review for 30 days.

Proposed Action

What is being proposed?

The Army's proposed action is to implement projects in the Davison Army Airfield (DAAF) Area Development Plan (ADP). DAAF is located on Fort Belvoir's North Post and is operated by U.S. Army Military District Washington (MDW). The ADP consists of multiple projects to improve facilities and infrastructure at DAAF. These projects are intended to better support the ongoing and future missions of DAAF's tenants and would be implemented over the next 30 years.

What is an ADP?



An ADP provides site planning direction for a specific area of a military installation. Department of Defense (DoD) regulations require all U.S. military installations to prepare ADPs for districts within their boundaries that are identifiable and connected based on distinctive features, such as land use or geographical characteristics. DAAF is identified as such a district in the Fort Belvoir Real Property Master Plan (RPMP), which was last updated in 2016.

Environmental impacts that would potentially result from implementing projects in the ADP will be assessed in the Environmental Impact Statement (EIS) that the Army is preparing in accordance with the National Environmental Policy Act of 1969 (NEPA).

Why is the proposed action needed?

- Many facilities at DAAF were built in the 1950s, 1960s, and 1970s and are now outdated and undersized for current operational requirements.
- The layout of DAAF's buildings is inefficient, resulting in spread-out operations, conflicting movements of helicopters and planes, and the need for multiple runway crossings.
- Several DAAF facilities are located within the Primary and Transitional safety surfaces associated with the airfield's runway. These surfaces are intended to ensure the safety of pilots and aircraft, and should not contain any structures. Temporary waivers are required for the continued operation of facilities within the safety surfaces. It is essential to DAAF's successful continued operation that these facilities within the safety surfaces be removed and the need for waivers eliminated.

The purpose of the proposed action is to provide DAAF with physical infrastructure that fulfills the vision of creating "*a safe, secure, sustainable, consolidated aviation complex that allows for mission growth and provides multiple services in a compact campus*."

What kinds of projects are in the proposed action?

- Construction of several new buildings, primarily aircraft hangars and aircraft maintenance facilities
- Renovation and/or expansion of selected hangars, maintenance facilities, and office/administrative buildings
- Demolition of several older buildings (following the relocation of their occupants)
- Infrastructure improvement projects, such as the realignment of the airfield perimeter road, construction of a new main entry gate, and expansion of aircraft parking aprons

The proposed action does not include, nor would it require, substantial changes in missions, air operations, or the number of aircraft and personnel at DAAF.

Where would the proposed action occur?

All of the projects in the proposed action would occur within the current boundaries of DAAF and Fort Belvoir; the acquisition of additional land is NOT proposed.

Most of the projects would occur in previously developed areas of DAAF; however, some projects would require clearing areas that are currently wooded or otherwise vegetated.

The proposed action is anticipated to have effects on the 100-year floodplain associated with Accotink Creek, which covers a substantial part of DAAF, and on wetlands. One of the proposed projects would require using part of Anderson Park, a Fort Belvoir recreational resource adjacent to DAAF, to construct a new parking lot.

Davison Army Airfield (DAAF)

Davison Army Airfield (DAAF) is part of Fort Belvoir's North Post and covers approximately 455 acres. It is located west of Fairfax County Parkway, between U.S. Route 1 to the south and Telegraph Road to the north.

Under the command of U.S. Army Military District Washington (MDW), DAAF has been in continuous use since it was built in the 1950s and currently hosts five tenants:

The Army Aviation Brigade Headquarters (TAAB): TAAB provides fixed and rotary wing aviation and engineer technical rescue capability; aviation, airfield and air traffic control mission command; and multi-component world-wide executive and non-executive airlift support to Headquarters Department of the Army and Joint Force Headquarters – National Capital Region/US Army Military District of Washington (JFHQ-NCR/USAMDW) to support JFHQ-NCR's Homeland Defense and Defense Support of Civil Authorities Contingency Plans in order to defend and secure the NCR.

TAAB Subordinate Units

Airfield Division: The Airfield Division conducts continuous airfield operations in support of DAAF users to provide a safe, controlled, and efficient airfield environment.

12th Aviation Battalion (12th AV BN): The 12th AV BN provides aerial mission command support, limited air assault, air movement and technical rescue for Headquarters Department of the Army (HQDA) and Joint Force Headquarters - National Capitol Region/MDW.

Operational Support Airlift Activity (OSA-A / OSACOM): OSA-A / OSACOM oversees management and execution of the total Army Non-Executive Operational Support Airlift (OSA) program.

Night Vision and Electronic Sensor Directorate (NVESD): NVESD supports the Warfighter in the field; develops electronic sensor systems for Unmanned Aircraft Systems (UAS), rotary, and fixed wing aircraft; transitions mature technologies to various Program Executive Offices (PEOs) and other Army organizations; and provides technical support to equipment acquisition and user communities.



Building 3232, C Company Hangar


DAAF viewed from Flight Control Tower

District of Columbia Army National Guard (DCARNG): The DCARNG provides aviation training and maintenance support for assigned aviation units; contingency Medical Evacuation (MEDEVAC) support for first responders; counterdrug surveillance; Very Important Person (VIP) transport; Reserve Officers' Training Corps (ROTC) airlift for Howard, George Mason, and Georgetown universities; patient transfer for Fort Belvoir Community Hospital; and DCARNG F-16 combat survival training.

Civil Air Patrol (CAP): CAP is the civilian auxiliary unit of the United States Air Force and fulfills three congressionally assigned missions: emergency services (search and rescue) and disaster relief operations; aerospace education for youth and the general public; and cadet programs for teenage youth.

Fire and Emergency Services (FES): FES is the first responder to fires, public safety, and medical emergencies at DAAF and ensures the safety and welfare of personnel through preservation of life, health, property, and the environment.

DAAF's tenants use and occupy buildings that include several aircraft maintenance hangars; operations / administrative facilities; a flight control tower; and a fire station. Many buildings at DAAF were built in the 1950s, 1960s, and 1970s.

DAAF has one runway as well as adjacent taxiways, aircraft parking aprons, and a helipad. An average of 150 aircraft take off and land daily in fulfillment of the airfield's mission of transporting passengers and freight for the Army and DoD to, from, and within the National Capital Region; and for training and testing operations.

Approximately 50 aircraft are permanently stationed at DAAF. These aircraft consist of helicopters and small planes, including:

- VH-60 / UH-60 / EH-60 Black Hawk
- Cessna 172/182
- C-26 Metroliner
- UH-72 Lakota
- DHC-6 Twin Otter
- Beechcraft C-12 Huron
- UC-35 Citation

In addition to its buildings, runway, and other facilities, DAAF has extensive vegetated and undeveloped areas including Accotink Creek, which flows to the east of and approximately parallel to the airfield's runway, wetlands, and wooded areas.

National Environmental Policy Act (NEPA)

In 1969, Congress passed the National Environmental Policy Act (NEPA), the national charter for responsible management of the environment. Under NEPA, all branches of the federal government must consider the potential environmental impacts of their major proposed actions.

The process for considering the impacts of a major federal proposed action is through the preparation of an environmental impact statement (EIS). An EIS is a document that analyzes and describes the positive and negative environmental effects of a proposed action and considers reasonable alternatives to the proposed action. Preparation of an EIS also provides an opportunity for the public to learn about and comment on federal actions that may affect their communities.

The findings of the EIS are taken into account by the proposing federal agency when making a decision on which alternative to implement.

How is an EIS prepared?

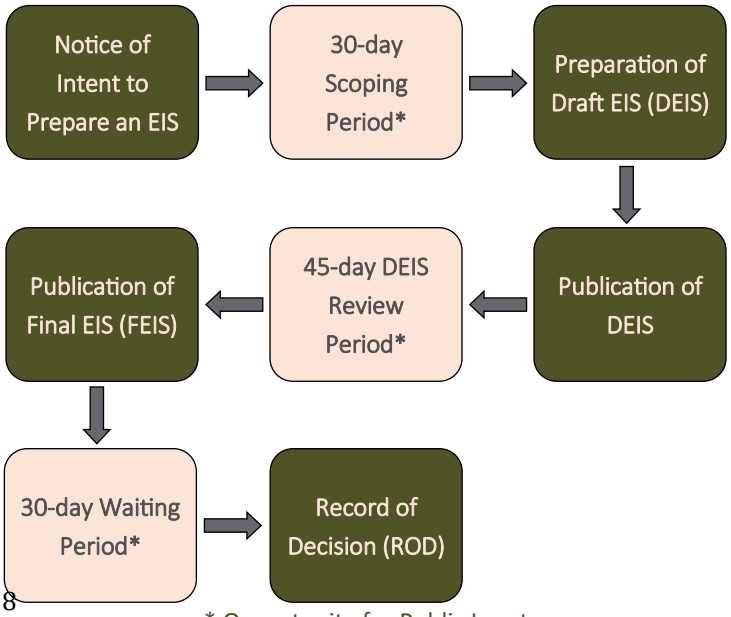
A typical EIS involves the following steps:

- **Publication of a Notice of Intent (NOI) to prepare an EIS:** this is the formal beginning of the EIS process. The NOI provides a general description of the proposed action and alternatives. By law, the NOI is published in the *Federal Register*. A shorter version of the NOI may also be published in local newspapers.
- **Scoping:** the NOI kicks off a "scoping period" during which government agencies and the public can review the proposed action and provide comments. These comments help determine the range of issues (the "scope") that will be considered in the EIS. The scoping period generally lasts for 30 days and often includes a public scoping meeting.
- **Preparation of the Draft EIS (DEIS):** after scoping is finished, a DEIS is prepared by an interdisciplinary team of environmental professionals. The DEIS describes the proposed action, the alternatives being considered, and the potential impacts on the environment, both natural (water, vegetation, wildlife, etc.) and human-made (land use, traffic, community resources, etc.).
- **Review of the DEIS:** once complete, the DEIS is made available for review and comment by government agencies and the public. The DEIS review period lasts for at least 45 days.
- **Preparation of the Final EIS (FEIS):** after the 45-day DEIS review period, comments on the DEIS are analyzed and an FEIS is prepared. The FEIS incorporates and responds to comments received on the DEIS.
- **Publication of the FEIS:** the FEIS is made available to the public for a 30-day waiting period during which additional comments may be submitted.
- **Record of Decision (ROD):** after the 30-day FEIS waiting period, a ROD can be issued by the proposing agency. The proposing agency issues a ROD to announce and explain its decision after having considered the findings of the EIS and the comments received. The proposed action analyzed in the EIS may not begin until the proposing agency has completed the EIS process and issued the ROD.

What is the EIS process for the DAAF ADP ?

The preparation of the DAAF ADP EIS will follow the typical process described above and illustrated below. Opportunities for your participation throughout the process are indicated with a *. Today's meeting is part of the scoping phase of the EIS. We encourage you to find out more about the project, ask questions, and most importantly, let us know of any concerns or issues you would like to see addressed in the EIS. Please see the "Public Participation and Scoping" station and the "Welcome" fact sheet for information on how to provide us with your comments.

DAAF ADP EIS Process



* Opportunity for Public Input

National Historic Preservation Act

Section 106 of the National Historic Preservation Act requires federal agencies to consider the effects of their actions on historic properties listed or eligible for listing in the National Register of Historic Places (National Register).

The Army's proposed action to implement Davison Army Airfield (DAAF) Area Development Plan (ADP) projects requires review under Section 106.

What is the National Register of Historic Places?

The National Register is the official list of the nation's historic places worthy of preservation. Buildings, structures, objects, archaeological sites, landscapes, and districts can be listed in the National Register.

To be eligible for listing, a property must meet certain criteria with respect to age, state of preservation, and significance. In general, it must be at least 50 years old and must appear much the way it did in the past. It also must be associated with events, activities, persons, or developments that were important in the history of the United States.

How do federal agencies consider potential effects on historic properties?

Federal agencies review the potential impacts of a proposed action on historic properties in consultation with the State Historic Preservation Officer (SHPO). In Virginia, this is one of the roles of the Virginia Department of Historic Resources (VDHR). In addition to the SHPO, other agencies, organizations, and individuals, known as "consulting parties," may be invited to participate, if they have a demonstrated interest in the potential effects of the undertaking on historic properties. Such consulting parties may include local historic preservation groups or owners of historic properties. Federally recognized Native American tribes must be invited to participate as well.

What is the role of the public in the Section 106 process?

The public must be provided opportunities to review and provide input during the process, especially with regard to properties that may have historic significance for the community and may need to be evaluated for eligibility. Public input should also be sought when assessing potential effects.

What is the relationship between Section 106 and the National Environmental Policy Act (NEPA)?

Reviews of proposed federal actions under Section 106 and NEPA are different processes. However, proposed federal actions that are subject to NEPA are generally also subject to Section 106. These processes can be conducted in parallel to achieve greater efficiency. This is the case for the DAAF ADP Environmental Impact Statement (EIS). Thus, public participation opportunities for the NEPA process – such as this meeting – also serve as public participation opportunities for the Section 106 process.

Are there historic properties at or near DAAF?

Fort Belvoir has conducted extensive historic resource surveys within its boundaries since the 1920s. DAAF was surveyed in 2009 and the Army determined that it contains no National Register-eligible resources. Properties that have been listed or determined eligible for listing in the National Register are located elsewhere on Fort Belvoir. The on-post National Register-eligible property closest to DAAF is the Camp A.A. Humphreys Pump Station and Filter Building, briefly described in Table 1.

Several other historic sites are located near DAAF. These sites are briefly described in Table 1. Their locations are shown on the National Historic Preservation Act display board.

Do you know of properties near DAAF that may have historic significance and might be affected by the proposed action? Please tell us.

Table 1 – Historic Sites Near DAAF

Historic Site	Listing(s)	Significance
Accotink United Methodist Church	Fairfax County Historic Site	Accotink United Methodist Church was built in 1880 and served as one of the institutional and cultural centers for Euro-American residents in the Village of Accotink.
Camp A.A. Humphreys Pump Station and Filter Building	National Register-Eligible Virginia Landmarks Register	The Pump Station and Filter Building was originally built in 1918 and is one of the few remaining vestiges of Camp A.A. Humphreys. The facility was expanded in 1936. The complex is historically significant as an example of World War I-era support facilities and for technological advances in the purification of drinking water. The complex ceased operation in 1970 and was renovated in 1986 for use as the Eleanor U. Kennedy Homeless Shelter.
Fort Belvoir Military Railroad	National Register-Eligible	Construction of the railroad began in 1918 as two separate spur tracks to connect Camp A.A. Humphreys with existing steam and electric rail lines and provide access to and from Washington, DC. The railroad was upgraded with the latest technology as part of a major World War II-era construction campaign at Fort Belvoir.
LaGrange Site & Marders Family Cemetery	Fairfax County Historic Site	This 28-acre site and cemetery was owned by Robert Boggess and his descendants until 1996. The house (now demolished) was built in 1867 on the site of a former residence and inn erected between 1740 and 1744.
Mount Air House Site and Grounds	Fairfax County Mount Air Historic District Overlay National Register-eligible archaeological site	The manor property dates to the 18th century and occupies a hilltop overlooking Accotink Creek. Several houses were built on the property throughout the 18th and 19th centuries. The circa-1830 house was destroyed by fire in 1992, but outbuildings, landscaped grounds, and burial grounds still remain. A National Register-eligible archaeological site is located on the grounds. The associated overlay district was established by Fairfax County in 1984 to protect and maintain the property's historic visual character (viewshed).
Old Colchester Road	National Register-Eligible	Old Colchester Road originally led to the seaport of Colchester, Virginia, on the banks of the Occoquan River near the Potomac River. Alexandria, Virginia ultimately took its place as the major seaport in the area and Old Colchester Road was incorporated into State Route 611.
Pohick Church & Cemetery	National Register-Listed Virginia Landmarks Register Fairfax County Pohick Church Historic Overlay District	Pohick Church is a brick, Palladian-style church built between 1762 and 1772. George Washington and George Mason attended services there. The associated overlay district was established in 1970 to protect and maintain the church's viewshed.



Pohick Church & Cemetery



Fort Belvoir Military Railroad



Camp A.A. Humphreys Pump Station and Filter Building

Environmental Impact Statement Alternatives

The National Environmental Policy Act (NEPA) requires federal agencies to analyze reasonable alternatives to their proposed actions. Consistent with this requirement, the Environmental Impact Statement (EIS) for the Davison Army Airfield (DAAF) Area Development Plan (ADP) will analyze the following three alternatives:

- **Full Implementation Alternative.** All projects in the DAAF ADP would be implemented.
- **Partial Implementation Alternative.** Under this alternative, a modified, reduced program of ADP projects would be implemented.
- **No Action Alternative.** None of the proposed ADP projects would be implemented. Current conditions at DAAF would continue for the foreseeable future.

NEPA requires analysis of the No Action Alternative in an EIS to provide a baseline against which the impacts of a proposed action can be compared.

Table 1 shows the individual ADP projects that are included in the Full ADP Implementation and Partial ADP Implementation Alternatives.

Table 1—DAAF ADP Projects

Project No.*	Project	Full Impl. Alternative	Partial Impl. Alternative
Short-range Projects			
1	Renovate Bldg. 3121, DCARNG Airfield Operations Section	●	●
2	Renovate Bldg. 3145, OSA-A/ OSACOM Hangar	●	●
3	Renovate Bldg. 3151, 12th AV BN D Company Hangar	●	●
4	Renovate Bldg. 3232, 12th AV BN C Company Hangar	●	●
5	Realign Santjer Road and Gavin Road	●	●
6	Construct 12th AV BN 8-Bay Aircraft Maintenance Hangar	●	●
7	Construct North Taxiway Connection	●	●
8	Remove Earthen Knoll	●	●
9	Construct Runway Safety Overrun	●	●
Mid-range Projects			
10	Renovate and Expand Bldg. 3146	●	●
11	Construct 12th AV BN 10-Bay Storage Hangar	●	
12	Construct 12th AV BN 4-Bay Storage Hangar and Secondary Parking Lot	●	

All of the proposed projects would occur within the current boundaries of DAAF; acquisition of additional land is NOT proposed.

Project No.*	Project	Full Impl. Alternative	Partial Impl. Alternative
12	Construct 12th AV BN 4-Bay Storage Hangar and Secondary Parking Lot	●	
13	Construct 12th AV BN Aircraft Paint Shop	●	
14	Repair and Expand Bldg. 3123, DCARNG Readiness Center	●	●
15	Construct DCARNG Aircraft Wash Rack	●	●
16	Renovate Bldg. 3165, OSA-A/ OSACOM Operations Facility	●	●
17	Relocate NVESD	●	●
18	Expand Aircraft Parking Apron	●	●
Long-range Projects			
19	Replace Farrar Gate Access Control Point and Install Redundant Communications Line	●	
20	Construct NVESD Hangar	●	
21	Construct OSA-A/OSACOM Operational Flight Division Hangar	●	
22	Construct OSA-A/OSACOM Operations Facility	●	
23	Construct Perimeter Road Multipurpose Trail	●	
24	Construct Alternative Perimeter Road	●	

*Numbers correspond to numbers on the Full Implementation Alternative and Partial Implementation Alternative display boards.

12th AV BN = 12th Aviation Battalion
ACP = access control point
Bldg. = building
DCARNG = District of Columbia Army National Guard
Impl. = implementation
NVESD = Night Vision and Electronic Sensors Directorate
OSA-A/OSACOM = Operational Support Airlift Activity/Operational Support Airlift Command

To remove facilities that would be vacant or redundant once the proposed projects are completed, approximately 30 DAAF buildings would be demolished under the Full Implementation Alternative and approximately 20 buildings would be demolished under the Partial Implementation Alternative.

Other reasonable alternatives identified during the scoping process may be considered for analysis in the EIS.

Comments from Agencies and Tribes

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

May 16, 2018

Ms. Heather Cisar
U.S. Army Corps of Engineers
Planning Division
2 Hopkins Plaza
Baltimore, MD 21201

Re: Scoping to Prepare an Environmental Impact Statement on a proposed Area Development Plan for Davison Army Airfield, U.S. Army Garrison Fort Belvoir, Virginia

Dear Ms. Cisar:

In accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act and the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR 1500-1508), the U.S. Environmental Protection Agency has reviewed your letter dated April 23, 2018 requesting scoping comments on the subject action.

Department of Army plans to prepare an Environmental Impact Statement (EIS) to assess the potential impacts of implementing a proposed Area Development Plan (ADP) for Davison Army Airfield (DAAF). The proposed ADP is intended to guide development at DAAF over the next three decades. The ADP identifies multiple new construction, renovation, and demolition projects that remedy existing deficiencies in DAAF's infrastructure and adequately accommodate the space and functional needs of DAAF's tenants. It is anticipated that the EIS will analyze three alternatives including no action, full, and partial implementation alternatives.

EPA has included general information to be considered during the drafting of the EIS. We look forward to reviewing the document when it is prepared. If you have questions regarding these comments, the staff contact for this project is Nora Theodore; she can be reached at 215-814-2728.

Sincerely,

Barbara Rudnick
NEPA Team Leader
Office of Environmental Programs

Enclosure (1)

Purpose and Need

Since the range of alternatives evaluated is defined by the purpose and need for the project, it is important that the purpose and need be clearly identified in the Environmental Impact Statement (EIS). The purpose or objective of the proposal should be defined in relationship to the need for the action. Therefore, the need for the action should identify and describe the underlying problem or deficiency; facts and analyses supporting the problem or deficiency in the particular location at the particular time should be specified; and the context or perspective of the agency mission in relation to the need for action should be stated.

Alternatives Analysis

As described in the regulations of the Council on Environmental Quality (CEQ) (40 CFR §1502.14), the examination and comparison of the alternatives under consideration is the heart of the environmental document. It is through this comparison that the lead agency is able to incorporate agency and public input to make informed decisions with regard to the merits of the project and the advantages and disadvantages of each of the alternatives being studied. Consequently, the CEQ regulations require that the details of each alternative, including the "no action" alternative be clearly presented in a comparative form for easy analysis by the reader. The rationale for the selection of the preferred demolition/construction alternative should be clearly stated in the analysis. For those alternatives that are eliminated from consideration, the reasons for their elimination should be given.

Land Use and Applicable Regulation

The project area should be described in detail and quantified, specifying the type and acreage of land impacted as well as a description of the existing buildings on the site including their current and past use. Discuss any permits required before commencement of the project. This may include a Section 404/Section 10 permit from the Corps of Engineers, state water quality certification, and local construction and zoning permits.

In addition to NEPA, other laws, regulations, permits, licenses and Executive Orders may be applicable to the Proposed Action. EPA recommends a summary of applicable regulatory requirements and approvals with which the Proposed Action will demonstrate compliance be discussed in the EIS.

ENVIRONMENTAL IMPACTS

The EA should examine the potential direct and indirect impacts of the project on the environment and mitigation measures for any adverse environmental impacts be described. Areas that mandate individual attention are described below.

Some useful information can be gleaned from on-line tools, such as:

- EnviroMapper: https://www.epa.gov/waterdata/waters-watershed-assessment-tracking-environmental-results-system - The Watershed Assessment, Tracking & Environmental Results System (WATERS) unites water quality information previously available only from several independent and unconnected databases

- Envirofacts: https://www3.epa.gov/enviro - Includes enforcement and compliance information

- NEPAssist: https://www.epa.gov/nepa/nepassist - NEPAssist is a tool that facilitates the environmental review process and project planning in relation to environmental considerations. The web-based application draws environmental data dynamically from EPA Geographic Information System databases and web services and provides immediate screening of environmental assessment indicators for a user-defined area of interest.

- 303(d) Listed Impaired Waters: https://www.epa.gov/exposure-assessment-models/303d-listed-impaired-waters

- Watershed Resources Registry: https://watershedresourcesregistry.org/index.html. This newly released mapping and screening tool prioritizes areas for preservation and restoration of wetlands, riparian zones, terrestrial areas, and stormwater management across several states in the mid-Atlantic region, including Pennsylvania. This tool is useful for planners to access environmental data to avoid impacting natural areas and identify optimal mitigation areas.

Air Resources

Attainment/Non-attainment: EPA, under the requirements of the 1970 Clean Air Act (CAA) as amended in 1977 and 1990, has established National Ambient Air Quality Standards (NAAQS) for six contaminants, referred to as criteria pollutants (40 CFR 50). These are: ozone (O3), carbon monoxide (CO), nitrogen dioxide (NO2), particulate matter (PM), lead (Pb), and sulfur dioxide (SO2). Particulate matter is divided into two classes, coarse particulate matter (PM10), i.e., particulates between 2.5 and 10 microns in diameter, and fine particulate matter (PM 2.5), i.e., particles less than 2.5 microns in diameter. The EIS should identify areas that meet the NAAQS standard for a criteria pollutant as well as those areas where a criteria pollutant level exceeds the NAAQS.

Conformity Analysis: A general conformity rule analysis should be conducted according to the guidance provided by the EPA in Determining Conformity of General Federal Actions to State or Federal Implementations Plans. Under the general conformity rule, reasonable foreseeable emissions associated with all operation and demolition/construction activities, both direct and indirect, should be quantified and compared to the annual de minimis levels for those pollutants in nonattainment for that area.

Demolition Permit Requirements/Temporary Impacts: To eliminate a NAAQS violation, DAAF should control or minimize demolition emissions through use of Best Management Practices (BMPs) and appropriate safety methods associated with each proposed demolition action.

Water Resources

All water quality issues including surface water, groundwater, drinking water, stormwater management, wastewater management, wetlands, oceans and watersheds should be considered in the EIS.

Groundwater: EPA recommends the principal aquifers in the region be identified and described. All wells, both public and private, that could potentially be affected by the project should be identified. Areas of groundwater recharge in the vicinity should also be identified and any potential impacts from the proposed action examined.

Surface Water Resources: EPA requests that the EIS outline measures to protect surface waters. EPA recommends the aquatic ecosystem be evaluated carefully and include a detailed discussion of runoff, sediment, and erosion control measures. Such mitigation measures would address both short-term demolition/construction impacts and long term project impacts.

Chesapeake Bay Watershed: Chesapeake Bay Executive Order 13508, Protecting and Restoring a National Treasure, tasked a team of federal agencies to draft a way forward for protection and restoration of the Chesapeake watershed. This team, the Federal Leadership Committee for the Chesapeake Bay, developed the *Strategy for Protecting and Restoring the Chesapeake Bay Watershed.* This strategy sets out clear and aggressive goals, outcomes, and objectives to be accomplished through 2025 by the federal government, working closely with state, local, and nongovernmental partners, to protect and restore the health of the Chesapeake Bay watershed. The strategy deepens the federal commitment to the Chesapeake region, with agencies dedicating unprecedented resources, targeting actions where they can have the most impact, ensuring that federal lands and facilities lead by example in environmental stewardship and taking a comprehensive, ecosystem-wide approach to restoration. Please discuss if the Proposed Action will impact the Chesapeake Bay Watershed and potential measures to reduce/mitigate these impacts.

Wetlands: Wetlands present on, or immediately surrounding the site, should be delineated according to the 1987 Federal Manual for Identifying and Delineating Jurisdictional Wetlands**.** The total size of the wetlands should be provided, in addition to the size of the wetland in the study area and size of the direct impact. Impacts to wetlands should be avoided or minimized whenever possible. Specifically, it is recommended that other locations than Anderson Park be explored for construction of the proposed parking lot. Once all alternatives have been explored, if significant adverse effects on wetlands must occur because of the proposed action, an important part of the process will be for DAAF to analyze the size and functional values of all impacted wetlands and develop a mitigation plan for their protection.

Stormwater Management/Low Impact Development: Stormwater runoff in urban and developing areas is one of the leading sources of water pollution in the United States. In recognition of this issue, Congress enacted Section 438 of the Energy Independence and Security Act of 2007 (EISA) to require federal agencies to reduce stormwater runoff from federal development and redevelopment projects to protect water resources. Implementation of Section 438 of the EISA can be achieved through the use of the green infrastructure/low impact development (GI/LID) infrastructure tools described in the Technical Guidance (https://19january2017snapshot.epa.gov/sites/production/files/2015-09/documents/eisa-438.pdf). For more information on specific GI/LID practices and how they function, visit: www.epa.gov/greeninfrastructure and www.epa.gov/nps.lid. The intention of the statute is to maintain or restore the pre-development site hydrology during the development or redevelopment process and ensure that receiving waters are not negatively impacted by changes in runoff temperature, volumes, durations and rates resulting from federal projects.

Floodplains: As the public notice announced, the proposed action could result in significant adverse effects on the 100-yr floodplain associated with Accotink Creek. Floodplain encroachments should be evaluated and coordinated with the Federal Emergency Management Agency (FEMA). EPA recommends federal agencies use natural systems, ecosystem processes, and nature-based approaches to identify alternatives and that federal agency regulations or procedures to be consistent with the Federal Flood Risk Management Standard (FFRMS). The FFRMS is a flexible framework to increase resilience against flooding and help preserve the natural values of floodplains. Incorporating this standard will

ensure that agencies expand management from the current base flood level to a higher vertical elevation and corresponding horizontal floodplain to address current and future flood risk and ensure that projects funded with taxpayer dollars last as long as intended.

Physiography

EPA recommends the physical and natural resources of the project area be described including physiographic provinces, topography, climate and geologic setting. Soils at the project should be mapped and outlined. Distribution and classification of soils within the study area, and the major soil types found at the project site should be described. Because soils have the potential to be impacted by demolition/construction activities, please state the intent to sample soils and follow-up actions if contamination exceeds safety thresholds.

Terrestrial Resources

EPA suggests the EIS provide a description of the terrestrial habitat resources in the study area, which can include species lists for mammals, birds, amphibians, reptiles, and plants present, a summary of composition and characteristics of each community type and the functions and total acreage indicated. Please discuss potential impacts to these communities as a result of demolition/construction activities and possible mitigation measures to minimize/avoid impacts. Furthermore, EPA recommends the planned excavation and grading of a wooded knoll at DAAF to eliminate airfield clearance violations be clearly explained and appropriate avoidance and mitigation measures explored.

Threatened and Endangered Species

The Endangered Species Act (ESA) provides for the listing of endangered and threatened species of plants and animals as well as the designation of critical habitat for listed species. The ESA prohibits the taking of any listed species without (for federal agencies) an "Incidental Take Statement." EPA requests threatened or endangered species be included with a description of terrestrial wildlife and aquatic species in the study area; and critical habitat for threatened or endangered species be identified. The EIS should describe the potential project impacts to these species as well as mitigation measures to minimize/avoid impacts. The most recent state and federal threatened and endangered species coordination letters should be included in the EIS. In addition, we recommend that the appropriate state and federal agencies be contacted annually at a minimum regarding these issues.

Waste Management

Please identify and evaluate hazardous sites in or near the study area. This would include sites being investigated under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund) or sites regulated under the Resource Conservation and Recovery Act (RCRA). Any impact of these sites on the alternatives or implications to construction methods should be considered (and/or impact of new construction on any ongoing cleanup or recovery activities).

RCRA set standards for hazardous waste treatment, storage, and disposal facilities. The management of hazardous waste at a proposed facility should be conducted in compliance with RCRA. The EIS should state if a Hazardous Waste Management Plan and a Hazardous Waste Minimization Plan are in place. Please identify known hazardous materials, including asbestos-containing materials (AM), lead-based paint (LBP), and oil and other hazardous materials (OHMs), located within the study

area. The status of the materials should be discussed as well as remedial methods described (if applicable) in addition to providing a detailed plan for proper disposal.

COMMUNITY IMPACTS

Noise: EPA retains authority to investigate and study noise and its effect, disseminate information to the public regarding noise pollution and its adverse health effects, respond to inquiries on matters related to noise, and evaluate the effectiveness of existing regulations for protecting the public health and welfare, pursuant to the Noise Control Act of 1972 and the Quiet Communities Act of 1978. Studies have shown that there are direct links between noise and health, including hearing loss, stress-related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity. Please discuss potential noise impacts that may result from the Proposed Action.

Socioeconomics: Discuss the socioeconomic and cultural status of the area, including the number of people, employees and/or jobs impacted as a result of the proposed project. The EIS should address the decrease or increase of people/employees/jobs in relation to its effect on tax base, local housing, job markets, schools, utilities, businesses, etc.

Traffic and Transportation: The EIS should address traffic and transportation as it relates to the Proposed Action. It may be necessary to provide an evaluation of existing roads specifying existing levels of service at major intersections near the project area as well as accident data. If appropriate, an evaluation of the impacts associated with an increased number of employees should be provided. The EIS should discuss existing and proposed public transportation to the area under consideration and provide estimates of expected usage. Traffic projections should then be made to show expected conditions for a completed project, if applicable.

Environmental Justice: Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,* directs each federal agency to incorporate environmental justice into its mission and activities by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations…." The Executive Order also explicitly called for the application of equal consideration for Native American programs. The EIS should identify Environmental Justice (EJ) communities in the study area and discuss potential impacts that the Proposed Action may have on these communities. To assist in this effort, EPA has developed an EJ mapping and screening tool called EJSCREEN. It is based on nationally consistent data and an approach that combines environmental and demographic indicators in maps and reports. It can be accessed at: **https://www.epa.gov/ejscreen.** Additionally, please consider referring to "Promising Practices for EJ Methodologies in NEPA Reviews": https://www.epa.gov/environmentaljustice/ej-iwg-promising-practices-ej-methodologies-nepa-reviews

Human Health: Please discuss the human health risks associated with demolition/construction activities and estimate the nature and probability of adverse health effects in humans who may be exposed to contaminants.

Children's Health: Executive Order 13045, *Protection of Children from Environmental Health Risks and Safety Risks,* requires each federal agency to identify and assess environmental health and safety risks to children. "Environmental health and safety risks" are defined as "risks to health or to safety that are attributable to products or substances that the child is likely to come in contact with or

ingest." When conducting assessments of environmental risks, the lead agency should consistently and explicitly take into account health risks to children and infants from environmental hazards. Please identify/discuss children in the study area and potential impacts that may result from the Proposed Action.

Cultural Resources: Consultation with the Maryland State Historic Preservation Officer throughout the planning process is strongly recommended to identify historic properties that may potentially be affected by the implementation of the Proposed Action and to seek ways to resolve potential adverse effects. Please include within the EIS a detailed description of the affected sites and potential impacts including correspondence with agencies and a Memorandum of Agreement, if applicable.

Energy Efficiency and Resiliency

EO 13693 has an overarching goal to maintain Federal leadership in sustainability and greenhouse gas emission reductions. The EO outlines a combination of efficient Federal operations to reduce agency emissions while fostering innovation, reducing spending and strengthening the communities in which Federal facilities operate. Information relating to EO 13693 can be obtained at the following link: https://www.epa.gov/greeningepa/executive-order-13693-planning-federal-sustainability-next-decade. Please include within the EIS how DAAF will reduce energy use and costs, increase efficiency, and build resiliency into project design.

Leadership in Energy and Environmental Design (LEED)

The LEED Green Building Rating System is a voluntary, consensus-based national standard for developing high-performance, sustainable buildings. LEED was created in order to define "green building" by establishing a common standard of measurement; promote integrated, whole-building design practices; recognize environmental leadership in the building industry; stimulate green competition; raise consumer awareness of green building benefits; and transform the building market. LEEP provides a complete framework for assessing building performance, emphasizing state of art strategies for sustainable site development, water savings, energy efficiency, materials selection and indoor environmental quality. LEED standards are currently available for: new construction and major renovation projects, existing building operations, commercial interiors projects, and core and shell projects. For more information, contact the U.S. Green Building Council at the following web address: http://www.usgbc.org/leed. Where feasible, please consider incorporating LEED into the project design.

Natural and Human Environment, Secondary and Cumulative Impacts

The Council on Environmental Quality (CEQ) in 40 CFR 1508.8 defines secondary effects as "caused by an action and are later in time or farther removed in distance but are still reasonably foreseeable". Examples of these could be the environmental effects of interconnected projects, such as additional infrastructure that may be needed to support the project.

Cumulative impacts can result from individually minor, but collectively significant actions taking place over a period of time. The CEQ in 40 CFR 1508.7 defines cumulative impacts as "impacts on the environment which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions." A cumulative impacts assessment should be a part of the EIS.

Distribution List

The EIS should include a Distribution List of agencies, organizations, and persons to whom copies of the document were sent. A Distribution List identifies those parties who have been given the opportunity to comment and reveals that those not included on the list may need to be given the EIS for review. This information is critical to ensuring all necessary parties are given the opportunity to review and provide input to the impacts associated with the Proposed Action.

From: Trivedi, Rahul [mailto:rahul.trivedi@vdot.virginia.gov]
Sent: Monday, May 14, 2018 1:13 PM
To: FortBelvoirNOI <FortBelvoirNOI@usace.army.mil>
Cc: Norman Whitaker <norman.whitaker@vdot.virginia.gov>; Elizabeth Jordan <elizabeth.jordan@vdot.virginia.gov>; James Cromwell <james.cromwell@vdot.virginia.gov>; Beacher Andrew eaw57986 <andrew.beacher@vdot.virginia.gov>; John Muse <john.muse@vdot.virginia.gov>; Lee Hall <leeann.hall@vdot.virginia.gov>; Horodyskyj Ivan ram84244 <ivan.horodyskyj@vdot.virginia.gov>; Stephen Bates <stephen.bates@vdot.virginia.gov>; Houda Ahmed Ali <houda.ali@vdot.virginia.gov>; Terry Yates <terry.yates@vdot.virginia.gov>; Allison Richter <allison.richter@vdot.virginia.gov>
Subject: [Non-DoD Source] Proposed Area Development Plan for Davison Army Airfield, Fort Belvoir

VDOT Northern Virginia District office staff has reviewed the scoping request for the proposed Area Development Plan (ADP) for Davison Army Airfield and offers the following comments:

1. The study should include an assessment of additional traffic that would be generated with the proposed changes, its impact on the highway network in the vicinity of the ADP and any mitigation needed as per the Chapter 527 Traffic Impact Analysis regulations. Information on Chapter 527 is available at the link below:

http://www.virginiadot.org/info/traffic_impact_analysis_regulations.asp
<http://www.virginiadot.org/info/traffic_impact_analysis_regulations.asp>

2. Route 1 in the vicinity of the ADP is identified as a Corridor of Statewide Significance by the Commonwealth Transportation Board. The corridor helps move people and goods between regions of Virginia and must be protected to ensure appropriate level of mobility for long distance travel.

3. Route 1 in the vicinity of ADP is also part of Arterial Preservation Network with a goal to enhance capacity and improve operational efficiency.

4. Suggest consulting with Fairfax County about any County planning requirements and regulations and whether they apply to this project.

Thank you for providing the opportunity to review and comment.

Rahul Trivedi P.E. |VDOT, NoVA District |Transportation Planning Manager|(O)-703-259-2308 (M) – 571-414-1023 |

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY
Street address: 629 East Main Street, Richmond, Virginia 23219
Mailing address: P.O. Box 1105, Richmond, Virginia 23218
www.deq.virginia.gov

Matthew J. Strickler
Secretary of Natural Resources

David K. Paylor
Director

(804) 698-4000
1-800-592-5482

April 20, 2018

U.S. Army Corps of Engineers
ATTN: Heather Cisar,
Planning Division
2 Hopkins Plaza, 10th Floor
Baltimore, Maryland 21201

RE: Scoping Request - Area Development Plan, Davison Army Airfield, Fort Belvoir, Virginia

Dear Ms. Cisar:

This letter is in response to the scoping request for the above-referenced project.

As you may know, the Department of Environmental Quality, through its Office of Environmental Impact Review (DEQ-OEIR), is responsible for coordinating Virginia's review of federal environmental documents prepared pursuant to the National Environmental Policy Act (NEPA) and responding to appropriate federal officials on behalf of the Commonwealth. Similarly, DEQ-OEIR coordinates Virginia's review of federal consistency documents prepared pursuant to the Coastal Zone Management Act which applies to all federal activities which are reasonably likely to affect any land or water use or natural resources of Virginia's designated coastal resources management area must be consistent with the enforceable policies Virginia Coastal Zone Management (CZM) Program.

DOCUMENT SUBMISSIONS

In order to ensure an effective coordinated review of the NEPA document and federal consistency documentation, notification of the NEPA document and federal consistency documentation should be sent directly to OEIR. We request that you submit one electronic to eir@deq.virginia.gov (25 MB maximum) or make the documents available for download at a website, file transfer protocol (ftp) site or the VITA LFT file share system (Requires an "invitation" for access. An invitation request should be sent to eir@deq.virginia.gov.). We request that the review of these two documents be done concurrently, if possible.

The NEPA document and the federal consistency documentation (if applicable) should include U.S. Geological Survey topographic maps as part of their information. We strongly encourage you to issue shape files with the NEPA document. In addition, project details should be adequately described for the benefit of the reviewers.

ENVIRONMENTAL REVIEW UNDER THE NATIONAL ENVIRONMENTAL POLICY ACT: PROJECT SCOPING AND AGENCY INVOLVEMENT

As you may know, NEPA (PL 91-190, 1969) and its implementing regulations (Title 40, *Code of Federal Regulations*, Parts 1500-1508) requires a draft and final Environmental Impact Statement (EIS) for federal activities or undertakings that are federally licensed or federally funded which will or may give rise to significant impacts upon the human environment. An EIS carries more stringent public participation requirements than an Environmental Assessment (EA) and provides more time and detail for comments and public decision-making. The possibility that an EIS may be required for the proposed project should not be overlooked in your planning for this project. Accordingly, we refer to "NEPA document" in the remainder of this letter.

While this Office does not participate in scoping efforts beyond the advice given herein, other agencies are free to provide scoping comments concerning the preparation of the NEPA document. Accordingly, we are providing notice of your scoping request to several state agencies and those localities and Planning District Commissions, including but not limited to:

Department of Environmental Quality:
- DEQ Regional Office*
- Air Division*
- Office of Wetlands and Stream Protection*
- Office of Local Government Programs*
- Division of Land Protection and Revitalization
- Office of Stormwater Management*

Department of Conservation and Recreation
Department of Health*
Department of Agriculture and Consumer Services
Department of Game and Inland Fisheries*
Virginia Marine Resources Commission*
Department of Historic Resources
Department of Mines, Minerals, and Energy
Department of Forestry
Department of Transportation

Note: The agencies noted with a star (*) administer one or more of the enforceable policies of the Virginia CZM Program.

FEDERAL CONSISTENCY UNDER THE COASTAL ZONE MANAGEMENT ACT

Pursuant to the federal Coastal Zone Management Act of 1972, as amended, and its implementing regulations in Title 15, *Code of Federal Regulations*, Part 930, federal activities, including permits, licenses, and federally funded projects, located in Virginia's Coastal Management Zone or those that can have reasonably foreseeable effects on Virginia's coastal uses or coastal resources must be conducted in a manner which is consistent, to the maximum extent practicable, with the Virginia CZM Program.

Additional information on the Virginia's review for federal consistency documents can be found online at
http://www.deq.virginia.gov/Programs/EnvironmentalImpactReview/FederalConsistencyReviews.aspx

DATA BASE ASSISTANCE

Below is a list of databases that may assist you in the preparation of a NEPA document:

- DEQ Online Database: Virginia Environmental Geographic Information Systems

  Information on Permitted Solid Waste Management Facilities, Impaired Waters, Petroleum Releases, Registered Petroleum Facilities, Permitted Discharge (Virginia Pollution Discharge Elimination System Permits) Facilities, Resource Conservation and Recovery Act (RCRA) Sites, Water Monitoring Stations, National Wetlands Inventory:
  - www.deq.virginia.gov/ConnectWithDEQ/VEGIS.aspx

- DEQ Virginia Coastal Geospatial and Educational Mapping System (GEMS)

  Virginia's coastal resource data and maps; coastal laws and policies; facts on coastal resource values; and direct links to collaborating agencies responsible for current data:
  - http://128.172.160.131/gems2/

- MARCO Mid-Atlantic Ocean Data Portal

  The Mid-Atlantic Ocean Data Portal is a publicly available online toolkit and resource center that consolidates available data and enables users to visualize and analyze ocean resources and human use information such as fishing grounds, recreational areas, shipping lanes, habitat areas, and energy sites, among others.

  http://portal.midatlanticocean.org/visualize/#x=-73.24&y=38.93&z=7&logo=true&controls=true&basemap=Ocean&tab=data&legends=false&layers=true

- DHR Data Sharing System.

  Survey records in the DHR inventory:

  - www.dhr.virginia.gov/archives/data_sharing_sys.htm

- DCR Natural Heritage Search

  Produces lists of resources that occur in specific counties, watersheds or physiographic regions:
  - www.dcr.virginia.gov/natural_heritage/dbsearchtool.shtml

- DGIF Fish and Wildlife Information Service

  Information about Virginia's Wildlife resources:
  - http://vafwis.org/fwis/

- Environmental Protection Agency (EPA) Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) Database: Superfund Information Systems

Information on hazardous waste sites, potentially hazardous waste sites and remedial activities across the nation, including sites that are on the National Priorities List (NPL) or being considered for the NPL:

- www.epa.gov/superfund/sites/cursites/index.htm

- EPA RCRAInfo Search

  Information on hazardous waste facilities:

  - www.epa.gov/enviro/facts/rcrainfo/search.html

- EPA Envirofacts Database

  EPA Environmental Information, including EPA-Regulated Facilities and Toxics Release Inventory Reports:

  - www.epa.gov/enviro/index.html

- EPA NEPAssist Database

  Facilitates the environmental review process and project planning:
  http://nepaassisttool.epa.gov/nepaassist/entry.aspx

If you have questions about the environmental review process and/or the federal consistency review process, please feel free to contact me (telephone (804) 698-4204 or e-mail bettina.rayfield@deq.virginia.gov).

I hope this information is helpful to you.

Sincerely,



Bettina Rayfield, Program Manager
Environmental Impact Review and
Long-Range Priorities

COMMONWEALTH of VIRGINIA

Department of Historic Resources

Matt Strickler
Secretary of Natural Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Julie V. Langan
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
www.dhr.virginia.gov

2 May 2018

LTC Christopher L. Tomlinson
Department of the Army
U.S. Army Installation Management Command
Headquarters, U.S. Army Garrison Fort Belvoir
98200 Flagler Road, Suite 213
Fort Belvoir, Virginia 22060-5928

Re: Initiation of NEPA consultation for Area Development Plan (ADP) for Davison Army Airfield, Fort Belvoir, Fairfax County
DHR Project No. 2018-0282

Dear LTC Tomlinson:

The Department of Historic Resources (DHR) has received your letter of 18 April 2018 initiating consultation under the National Environmental Policy Act (NEPA) for the above referenced project. It is our understanding that U.S. Army Garrison Fort Belvoir is studying the environmental impacts anticipated by the proposed Area Development Plan (ADP) for Davison Army Airfield. The ADP has the potential to affect historic properties listed in or eligible for the National Register of Historic Places if present. We request that Fort Belvoir continue to consult with DHR on the ADP pursuant to NEPA and Section 106 of the National Historic Preservation Act, as amended, and its implementing regulation 36 CFR Part 800.

If you have any questions about our comments, please contact me at (804) 482-6090.

Sincerely,

Marc Holma, Architectural Historian
Division of Review and Compliance

C: Ms Christine Heacock, CRM Fort Belvoir

Administrative Services
10 Courthouse Ave.
Petersburg, VA 23803
Tel: (804) 862-6408
Fax: (804) 862-6196

Eastern Region Office
2801 Kensington Avenue
Richmond, VA 23221
Tel: (804) 367-2323
Fax: (804) 367-2391

Western Region Office
962 Kime Lane
Salem, VA 24153
Tel: (540) 387-5443
Fax: (540) 387-5446

Northern Region Office
5357 Main Street
PO Box 519
Stephens City, VA 22655
Tel: (540) 868-7029
Fax: (540) 868-7033

Matthew J. Strickler
Secretary of Natural Resources

Clyde E. Cristman
Director

COMMONWEALTH of VIRGINIA
DEPARTMENT OF CONSERVATION AND RECREATION

Rochelle Altholz
Deputy Director of Administration and Finance

Russell W. Baxter
Deputy Director of Dam Safety & Floodplain Management and Soil & Water Conservation

Thomas L. Smith
Deputy Director of Operations

May 21, 2018

Heather Cisar
USACE-Baltimore District
2 Hopkins Plaza
Baltimore, MD 21201

Re: Davidson Army Airfield, Fort Belvoir Area Development Plan EIS

Dear Ms. Cisar:

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.

According to the information currently in our files, the Accotink Bay – Gunston Cove Stream Conservation Unit is located downstream of the project site. Stream Conservation Units (SCUs) identify stream reaches that contain aquatic natural heritage resources, including 2 miles upstream and 1 mile downstream of documented occurrences, and all tributaries within this reach. SCUs are also given a biodiversity significance ranking based on the rarity, quality, and number of element occurrences they contain. The Accotink Bay – Gunston Cove SCU has been given a biodiversity ranking of B5, which represents a site of general significance. The natural heritage resources associated with this site are:

Lampsilis radiate	Eastern lampmussel	G5/S2S3/NL/NL
Glyptemys insculpta	Wood turtle	G3/S2/NL/LT

The Eastern lampmussel is a freshwater mussel which inhabits river systems in areas with substrates composed of silt, sand, cobble, gravel and exposed bedrock (NatureServe, 2009). This species has a wide range, from eastern Canada west to Ontario and Quebec and south to South Carolina (NatureServe, 2009). In Virginia, there are records from the Chowan and York River drainages.

Considered good indicators of the health of aquatic ecosystems, freshwater mussels are dependent on good water quality, good physical habitat conditions, and an environment that will support populations of host fish species (Williams et al., 1993). Because mussels are sedentary organisms, they are sensitive to water quality degradation related to increased sedimentation and pollution. They are also sensitive to habitat destruction through dam construction, channelization, and dredging, and the invasion of exotic mollusk species.

The Wood turtle ranges from southeastern Canada, south to the Great Lake states and New England. In Virginia, it is known from northern counties within the Potomac River drainage (NatureServe, 2009). The Wood turtle inhabits areas with clear streams with adjacent forested floodplains and nearby fields, wet meadows, and

farmlands (Buhlmann et al., 2008; Mitchell, 1994). Since this species overwinters on the bottoms of creeks and streams, a primary habitat requirement is the presence of water (Mitchell, 1994).

Threats to the wood turtle include habitat fragmentation, urbanization, and automobile or farm machinery mortality (Buhlmann et al., 2008). Please note that the Wood turtle is currently classified as threatened by the Virginia Department of Game and Inland Fisheries (VDGIF).

In addition, an unnamed tributary of Dogue Creek has been designated by the VDGIF as a "Threatened and Endangered Species Water" for the Wood turtle.

Furthermore, the Accotink Wetlands Conservation Site is located downstream of the project site. Conservation sites are tools for representing key areas of the landscape that warrant further review for possible conservation action because of the natural heritage resources and habitat they support. Conservation sites are polygons built around one or more rare plant, animal, or natural community designed to include the element and, where possible, its associated habitat, and buffer or other adjacent land thought necessary for the element's conservation. Conservation sites are given a biodiversity significance ranking based on the rarity, quality, and number of element occurrences they contain; on a scale of 1-5, 1 being most significant. Accotink Wetlands Conservation Site has been given a biodiversity significance ranking of B3, which represents a site of high significance. The natural heritage resources of concern at this site are:

Lathyrus palustris	Marsh pea	G5/S1/NL/NL
Bolboschoenus fluviatilis	River bulrush	G5/S2/NL/NL
Ranunculus ambigens	Water-plantain crowfoot	G4/S1/NL/NL
Carex vestita	Velvet sedge	G5/S2/NL/NL
	Tidal Freshwater Marsh (Mixed High Marsh Type)	G3/S4?/NL/NL
	Coastal Plain / Outer Piedmont Acidic Seepage Swamp	G3?/S3/NL/NL
	Northern Coastal Plain / Piedmont Mesic Mixed Hardwood Forest	G5/S5/NL/NL

In addition, Parker's pipewort (*Eriocaulon parkeri*, G3/S2/NL/NL) has been historically documented downstream of the project site. Parker's pipewort is classified as very rare to uncommon in Virginia. This diminutive pipewort species displays a greyish-white button flower and often occurs with other rare mudwort species in the intertidal zone of tidal regions from Maine to North Carolina. Potential threats include activities that alter natural river currents causing sedimentation, which could inhibit germination of seeds or smother seedlings, and/or erosion of the habitat. Other potential threats include activities that result in increased salinity levels, water pollution, and displacement by aggressive species (J. C. Ludwig, 1996). Parker's pipewort has been documented at 29 occurrences in Virginia with 11 of those historical or extirpated. Surveys for this species should be conducted during the flowering / fruiting period from July to October.

To minimize adverse impacts to the aquatic ecosystem as a result of the proposed activities, DCR recommends the implementation of and strict adherence to applicable state and local erosion and sediment control/storm water management laws and regulations. Due to the legal status of Wood turtle, DCR recommends coordination with Virginia's regulatory authority for the management and protection of this species, the VDGIF, to ensure compliance with the Virginia Endangered Species Act (VA ST §§ 29.1-563 – 570).

There are no 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 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 re-submit project information and map for an update on this natural heritage information if the scope of the project changes and/or six months has passed before it is utilized.

The VDGIF 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 http://vafwis.org/fwis/ or contact Ernie Aschenbach at 804-367-2733 or Ernie.Aschenbach@dgif.virginia.gov.

Should you have any questions or concerns, please contact me at 804-225-2429. Thank you for the opportunity to comment on this project.

Sincerely,



Tyler Meader
Project Review Assistant

CC: Amy Ewing, VDGIF

Literature Cited

Buhlmann, K, T. Tuberville, and W. Gibbons. 2008. Turtles of the southeast. University of Georgia Press. Athens, GA. 252 pp.

Ludwig, J. Christopher. 1996. Personal communication. Virginia Department of Conservation and Recreation, Division of Natural Heritage.

Mitchell, J. C. 1994. Reptiles of Virginia. Smithsonian Institution Press, Washington. pp. 88-91.

NatureServe. 2009. NatureServe Explorer: An online encyclopedia of life [web application]. Version 7.1. NatureServe, Arlington, Virginia. Available http://www.natureserve.org/explorer. (Accessed: April 8 and 27, 2010).

Williams, J.D., M.L. Warren, Jr., K.S. Cummings, J.L. Harris, and R.J. Neves. 1993. Conservation status of freshwater mussels of the United States and Canada. Fisheries 18: 6-9.

National Capital Planning Commission
401 9th Street, NW North Lobby, Suite 500 Washington, DC 20004 Tel 202 482 7200 Fax 202.482 7272 www.ncpc.gov

IN REPLY REFER TO:
NCPC FILE No. 7992

May 21, 2018

Ms. Heather Cisar
United States Army Corps of Engineers
Planning Division
2 Hopkins Plaza
Baltimore, Maryland 21201

Re: Davidson Army Airfield Area Development Plan Environmental Impact Statement Scoping Comments

Dear Ms. Cisar:

Thank you for the opportunity to provide scoping comments as part of the federal environmental review process for the Davidson Army Airfield Area Development Plan under the National Environmental Policy Act (NEPA). As the central planning agency for the federal government in the National Capital Region (NCR), NCPC has advisory review authority over federal projects at Fort Belvoir under the National Capital Planning Act (40 USC § 8722 (b) (1)).[1] We note that NCPC recently reviewed the Fort Belvoir Real Property Master Plan, granting final plan approval at our meeting in January, 2017. We will use this master plan and NCPC's Comprehensive Plan policies for the region as the basis for the Commission's review of the Area Development Plan (ADP).

Fort Belvoir Real Property Master Plan

NCPC staff notes that much of the land along the northeast-side of the existing airfield development has limited development potential based on a number of factors including designations as a Resource Protection Area, habitat corridor, wildlife migration corridor, riparian buffer area, and wetland area. As such, the Installation Vision and Development Plan (VDP) identifies the land as "Least Suitable for Development" and a "Constrained Development Area." Therefore, potential future development impacts to this environmentally-sensitive area should be minimized to the maximum extent possible, both during construction and once construction is complete. Future expansion should be positioned contiguously to existing development as much as possible, and trade-offs between environmental impacts and airfield requirements should be highlighted in as much detail as possible in the NEPA document for each alternative.

[1] The Planning Act requires federal agencies to advise and consult with NCPC in the preparation of agency plans prior to preparation of construction plans.

Transportation

Based on the installation master plan's sustainability goals and planned nearby transit, walking, and bicycle improvements, intended to support more sustainable, compact development at Fort Belvoir, parking should be limited in the airfield planning district as much as possible. However, in recognition of the airfield's unique purpose and secure nature of the facility (with limited transit access), should employee parking need to exceed NCPC's 1:1.5 (67%) goal, parking elsewhere on the installation should be scaled back to help attain the overall NCPC goal. The NEPA document should document all ADP parking impacts to overall installation-wide parking capacity.

Natural Resources and Sustainability

The future Environmental Impact Statement should capture construction and post-construction impacts to the natural environment using relevant metrics including:

- Change in total vegetation and tree canopy area;
- Change in total impervious surface area;
- Change in stormwater runoff volumes;
- Change in greenhouse gas emissions;
- Change in wetland and floodplain areas;
- Change in wildlife habitat; and
- Changes in the master plan-identified policy areas (Resource Protection Area, habitat corridor area, wildlife migration corridor area, and riparian buffer area).

The future Record of Decision (ROD) should describe how potential future adverse impacts to the natural and human environment will be fully mitigated based on Army, NCPC and County planning policies. For reference, NCPC encourages federal installations to adhere to local planning plans/policies as much as possible in an effort to be a "good neighbor", with plan mitigation adhering to local County policies to the maximum extent feasible.

NCPC Review / Coordination

Pursuant to Department of Defense (DoD) planning policies (Unified Facilities Criteria – Installation Master Planning), we recognize that installation master plans are supported by more detailed Area Development Plans and subsequent project-level site plans. As such, as a component of the current Fort Belvoir Master Plan, the airfield ADP should be submitted to NCPC for separate draft and final reviews. Please refer to our agency website for additional information regarding master plan submissions to NCPC at www.ncpc.gov/review/guidelines. In advance of future ADP submissions, we encourage consultation meetings with NCPC and County planning staff to ensure ADP compliance with local and regional federal policies as much as possible.

These comments have been prepared in accordance with NCPC's Environmental and Historic Preservation Policies and Procedures. NCPC appreciates the opportunity to provide scoping comments, and looks forward to our continued involvement throughout the NEPA process. If you have any questions about these comments, please contact Michael Weil at (202) 482-7253 or michael.weil@ncpc.gov, or please consult the NCPC website for further information on our legislative authorities, Comprehensive Plan, or project submission/review process.

Sincerely,

Diane Sullivan
Director, Urban Design and Plan Review Division

cc: Chris Landgraf, Fort Belvoir, Department of Public Works
Noel Kaplan, Fairfax County Department of Planning and Zoning

From: Arseneau, Laura [mailto:Laura.Arseneau@fairfaxcounty.gov]
Sent: Monday, May 21, 2018 3:56 PM
To: FortBelvoirNOI <FortBelvoirNOI@usace.army.mil>
Subject: [Non-DoD Source] Comments from Fairfax County Heritage Resources for Scoping for Davison Air Field (DAAF)

To whom it may concern,

My name is Laura Arseneau and I am commenting on behalf of the Planning Division- Heritage Resources with Fairfax County. I do have a few comments.

The project is located nearby to 3 county designated historic overlay districts: Mount Air, Pohick Church and Woodlawn.

Also, the following sites are designated on the Fairfax County Inventory of Historic Sites:

* La Grange
* Ft. Belvoir Military Railroad Historic Corridor
* Accotink United Methodist Church
* Camp Humphreys Pump Station

The primary concern is how the proposed changes will be viewed from these districts and how it may impact their historic character. In turn, I would like to know what the tallest structure will be with the new construction to determine impact and possible mitigation.

Also, as administrator to the county Architectural Review Board, I would like to request that the ARB be considered a stakeholder in regards to this development as two historic districts are directly adjacent to the subject property.

Thank you in advance for your consideration.

Thank you,

Laura Arseneau, AICP

Senior Historic Preservation Planner/

ARB Administrator

Fairfax County DPZ-PD

703-324-1209

Laura.arseneau@fairfaxcounty.gov <mailto:Laura.arseneau@fairfaxcounty.gov>

Blockedhttps://www.fairfaxcounty.gov/planning-zoning/historic <Blockedhttps://www.fairfaxcounty.gov/planning-zoning/historic>

P Please consider the environment before printing this email.

From: Theodore, Nora [mailto:theodore.nora@epa.gov]
Sent: Monday, April 30, 2018 10:44 AM
To: FortBelvoirNOI <FortBelvoirNOI@usace.army.mil>; Cisar, Heather R CIV CENAB CENAD (US) <Heather.R.Cisar@usace.army.mil>
Cc: Rudnick, Barbara <Rudnick.Barbara@epa.gov>
Subject: [Non-DoD Source] Ft Belvoir Scoping for EIS

Dear Ms. Cisar,

EPA has received the Department of the Army's notification of intent to prepare an Environmental Impact Statement (EIS) to assess the potential impacts of implementing a proposed Area Development Plan (ADP) which would guide development at Davison Army Airfield (DAAF) over the next three decades. We are currently preparing scoping comments to assist in the development of the project.

Additionally, we would be very willing to offer comments during the EIS development process on advance copies of the EIS or individual chapters if you are interested. On another note, I am hoping to attend the interagency scoping meeting on May 16th, however, if I cannot, will there be teleconference capabilities?

Thanks so much,

Nora Theodore

NEPA Reviewer

Office of Environmental Programs

Environmental Assessment and Innovation Division

US EPA, Region III

1650 Arch Street (3EA30)

Philadelphia, PA 19103

215-814-2728

From: Chris Daniel [mailto:cdaniel@achp.gov]
Sent: Wednesday, April 25, 2018 5:54 PM
To: FortBelvoirNOI <FortBelvoirNOI@usace.army.mil>
Cc: Heacock, Christine H CIV USARMY IMCOM (US) <christine.h.heacock.civ@mail.mil>
Subject: [Non-DoD Source] EIS Area Development Plan for Davison Army Airfield, Fort Belvoir

Thank you for including the Advisory Council on Historic Preservation (ACHP) in you notice of intent to prepare an Environmental Impact Statement for Area Development Plan for Davison Army Airfield at Fort Belvoir. The ACHP has no comments at this time; however, should the Army, through consultation with the Virginia SHPO, tribes, and other consulting parties, reach a determination of adverse effect, please invite the ACHP to participate at that time, pursuant to our regulations 36CFR800.6(a)(1

Sincerely,

Christopher Daniel
Program Analyst
Advisory Council on Historic Preservation
202.517.0223 (Office & Mobile)
cdaniel@achp.gov

Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington DC 20001-2637
(202) 517-0200 (Main Number)

ACHP offers NEW free and low-cost e-learning courses for the public, applicants, and NEPA-106 practitioners. Learn more at Blockedhttp://www.achp.gov/elearning.html <Blockedhttp://www.achp.gov/elearning.html>

From: Weil, Michael [mailto:michael.weil@ncpc.gov]
Sent: Thursday, May 17, 2018 9:26 AM
To: FortBelvoirNOI <FortBelvoirNOI@usace.army.mil>
Cc: Kuriger, Jarrod C CIV USARMY IMCOM ATLANTIC (US) <jarrod.c.kuriger.civ@mail.mil>
Subject: [Non-DoD Source] Scoping Meeting Presentation

Hi Heather,

If possible, would you please send me the presentation that you provided to us at yesterday's agency Scoping meeting? Specifically, I am interested in the slides that show each of the alternatives.

thanks. - Mike Weil, NCPC, 202-482-7253

From: Ross Bradford [mailto:RBradford@savingplaces.org]
Sent: Wednesday, May 16, 2018 5:03 PM
To: FortBelvoirNOI <FortBelvoirNOI@usace.army.mil>
Cc: Betsy Merritt <emerritt@savingplaces.org>; Amanda Phillips <APhillips@savingplaces.org>
Subject: [Non-DoD Source] Scoping Meeting: EIS Davison Army Airfield

Dear Ms. Cisar:

On April 25, 2018 the National Trust received your April 18, 2018 notice regarding the May 16, 2018 Scoping Meeting on the EIS for the Davison Army Airfield. Please provide the National Trust with information about this issue so that we can review and comment on it. As no information to review was provided with your April 18 letter and it appears that the first opportunity to view material related to the proposed undertaking is at tonight's meeting, we kindly request that you extend the deadline to 30 days upon receipt of those materials.

We look forward to hearing from you.

Sincerely,

Ross

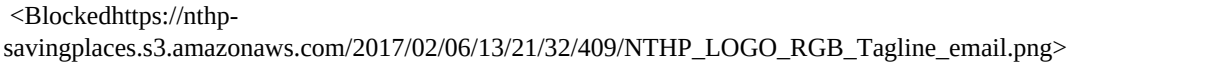
Ross M. Bradford | SENIOR ASSOCIATE GENERAL COUNSEL

P 202.588.6252 <tel:202.588.6252> F 202.588.6272 <tel:202.588.6272>

NATIONAL TRUST FOR HISTORIC PRESERVATION
The Watergate Office Building

2600 Virginia Avenue NW Suite 1100 Washington, DC 20037 <x-apple-data-detectors://7/1>

Blockedwww.PreservationNation.org <Blockedhttp://www.preservationnation.org/>



From: Warren, Arlene [mailto:arlene.warren@vdh.virginia.gov]
Sent: Friday, May 18, 2018 2:55 PM
To: rr Environmental Impact Review <eir@deq.virginia.gov>; FortBelvoirNOI <FortBelvoirNOI@usace.army.mil>
Subject: [Non-DoD Source] Re: SCOPING REQUEST Army ADP for Davison Army Airfield

The Office of Drinking Water does not have comments on this project at this stage.

Best Regards,

Arlene Fields Warren

GIS Program Support Technician

Office of Drinking Water

Virginia Department of Health

109 Governor Street

Richmond, VA 23219

(804) 864-7781

From: Caitlin Rogers [mailto:caitlinh@ccppcrafts.com]
Sent: Wednesday, May 16, 2018 11:54 AM
To: FortBelvoirNOI <FortBelvoirNOI@usace.army.mil>
Subject: [Non-DoD Source] EIS for implementing ADP for DAAF

Ms. Cisar,

We request a copy of the minutes for the meeting. Thanks

Caitlin

--

Caitlin Rogers
Catawba Indian Nation
Tribal Historic Preservation Office
1536 Tom Steven Road
Rock Hill, SC 29730

803-328-2427 ext. 226
Caitlinh@ccppcrafts.com <mailto:Caitlinh@ccppcrafts.com>

Please Note: We CANNOT accept Section 106 forms via e-mail, unless requested. Please send us hard copies. Thank you for your understanding

Public Comments

From: Catherine Ledec [mailto:ledecinvirginia@yahoo.com]
Sent: Saturday, April 28, 2018 6:24 AM
To: FortBelvoirNOI <FortBelvoirNOI@usace.army.mil>
Subject: [Non-DoD Source] Typographical error in link: Re: Fw: Attn: Heather Cisar: Environmental Impact Statement for Area Dev. Plan, Davison Army Airfield, Fort Belvoir

Dear Ms. Cisar:

There is typographical error in the link from the Fort Belvoir Environmental docs web page to this project. The link spells it Davidson rather than Davison. Even when I correct this typo the link only shows the federal register notice and there still are no documents to be reviewed posted on the project page. This seems like an error that the documents are not posted for the 30 day comment period.

Please forward a link to these so that I can share this with Mount Vernon District and other non-governmental organizations in the area.

Thanks.
Cathy Ledec

On Friday, April 27, 2018, 3:10:54 PM EDT, Catherine Ledec <ledecinvirginia@yahoo.com> wrote:

Dear Ms. Cisar:

Are there project documents posted somewhere online for review?
If you can point me to these that would be very helpful. I am not able to locate these online.

Thank you so very much,
Cathy Ledec
Chair, Environment and Recreation Committee Mount Vernon Council of Citizens' Associations
703-346-0814

----- Forwarded Message -----
From: Catherine Ledec <ledecinvirginia@yahoo.com>
To: FortBelvoirNOI@usace.army.mil <FortBelvoirNOI@usace.army.mil>
Sent: Wednesday, April 25, 2018, 2:08:14 PM EDT
Subject: Attn: Heather Cisar: Environmental Impact Statement for Area Dev. Plan, Davison Army Airfield, Fort Belvoir

Dear Ms. Cisar:

I received notice of the Environmental Impact Statement for Area Development Plan, Davison Army Airfield, Fort Belvoir.

I write to request a presentation to the Mount Vernon Council of Citizens' Associations on this project. With a public comment period ending on May 18, 2018 it would be important if this can be done at the next meeting of the Environment and Recreation Committee of the MVCCA. Our next meeting is May 2, 2018 at 7.15pm.

While we have other items on our agenda we would welcome hearing about this project in the Mount Vernon District of Fairfax County.

I look forward to your reply.
Sincerely,
Cathy Ledec
Chair, Environment & Recreation Committee Mount Vernon Council of Citizens' Associations
703-346-0814

From: Gloria Canon [mailto:gloriac@eltiempolatino.com]
Sent: Wednesday, May 02, 2018 11:02 AM
To: FortBelvoirNOI <FortBelvoirNOI@usace.army.mil>; heather.cisar@usace.army.mil
Subject: [Non-DoD Source] EL TIEMPO LATINO NEWSPAPER - PUBLICATIONS - ANNOUNCEMENTS

Heather Cisar
US Army Corpsof Engineers
Planning Division

Hi Heather
My name is Gloria Canon, Account Executive at El Tiempo Latino Newspaper

If your interested in reaching out to the Hispanic Community then we will be a good resource to help you reach this target demographic.
I will follow up with a call or email to see how I can get earn your commitment to advertise with El Tiempo Latino.

There are many solid reasons to advertise with us:

* 52,000 copies for circulation every Friday
* Distribution in MD, VA, and DC
* A growing Latino community in the area *Most widely read Spanish language publication with over 100,000 readers
* It is a free weekly newspaper.
* It is distributed in colorful news boxes at over 1,600 locations.

Please feel free to contact me for further assistance at 202-334-9160 <tel:(202)%20334-9160>

Thank you and have a great day,

Attached Media Kit --

--

Gloria Canon

Ph. 202-334-9160

Cel 202-375-9399

El Tiempo Latino // El Planeta

Washington, DC // Boston, MA

Blockedwww.eltiempolatino.com <Blockedhttp://www.eltiempolatino.com/>

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Appendix B – Aircraft Noise Modeling Report

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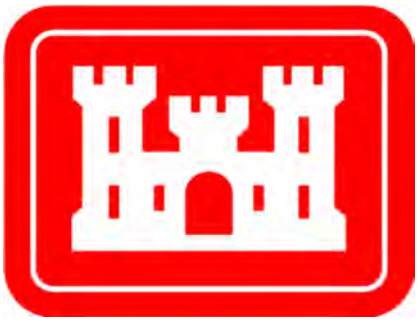
Aircraft Noise Modeling Report

Davison Army Air Field, US Army Garrison Fort Belvoir, Fort Belvoir, Virginia

Prepared for:

US Army Corps of Engineers

Baltimore District



Prepared by:

AVATAR ENVIRONMENTAL AECOM

Contract #W912DR - 13 - D – 0014/0004

July 2019

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1 Introduction

This report describes noise conditions around Davison Army Airfield (DAAF), Fort Belvoir, Virginia, based on operational data collected in 2017. It was prepared to support the preparation of an Area Development Plan (ADP) for DAAF and the associated Environmental Impact Statement (EIS) that will assess the potential environmental impacts of implementing the ADP in compliance with the National Environmental Policy Act (NEPA). The text of the report will be incorporated into the EIS as appropriate, and the analysis will provide the baseline that will be used to assess noise impacts from the alternatives evaluated in the EIS.

The noise contours presented in this report are updates to those shown in the *Operational Noise Consultation, 52-EN-0DRM-11* prepared by the US Army Public Health Command in September 2010. The updated contours were developed using the Department of Defense's (DoD) NOISEMAP model and Advanced Acoustic Model (AAM) with data inputs gathered from interviews with DAAF's airfield manager, air traffic controllers, pilots, and engine maintenance personnel on 7 and 8 March 2017. The data reflect the number of flight operations, runway usage rates, flight tracks and profiles, and engine maintenance run-up statistics obtained in early 2017.

2 Noise Fundamentals and Methodology

2.1 Noise Fundamentals

Noise is unwanted or undesirable sound that interferes with or disrupts normal human activities. Although continuous and extended exposure to high noise levels (e.g., through occupational exposure) can cause hearing loss, the principal human response to noise is annoyance. The response of different individuals to similar noise events varies and is influenced by the type of noise, the perceived significance of the noise, its appropriateness in the setting, the time of day, the type of activity during which the noise occurs, and the sensitivity of the individual.

The loudest sounds that can be detected comfortably by the human ear have intensities that are a trillion times higher than those of sounds that can barely be detected. This vast range means that using a linear scale to represent sound intensity is not practical. The decibel (dB) is a logarithmic unit used to represent the intensity of a sound, or sound level. All sounds have a spectral content, which means their magnitude or level changes with frequency, where frequency is measured in cycles per second, or Hertz. To mimic the human ear's non-linear sensitivity and perception of different sound frequencies, the spectral content is weighted. Environmental noise measurements are usually made on an "A-weighted" scale that filters out very low and very high frequencies to better replicate human sensitivity. It is common to add the "A" to the measurement unit to indicate that the measurement has been made using this filtering process (dBA).

2.2 Day-Night Average Sound Level

Different metrics (i.e., systems for measuring or quantifying a particular characteristic of a subject) have been developed to quantitatively describe the noise environment. The choice of metric varies

depending on the type of noise being considered and the purpose of the quantification. The Day-Night Average Sound Level (DNL) metric is the most commonly used tool for analyzing noise generated by airfield operations and is the metric used in this report.

The DNL metric is the energy-averaged sound level measured over a 24-hour period, with a 10-dB penalty assigned to noise events occurring between 10 p.m. and 7 a.m. (acoustic night). DNL values are average quantities, mathematically representing the continuous sound level that would be experienced if all the variations in sound level that occur over a 24-hour period were averaged to have the same total sound energy. The DNL metric quantifies the total sound energy and is a cumulative measure, but it does not provide specific information on the number of noise events or the intensity of the individual sound events that occur during the 24-hour measurement period. Finally, DNL values do not represent a single specific 24-hour period but rather an annual average day.

DNL is the standard noise metric used by the U.S. Department of Housing and Urban Development (HUD), the Federal Aviation Administration (FAA), the U.S. Environmental Protection Agency (USEPA), and DoD. Studies of community annoyance in response to various types of environmental noise have shown that DNL correlates well with perceived noise impacts; that is, there is a consistent relationship between DNL and reported levels of annoyance. Research indicates that a large majority of the population (about 87 percent) is not highly annoyed by outdoor sound levels below 65 dB DNL[1] .

2.3 Noise Guidelines and Criteria

Federal agencies have adopted guidelines for assessing noise impacts that provide both a characterization of the existing noise environment and a measure of project-induced impacts when applicable. In June 1980, the Federal Interagency Committee on Urban Noise (FICUN) published guidelines relating DNL to compatible land uses. This committee was composed of representatives from the DoD, U.S. Department of Transportation, HUD, USEPA, and U.S. Veterans Administration (VA).

Following the lead of the committee, DoD has adopted the noise zone concept of land use compatibility as the measure of aircraft noise effect. To address the potential impacts of aircraft operations, DoD defined noise zones with associated recommendations regarding compatible land uses as described in *Instruction 4165.57 Incorporating Change 2* (*Air Installations Compatible Use Zones [AICUZ]*), dated November 9, 2017.

According to the instruction, "*the Army shall apply Operational Noise Management Program DNL designations of 60-65, 65-75, and greater than 75 at its air installations. Contours below 65 DNL are not required but may be provided if local conditions warrant discussion of lower aircraft noise levels, such as in rural and desert areas, or where significant noise complaints have been received from areas outside DNL 65 contours*."

[1] Federal Interagency Committee on Urban Noise, *Guidelines for Considering Noise in Land Use Planning and Control,* Washington DC, 1980

The Army has developed guidelines for addressing land use compatibility within specific noise zones, as shown in **Table 1**. Noise-sensitive land uses typically include residential areas, schools, hospitals, and churches.

Table 1: Noise Zones

Noise Zone	Aviation DNL (dBA)	Land Use Recommendation
Land Use Planning Zone (LUPZ)	60 – 65	For land use planning purpose.
I	< 65	Generally acceptable with any residential or noise-sensitive uses.
II	65–75	Normally not recommended with residential or noise-sensitive uses.
III	>75	Not recommended with any residential or noise-sensitive uses.

Sources: US Army Center for Health Promotion and Preventive Medicine, *Operational Noise Manual – An Orientation for Department of Defense Facilities*, November 2005; Army Regulation 200-1, *Environmental Protection and Enhancement*, August 2007

2.4 Methodology

DNL contours for this report were generated using the NOISEMAP computer model for fixed wing aircraft and the AAM for rotary wing helicopters. AAM is a computer program that calculates community noise from aircraft flight operations. It is an advanced noise simulation model and can accommodate multiple noise sources (e.g., engines, airframe components [e.g., flaps, landing gear, slats]), each represented by a sphere of spectral data at a reference distance. Propagation to the ground accounts for spherical spreading, atmospheric absorption, ground impedance effects, and weather effects. Spectral levels and a variety of community noise metrics can be computed and plotted on level or unlevel terrain. Input data for the model include the types, frequency, and location of noise-generating operations at the subject airfield. For this study, data sources included interviews with DAAF pilots, maintenance personnel, planners, schedulers, and air traffic controllers. The data from these sources were compiled and integrated into a general description of noise-generating activities at DAAF. The description included the type and frequency of flight operations from the various aircraft operating at DAAF; the airfield layout; runway utilization; flight tracks; and flight profiles.

2.4.1 Flight Tracks

Flight tracks represent the "typical" paths of airfield flight operations. An operation is any takeoff or landing at the airfield. The takeoff and landing may be part of a training maneuver (or "pattern") in the vicinity of the runway or may simply be a departure or arrival of an aircraft. Flight operations conducted at DAAF include:

- **Departure:** An aircraft taking off from a runway.
- **Non-break Arrival:** An aircraft straight-in landing on a runway.

- **Overhead Arrival:** A special type of approach in that instead of straight-in, the aircraft splits off to the left or right making a spiral-like descent to the ground using Visual Flight Rules (VFR). (VFR is a standard set of rules that govern the procedures for conducting flight under visual conditions: pilots remain clear of clouds, avoid other aircraft, and usually fly unassisted by Air Traffic Control.)
- **Patterns:** Patterns refer to operations where the aircraft travels in a loop (once to multiple times). Patterns are designed with either left or right hand turns depending on variables that include airport design/layout and urban development/noise restrictions. Pattern flights at DAAF only involve helicopter "touch-and-go" exercises. In a touch-and-go pattern, an aircraft lands and takes off on a runway without coming to a full stop. After touching down, the pilot immediately goes to full power and takes off again.

Arrival and departure flight tracks are shown on **Figures 1a** and **1b** (arrivals) and **Figure 2a** and **2b** (departures). **Figure 3** shows closed pattern flight tracks. Although flight paths are represented as lines, the exact trajectory followed by an aircraft may vary because of aircraft performance, pilot technique, or wind and other weather conditions. Therefore, actual flight tracks are better thought of as bands rather than simple lines.

2.4.2 Flight Operations

For the purpose of noise modeling, operations are defined as a given number of takeoffs and landings; patterns are counted as two operations since each includes a landing and a takeoff. Following data collection through airfield interviews, aircraft operations data were tabulated by flying unit, aircraft, operation type, and sortie type (a sortie is the specific flight mission of one aircraft.) The compiled operational input parameters were validated by each flying unit before proceeding with development of the model.

Figure 1a: Arrival Flight Tracks – Runway 14

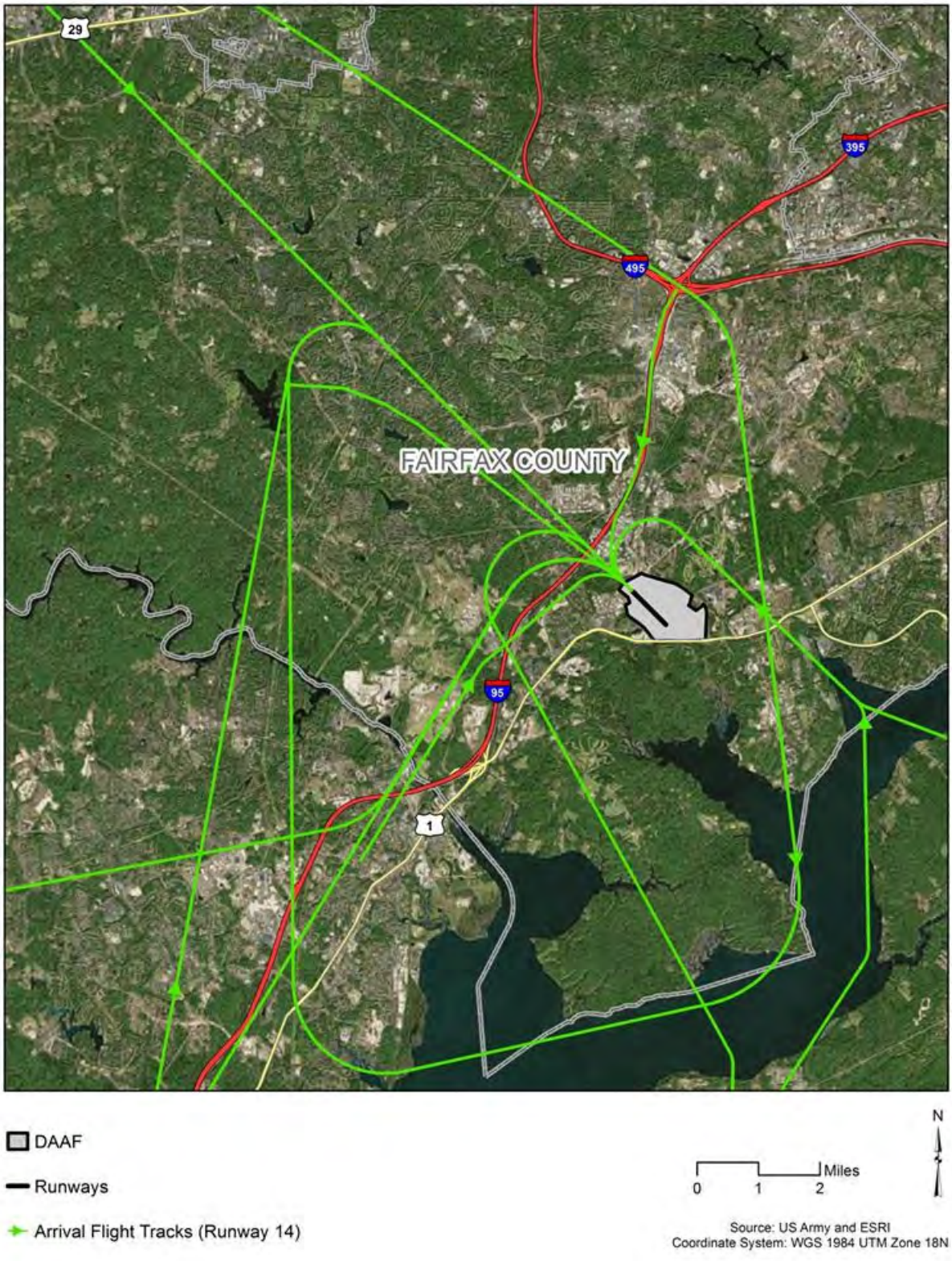


Figure 1b: Arrival Flight Tracks – Runway 32

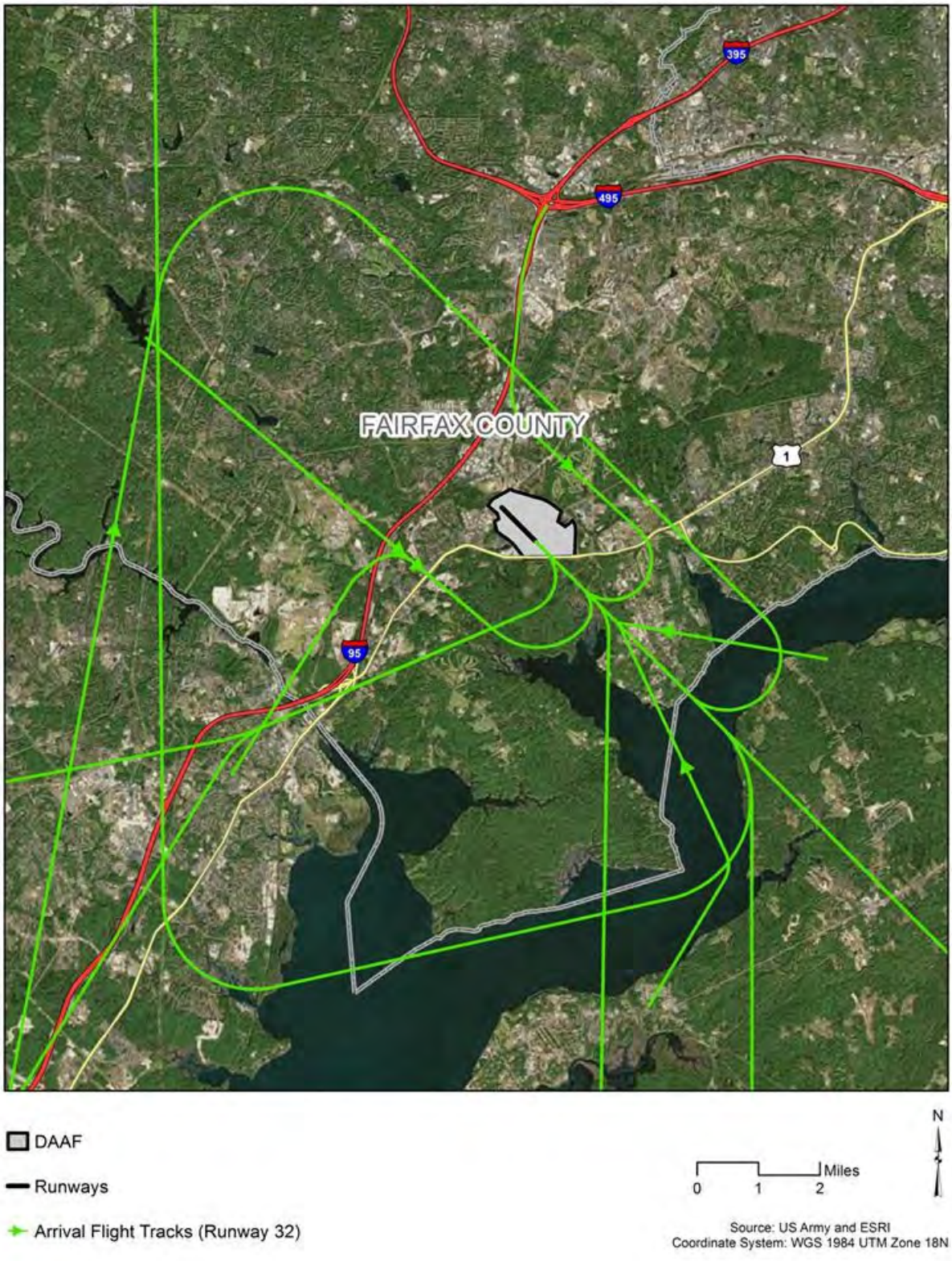


Figure 2a: Departure Flight Tracks – Runway 14



Figure 2b: Departure Flight Tracks – Runway 32



Figure 3: Helicopter Closed Pattern Flight Tracks



Table 2 shows the compiled annual aircraft flight operations. For the purposes of the model, the number of annual operations was then divided by 365 to determine the average annual-day operations to be used as model input.

Table 2: Flight Operations at DAAF (2017)

Unit	Aircraft	Departures	Arrivals	Closed Patterns	Total Annual Ops
12th Aviation Battalion	UH-60	5,000	5,000	18,750	28,750
Army National Guard	C-26	280	280	0	560
	UH-60 / UH-72	1,120	1,120	4,200	6,440
CAP	C-172 / C-182	617	617	0	1,234
NVESD	C-12 / DHC-6	104	104	0	208
	UH-60	52	52	0	104
OSA-A	C-12	1,040	1,040	0	2,080
	Cessna Citation	2,080	2,080	0	4,160
Transient	All	6,232	6,232	0	12,464
All Units	**All**	**16,525**	**16,525**	**22,950**	**56,000**

2.4.3 Operations Runway Distribution

Table 3 shows runway usage by a combination of aircraft type. Note that aircraft types in **Table 3** are not exactly the same as those shown in **Table 2** because several surrogate aircraft types were substituted as necessary to represent aircraft not in the NOISEMAP or AAM databases. Transient aircraft are also represented in **Table 3**.

Table 3: Runway Usage by Operation Types

Runway	Modeled Aircraft	Departure	Arrival	Closed Pattern	Notes
14	DHC-6, C-12, C-26, CIT3, CIII,UH-60, UH-1N, HH-53, Dauphin SA365N, Transient	21%	20%	20%	Fixed Wing and Helicopters
32	DHC-6, C-12, GASEPV VAR PTCH, C-26, CIT3, CIII,UH-60, UH-1N, HH-53, Dauphin SA365N, Transient	79%	80%	80%	Fixed Wing and Helicopters

2.4.4 Weather Data

The weather parameters used for the modeling are shown in **Table 4**.

Table 4: Weather Data

Month	Temperature (°F)	Humidity (%)	Pressure (Hg)
January	34.0	62	30.0113
February	36.5	60	29.9611
March	46.7	60	29.9877
April	56.8	61	29.9198
May	65.7	72	29.9404
June	73.9	72	29.8695
July	77.7	70	29.8932
August	75.6	74	29.9139
September	69.5	75	29.9818
October	57.7	76	29.9611
November	46.9	68	30.0527
December	40.3	70	30.0290

2.4.5 Engine Run-ups

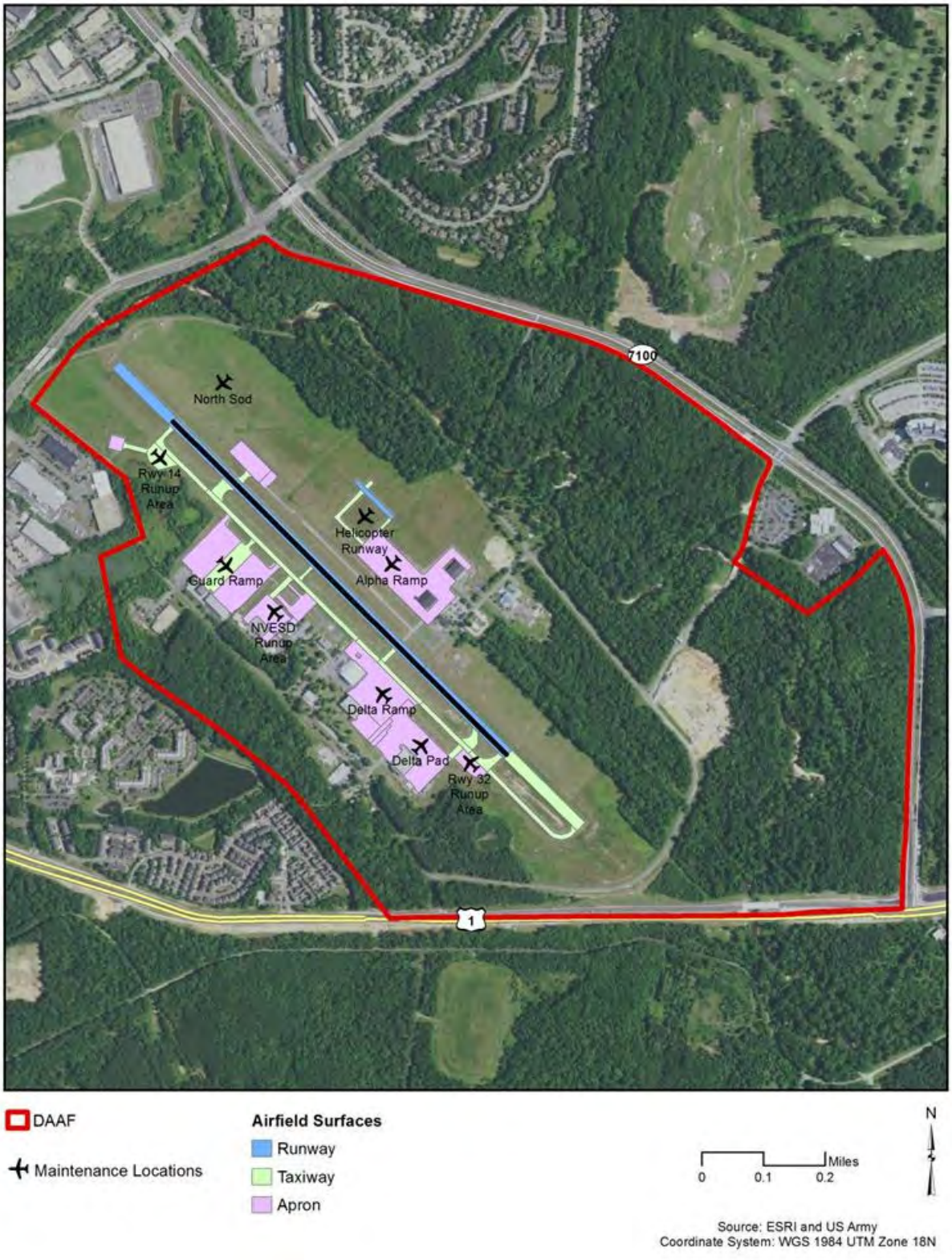
In addition to flight operations, pilots and maintenance personnel regularly conduct static engine run-ups as part of maintenance procedures or standard pre-flight/post-flight procedures. Noise from such run-up operations must be accounted for in the modeling. The parameters used to model run-up activities include the aircraft type, engine type, location, magnetic heading, the number of annual operations by acoustical day and night, power setting, and duration in minutes at each power setting.

A summary of the number of engine run-ups performed on an annual basis at DAAF is shown in **Table 5**. Run-up locations are depicted in **Figure 4**.

Table 5: Summary of Maintenance Run-up Operations

Unit	Aircraft Type	Run-up Type	Run-up Locations	Annual Frequency
12th Aviation Battalion	UH-60A	Pre-flight	North Sod	2,650
		Pre-flight	Helicopter Runway	650
		Pre-flight	Delta Ramp	1,700
		Maintenance	Delta Pad	750
		Maintenance	Delta Ramp	750
		Maintenance	12th Battalion UH-60 Maintenance Run-up Alpha Ramp	750
OSAA	C-12	Pre-flight	Delta Ramp	1,040
		High Power Maintenance	RY 14 Run-up Area	486
		High Power Maintenance	RY 32 Run-up Area	54
		Idle Maintenance	Delta Ramp	180
		Maintenance Certification	RY 14 Run-up Area	486
		Maintenance Certification	RY 32 Run-up Area	54
	C-21A	Pre-flight	Delta Ramp	2,080
		High Power Maintenance	RY 14 Run-up Area	486
		High Power Maintenance	RY 32 Run-up Area	54
		Idle Maintenance	Delta Ramp	180
		Maintenance Certification	RY 14 Run-up Area	486
		Maintenance Certification	RY 32 Run-up Area	54
NVDES	UH-60A	Pre-flight	Delta Ramp	52
		Flight Control Tests	Delta Pad	17
		Flight Control Tests	Delta Ramp	17
		Flight Control Tests	Alpha Ramp	9
	C-12	Pre-flight	NVESD Run-up Area	104
		High Power Maintenance	NVESD Run-up Area	78
		Idle Maintenance	NVESD Run-up Area	26
Army National Guard	C-12	Pre-flight	Guard Ramp	280
		High Power Maintenance	Guard Ramp	312
		Idle Maintenance	Guard Ramp	104
		Maintenance Certification	Guard Ramp	45
	UH-1B	Pre-flight	Guard Ramp	1,120
		High Power Maintenance	Guard Ramp	312
		Idle Maintenance	Guard Ramp	104
		Hover Check	Guard Ramp	18

Figure 4: Run-up Locations



3 Baseline (2017) Noise Contours

The 2017 noise contours for existing conditions were modeled using NOISEMAP/AAM BASEOPS Model (Version 7.363) based on the validated data summarized above. The effects of terrain on noise propagation were also taken into account. NMPlot (Version 4.969) was used to plot DNL in 5 dB increments, ranging from 60 dB DNL to 80 dB DNL. **Figure 5** shows the resulting contours. **Table 6** shows the on- and off-post land areas within each noise zone.

Table 6: Land Area within DAAF 2017 DNL Contours

Noise Zone	On-Post Acreage	Off-Post Acreage
LUPZ/Zone I (>60 and <65 DNL)	100.3	467.0
Zone II (65-75 DNL)	223.7	69.9
Zone III (> 75DNL)	22.2	0.0
Total	**346.1**	**536.9**

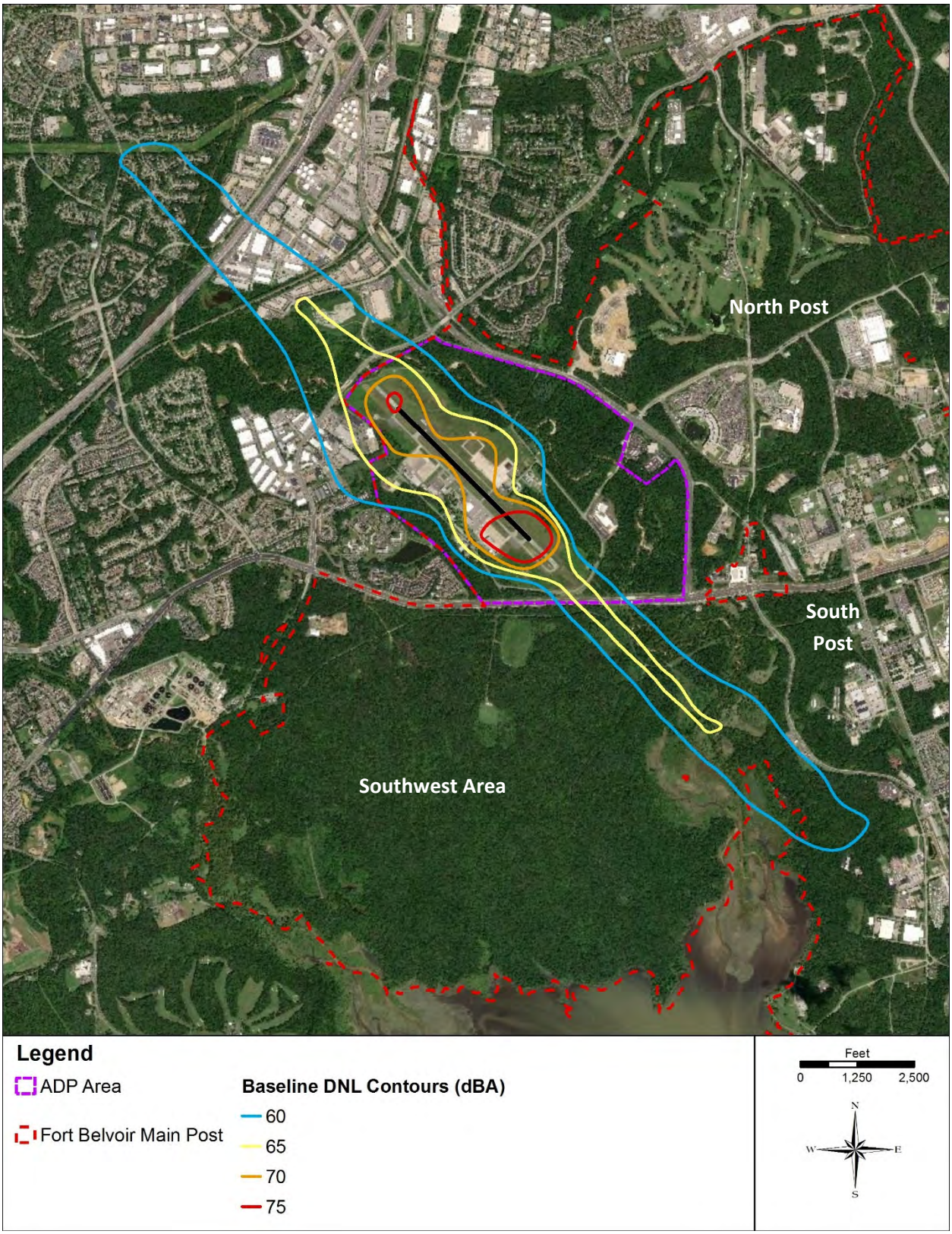
The contours generally align with the runways and the dominant flight tracks for arrivals, departures, and patterns. Departures and the descending portion of pattern operations require a higher power setting that generates greater noise and influences the shape of the contours.

The highest noise levels (Zone III) are entirely confined to the airfield. Zone II extends about half a mile past the northwestern and southeastern limits of the airfield. To the southeast, the contour extends over the Fort Belvoir Southwest Area; as shown on **Figure 5**, it encompasses no developed land in that direction. To the northwest, the tip of the 65-70 dB DNL contour overlaps with light industrial and commercial land uses between I-95 and Telegraph Road. Publicly available aerial imagery shows that there are no residential land uses within Zone II. No on- or off-post sensitive land uses are in an incompatible noise zone (see **Table 1**).

LUPZ/Zone I (60-65 dB) extends another 1 and 0.5 mile past the ends of Zone II to the southeast and northwest, respectively. As shown on **Figure 5**, to the southeast, it partially overlaps with Fort Belvoir's South Post but almost exclusively encompasses undeveloped land. To the northwest, Zone I encompasses light industrial and commercial uses along the east side of I-95 and in a neighborhood to the west of the interstate. To the southwest of DAAF, the 60-65-dB DNL contour overlaps several residences near the airfield's boundary.

Residential uses are generally compatible with Zone I DNL. Other than those noted above, no other residential uses are within the 60-dB DNL and higher contour.

Figure 5: DAAF 2017 DNL Contours



4 Future Condition Noise Contours

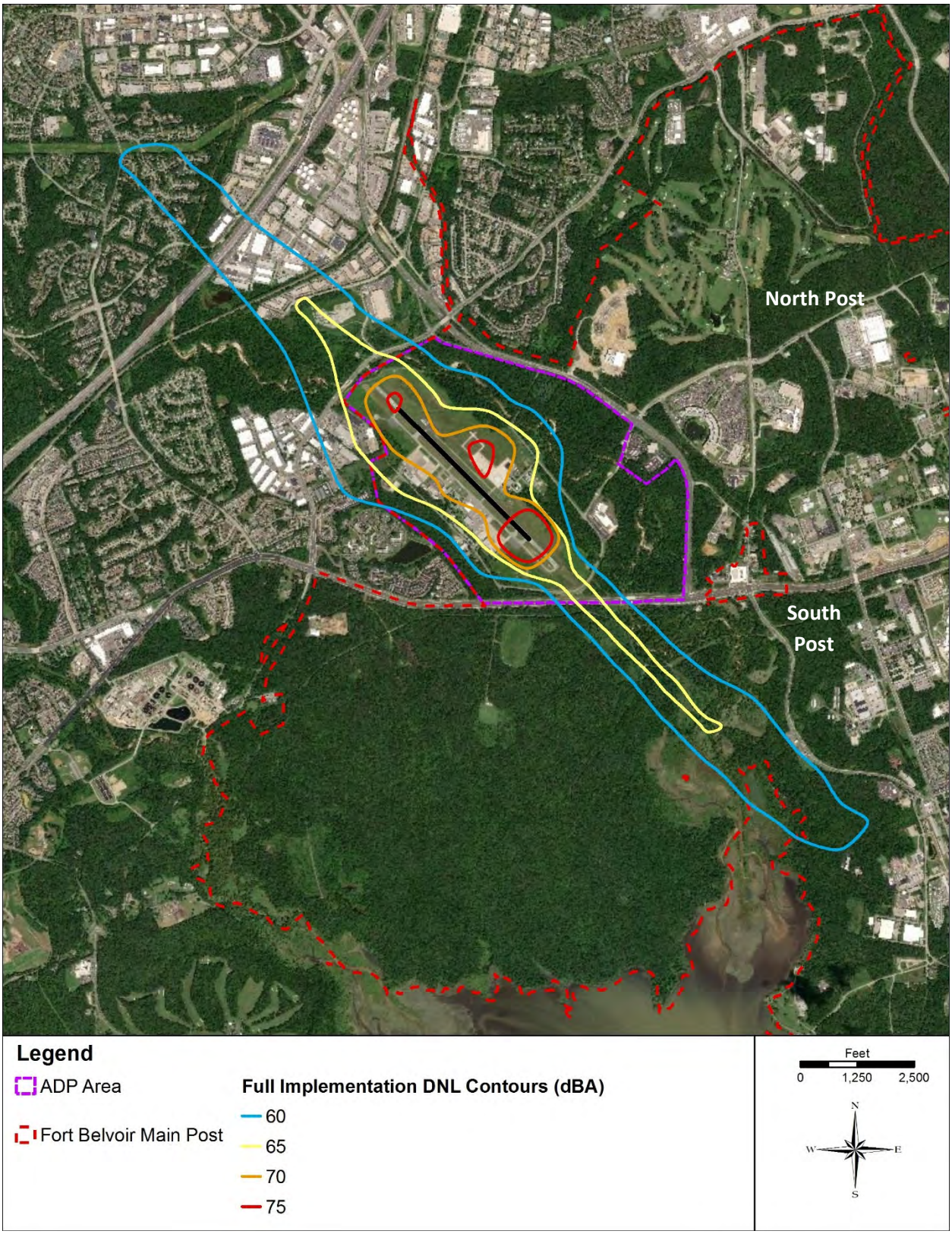
4.1 Full Implementation Alternative

Under the Full Implementation Alternative, aircraft flight operations would remain the same as the baseline (2017) conditions. However, some pre-flight and engine maintenance run-up locations, such as Delta Ramp and Delta Pad (**Figure 4**) utilized by OSA-A and NVESD, would be repositioned. Subsequently, the DNL contours under this alternative would be slightly different than the baseline conditions as shown on **Figure 6**. As a result of the new distribution of pre-flight and engine maintenance run-up operations, these contours were generated using the same NOISEMAP and AAM computer models used for predicting the baseline contours as shown in **Figure 5**. The DNL noise contours under the Full Implementation Alternative essentially remain the same as compared to the baseline condition. **Table 7** shows the on- and off-post land areas within each noise zone.

Table 7: Land Area within Full Implementation Alternative DNL Contours

Noise Zone	On-Post Acreage	Off-Post Acreage
LUPZ (>60 and <65 DNL)	126.2	466.1
Zone II (65-75 DNL)	239.6	71.0
Zone III (> 75DNL)	21.3	0.0
Total	**387.2**	**537.1**

Figure 6: Full Implementation Alternative DNL Contours



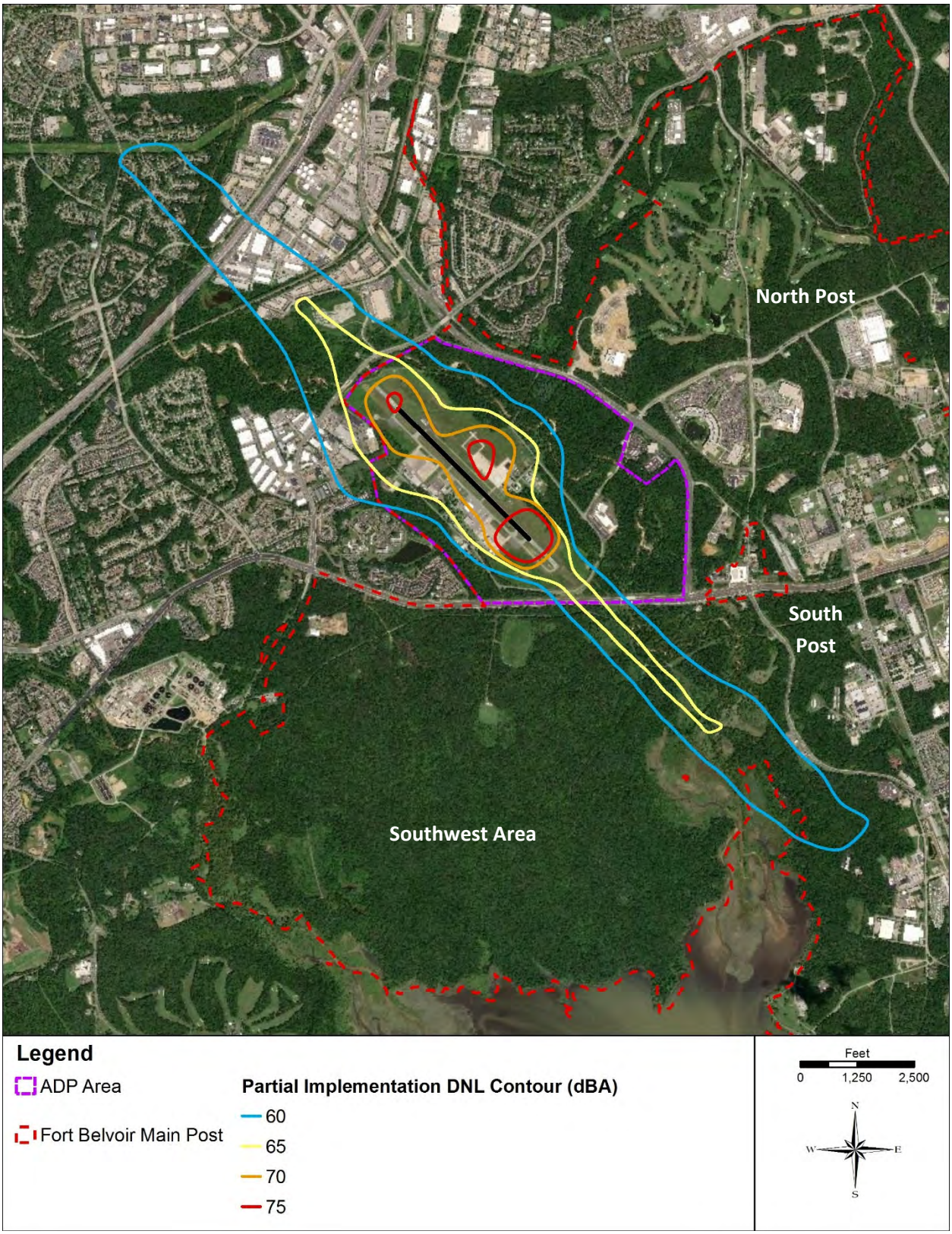
4.2 Partial Implementation Alternative

Under the Partial Implementation Alternative as compared to the Full Implementation Alternative, aircraft flight operations would remain the same; however, pre-flight and engine maintenance run-up locations for several flight units would either remain as the baseline condition or be relocated to different locations on the airfield. DNL contours under this alternative depicted on **Figure 7** are essentially the same as the Full Implementation Alternative, particularly for Zone II extending beyond DAAF's boundaries. The portion of Zone II that would potentially cover Fort Belvoir encompasses no sensitive land uses. **Table 8** shows the on- and off-post land areas within each noise zone.

Table 8: Land Area within Partial Implementation Alternative DNL Contours

Noise Zone	On-Post Acreage	Off-Post Acreage
LUPZ (>60 and <65 DNL)	122.4	465.7
Zone II (65-75 DNL)	238.2	71.4
Zone III (> 75DNL)	22.6	0.0
Total	**383.3**	**537.1**

Figure 7: Partial Implementation Alternative DNL Contours



5 Conclusion

Compared to the historical 2010 contours at DAAF, the updated 2017 baseline contours present both similarities and differences. With regard to the extent of Zone II, the updated contours generally compare with the 2010 contours. In 2017 as in 2010, no land use incompatibilities were identified. In particular, the number of residences within the 60 dB DNL contour is small in comparison to the portions of their corresponding neighborhoods that lie outside the 60 dB DNL contour.

In contrast to the 2010 study, which showed no DNL in excess of 75 dB DNL (ZONE III) this update shows some areas of the airfield within Zone III. This primarily results from including noise contributions from engine run-up operations. At the other end of the scale, the area within the 60 to 65 dB DNL contour in 2010 was substantially larger than that shown in the 2017 update. Those changes neither create nor eliminate any land use incompatibilities.

Since it is anticipated that aircraft flight operations under both Full and Partial Implementation alternatives would remain the same as the 2017 baseline conditions, noise contours essentially remain the same as compared to the 2017 baseline conditions, particularly those extending beyond the post. Differences in contours among the proposed alternatives as compared to the 2017 baseline conditions result from changes in pre-flight and/or engine run-up locations under each alternative. These changes neither create nor eliminate any land use incompatibilities. **Table 9** presents on- and off-post land area within each DNL contour for the Full and Partial Implementation Alternatives.

Table 9: Land Area Underlying DNL Contours: No Action, Full Implementation, and Partial Implementation

Noise Zone	On-Post Acreage			Off-Post Acreage		
	Existing	Full Implementation	Partial Implementation	Existing	Full Implementation	Partial Implementation
LUPZ (>60 and <65 DNL)	100.3	126.2	122.4	467.0	466.1	465.7
Zone II (65-75 DNL)	223.7	239.6	238.2	69.9	71.0	71.4
Zone III (> 75DNL)	22.2	21.3	22.6	0.0	0.0	0.0
Total	**346.1**	**387.2**	**383.3**	**536.9**	**537.1**	**537.1**

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Appendix C – DAAF Wetlands and Waters of the United States Delineation Report

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WETLANDS AND WATERS OF THE UNITED STATES DELINEATION REPORT FOR DAVISON ARMY AIR FIELD FORT BELVOIR, FAIRFAX COUNTY, VIRGINIA

September 2018

Prepared for:

United States Army Corps of Engineers
Baltimore District
10 South Howard Street
Baltimore, MD 21201

Prepared by:

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107 South Church Street
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ATTACHMENTS

Attachment 1 Wetland Determination Data Forms
Attachment 2 Photographs
Attachment 3 Desk Research: Topographic Map; Aerial Photo; Web Soil Survey; National Wetland Inventory (NWI) Map; Wetland Data Point Locations; Photograph Locations; Wetland Boundary Line
Attachment 4 List of Vegetation Observed
Attachment 5 Wetlands Boundary Map

I. INTRODUCTION

Freshwater wetlands in Virginia are regulated by the United States Army Corps of Engineers (USACE) subject to Section 401 and 404 of the Clean Water Act and the Virginia Department of Environmental Quality. Waters of the U.S. (WOUS) are regulated by the USACE subject to Section 10 of the Rivers and Harbors Act.

This report documents the delineation of Wetlands and (WOUS) at the Davison Army Air Force Base (DAAFB, project site). The delineation was conducted August 1 and 2, 2018 on parcel 1185 199 4881 395 , located on Fort Belvoir Military Reservation, identified as 5800 South Pole Road, Fort Belvoir, Fairfax County, Virginia. The property is owned by the United States Department of Defense as administered through the United States Office of General Services. The delineation was conducted by Avatar as part of a facility expansion planning and feasibility review for airfield support improvements. The delineation was conducted on an approximately 40 acre portion of the property that composes the project site.

The site was evaluated using the methods described in the *Corps of Engineers Wetlands Delineation Manual* (1987) and the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Atlantic and Gulf Coastal Plain Region* (Version 2.0, 2010). Site reconnaissance was recorded on USACE Regional Supplement-specific Routine Wetland Determination Data Forms (Attachment 1). Plant wetland status ratings were verified through the USACE Commonwealth of Virginia National Wetland Plant List 2012 Final Draft and Atlantic Gulf Coastal Plain Regional Plant List, 2016, Version 3.3 (USACE, http://wetland_plants.usace.army.mil/). Photographic documentation of the site is provided in Attachment 2.

II. IDENTIFICATION OF PROJECT SITE

The project site is located entirely on the Fort Belvoir Military Reservation property (Attachment 3) on Fairfax County parcel 1185 199 4881 395, accessed through 5800 Pole Rd., Fort Belvoir, Virginia. The site consists of approximately 40 acres of improved and wooded lands used for aviation mission support and buffer lands and lies southeastward of Interstate Route 95, and northward of US Route 1, South of Alexandria, Virginia.

The aviation support portion of the site contains numerous impervious surfaces (including roads, runways, parking, and aviation staging areas), and aviation mission support associated buildings including hangars, fueling, painting and control facilities. Areas surrounding the runways and support facilities were observed in various stages of periodic or seasonal mowing/maintenance. The buffer areas were observed to contain successional woodland and recreation areas.

This delineation identifies Wetlands and (WOUS) within the project site. The identified Wetlands and (WOUS) meet the Federal definition of Wetlands and (WOUS). Woodlands were observed to contain palustrine forested Wetlands and (WOUS).

Wetland areas are located within the Atlantic Gulf Coastal Plain Physiographic Province, Outer Coastal Plain (MLRA 149A) sub-province. Wetlands observed corresponded with wetland types identified in the U.S. Fish and Wildlife Service National Wetland Inventory for the site, that is, forested (PFO) and emergent (PEM) wetlands that are occasionally or seasonally flooded. Some palustrine forested wetlands are noted on the NWI to be partially drained and ditched; field observations support this annotation. The National Wetlands Inventory review of the project site is enclosed for reference as Attachment 3.

III. DELINEATION RATIONALE

The site was delineated using the criteria identified in the USACE's Wetlands Manual and associated regional guide for the Atlantic Coastal Plain (*Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Atlantic and Gulf Coastal Plain Region* [Version 2.0, 2010]). Assessment criteria for this site included hydrology, hydric soils, and vegetation.

Wetland delineators performed desktop research, followed by field assessments and determinations and documentation per the abovementioned USACE guidelines. Areas where assessment criteria were met were then delineated. Areas of perennial hydrology/streams were flagged when definable bed and bank, hydrology, and flow were observed.

Numerous soil samples were cored to determine termination of transition zones. Data were documented from the delineation assessment (Attachment 1).

Three wetlands were delineated during the assessment:

Wetlands	Approximate area	Wetland type
A	2.2 acres	PFO1E -- Freshwater Forested/Shrub Wetland
B	0.02 acres	PFO1E -- Freshwater Forested/Shrub Wetland
C	1.1 acres	PFO1A -- Freshwater Forested/Shrub Wetland
Total	3.32 acres	

IV. BACKGROUND INFORMATION

A. TOPOGRAPHY AND DRAINAGE

The U.S. Geological Survey (USGS) 7.5 Minute Quadrangle, Fort Belvoir, VA, dated 2014 (Attachment 3) was consulted as part of the desk review for this report. The project site generally slopes to the northeast, draining to Accotink

Creek. The improved portions of the site have been leveled, and the runway area is graded to maximize drainage. Maintained drainage areas slope to the southeast from 55 feet to 25 feet above sea level.

Evidence of wetland hydrology was observed across the site. Emergent wetland area hydrology was observed as depressional areas, well-defined drainage patterns, inundation on aerial imagery, and saturation. Palustrine forested wetland hydrology was most often observed by depressional areas, stained leaf litter, standing water, darkened soil, muck, buttressed tree trunks and moss trim lines, drift deposits, and detritus. Evidence of flow and bed and bank structures were observed at (WOUS)

B. VEGETATION

The National Wetlands Inventory (NWI) (Attachment 3) indicates palustrine forested deciduous seasonally or occasionally flooded wetlands, as well as herbaceous emergent wetlands on-site. Wetlands present were observed generally to confirm to these classifications, and exhibited wetland facultative or obligate vegetation.

Forested wetland areas were observed to have a generally facultative canopy, including Red maple (*Acer rubrum*, FAC), Pin oak, (*Quercus palustris*, FACW), and sycamore (*Platanus occidentalis*, FACW), transitioning to Green ash (*Fraxinus pennsylvanica*, FACW), Pignut hickory (*Carya glabra*, FACU), Sweet gum (*Liquidambar styraciflua*, FAC), Red oak (*Quercus falcata*, FACU), and Sassafras (Sassafras albidum, FACU) ornamentals or agriucultural remnants such as cherry (*Prunus* spp.). The vine layer was often characterized by catbriar (*Smilax glauca* FAC) and multiflora rose (*rosa multiflora,* FACU).

Please refer to Attachment 4 for a list of vegetation observed as part of the delineation.

C. SOILS

According to the *Soil Survey of Fairfax County, Virginia, (USGS online soil survey data version 13, 9/27/2016; aerial data 2015 and 2017)* (Figure 3, Attachment 3), the majority of the site is characterized by Codorus and Hatboro soils, Grist Mill sandy loam, other loams, and Urban land. Codorus and Elkton soils compose the majority of hydric soils, according to the soil survey. A full list of soils identified by the survey follow:

Unit Symbol	Map Unit Name
29A	Codorus silt loam, 0 to 2 percent slopes, occasionally flooded
30A	Codorus and Hatboro soils, 0 to 2 percent slopes, occasionally flooded
36A	Elkton silt loam, 0 to 2 percent slopes, occasionally ponded

40	Grist Mill sandy loam, 0 to 25 percent slopes
48A	Gunston silt loam, 0 to 2 percent slopes
49A	Hatboro silt loam, 0 to 2 percent slopes, frequently flooded
74B	Lunt-Marumsco complex, 2 to 7 percent slopes
77A	Mattapex loam, 0 to 2 percent slopes
77B	Mattapex loam, 2 to 7 percent slopes
90B	Sassafras sandy loam, 2 to 7 percent slopes
91C	Sassafras-Marumsco complex, 7 to 15 percent slopes
91D	Sassafras-Marumsco complex, 15 to 25 percent slopes
95	Urban land
109B	Woodstown sandy loam, 2 to 7 percent slopes

Soils were evaluated at the site using a hand-held auger or spade and reviewed against the Munsell Soil Color Book towards hydric determination. Soils observed at data determination points were recorded on the Routine Wetland Determination Data Form for the assessed areas. Numerous soil borings were performed throughout the field delineation. At least two borings were completed per each area assessed.

Sampling point locations recorded were considered representative of the wetland types observed at the project site.

V. CONCLUSION

The project site was evaluated for regulated Wetlands and (WOUS) as per the above mentioned criteria. Desk research and site assessment determined that Wetlands and (WOUS) are present on the project site. Most (WOUS) of the present were observed to extend beyond the project site. Wetland boundaries as determined in this delineation (WAAS accuracy) are shown in Attachment 5.

ATTACHMENT 1

WETLAND DETERMINATION DATA FORM – Atlantic and Gulf Coastal Plain Region

Project/Site: Davison Army Airfield / Fort Belvoir City/County: Fairfax Sampling Date: 08/02/2018

Applicant/Owner: Avatar Environmental / Fort Belvoir State: VA Sampling Point: WDP1

Investigator(s): Kurt Philipp, Dave Gosse Section, Township, Range: --

Landform (hillslope, terrace, etc.): _____ Local relief (concave, convex, none): N/A Slope (%): N/A

Subregion (LRR or MLRA): MLRA 149A Lat: 38°42'45.66"N Long: 77°11'0.58"W Datum: GE

Soil Map Unit Name: Lunt-Marumsco complex, 2 to 7 percent slopes NWI classification: PFO1E

Are climatic / hydrologic conditions on the site typical for this time of year? Yes X No _____ (If no, explain in Remarks.)

Are Vegetation N, Soil N, or Hydrology N significantly disturbed? Are "Normal Circumstances" present? Yes X No _____

Are Vegetation N, Soil N, or Hydrology N naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes X No _____	**Is the Sampled Area within a Wetland?** Yes X No _____
Hydric Soil Present?	Yes X No _____	
Wetland Hydrology Present?	Yes X No _____	

Remarks:

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one is required; check all that apply)

- ☐ Surface Water (A1)
- ☐ High Water Table (A2)
- ☐ Saturation (A3)
- ☐ Water Marks (B1)
- ☐ Sediment Deposits (B2)
- ☐ Drift Deposits (B3)
- ☐ Algal Mat or Crust (B4)
- ☐ Iron Deposits (B5)
- ☐ Inundation Visible on Aerial Imagery (B7)
- ☐ Water-Stained Leaves (B9)
- ☐ Aquatic Fauna (B13)
- ☐ Marl Deposits (B15) **(LRR U)**
- ☐ Hydrogen Sulfide Odor (C1)
- ☐ Oxidized Rhizospheres along Living Roots (C3)
- ☐ Presence of Reduced Iron (C4)
- ☐ Recent Iron Reduction in Tilled Soils (C6)
- ☐ Thin Muck Surface (C7)
- ☑ Other (Explain in Remarks)

Secondary Indicators (minimum of two required)

- ☐ Surface Soil Cracks (B6)
- ☑ Sparsely Vegetated Concave Surface (B8)
- ☐ Drainage Patterns (B10)
- ☑ Moss Trim Lines (B16)
- ☐ Dry-Season Water Table (C2)
- ☐ Crayfish Burrows (C8)
- ☐ Saturation Visible on Aerial Imagery (C9)
- ☑ Geomorphic Position (D2)
- ☐ Shallow Aquitard (D3)
- ☐ FAC-Neutral Test (D5)
- ☐ Sphagnum moss (D8) **(LRR T, U)**

Field Observations:

Surface Water Present?	Yes _____	No X	Depth (inches): N/A
Water Table Present?	Yes _____	No X	Depth (inches): not observed
Saturation Present? (includes capillary fringe)	Yes _____	No X	Depth (inches): _____

Wetland Hydrology Present? Yes X No _____

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:

In floodplain; observed shallow slope and sparsely vegetated depression.

VEGETATION (Four Strata) – Use scientific names of plants. Sampling Point: WDP1

Tree Stratum (Plot size: 30)	Absolute % Cover	Dominant Species?	Indicator Status
1. Quercus bicolor	5		FACW
2. Quercus stellata	5		UPL
3. Fagus grandifolia	15	Y	FACU
4. Nyssa aquatica	15	Y	OBL
5. Liquidambar styraciflua	15	Y	FAC
6. Quercus phellos	10		FACW
7. Pinus strobus	10		FACU
8.			
	70 = Total Cover		
50% of total cover: 35	20% of total cover: 14		
Sapling/Shrub Stratum (Plot size: 30)			
1. Betula populifolia	15	Y	FAC
2. Quercus bicolor	10		FACW
3. Nyssa aquatica	10		OBL
4. Fagus grandifolia	10		FACU
5. Carya aquatica	5		OBL
6. Sassafras albidum	15	Y	FACU
7. Cornus amomum	15	Y	FACW
8.			
	80 = Total Cover		
50% of total cover: 40	20% of total cover: 16		
Herb Stratum (Plot size: 30)			
1. Carya aquatica	5		OBL
2. Betula populifolia	5		FAC
3. Scirpus cyperinus	5		OBL
4. Cornus amomum	5		FACW
5. Fraxinus pennsylvanica	5		FACW
6. Carex lurida	5		OBL
7. Sassafras albidum	10	Y	FACU
8.			
9.			
10.			
11.			
12.			
	40 = Total Cover		
50% of total cover: 20	20% of total cover: 8		
Woody Vine Stratum (Plot size: 30)			
1. Smilax glauca	10		FAC
2. Parthenocissus quinquefolia	10		FACU
3.			
4.			
5.			
	20 = Total Cover		
50% of total cover: 10	20% of total cover: 4		

Dominance Test worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: _____ (A)

Total Number of Dominant Species Across All Strata: _____ (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: _____ (A/B)

Prevalence Index worksheet:

Total % Cover of:	Multiply by:
OBL species _____	x 1 = _____
FACW species _____	x 2 = _____
FAC species _____	x 3 = _____
FACU species _____	x 4 = _____
UPL species _____	x 5 = _____
Column Totals: _____ (A)	_____ (B)

Prevalence Index = B/A = _____

Hydrophytic Vegetation Indicators:

- [x] 1 - Rapid Test for Hydrophytic Vegetation
- [ ] 2 - Dominance Test is >50%
- [ ] 3 - Prevalence Index is ≤3.0[1]
- [ ] Problematic Hydrophytic Vegetation[1] (Explain)

[1]Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Definitions of Four Vegetation Strata:

Tree – Woody plants, excluding vines, 3 in. (7.6 cm) or more in diameter at breast height (DBH), regardless of height.

Sapling/Shrub – Woody plants, excluding vines, less than 3 in. DBH and greater than 3.28 ft (1 m) tall.

Herb – All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft tall.

Woody vine – All woody vines greater than 3.28 ft in height.

Hydrophytic Vegetation Present? **Yes** X **No** _____

Remarks: (If observed, list morphological adaptations below).

SOIL

Sampling Point: WDP1

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix Color (moist)	Matrix %	Redox Features Color (moist)	Redox Features %	Type[1]	Loc[2]	Texture	Remarks
0-5	10 YR 3/1	95	10 YR 4/6	5	C	M	fine loamy	very dark gray / dark yellow brown
5-10	10 YR 6/3	100			C	M		pale brown
10-16	10 YR 6/3	40	7.5 YR 4/1	40	RM	M		pale brown / dark gray
			5 YR 6/3	10	RM	M		light reddish brown
			10 YR 3/1	10	RM	M		very dark gray

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)

- ☐ Histosol (A1)
- ☐ Histic Epipedon (A2)
- ☐ Black Histic (A3)
- ☐ Hydrogen Sulfide (A4)
- ☐ Stratified Layers (A5)
- ☐ Organic Bodies (A6) **(LRR P, T, U)**
- ☐ 5 cm Mucky Mineral (A7) **(LRR P, T, U)**
- ☐ Muck Presence (A8) **(LRR U)**
- ☐ 1 cm Muck (A9) **(LRR P, T)**
- ☐ Depleted Below Dark Surface (A11)
- ☐ Thick Dark Surface (A12)
- ☐ Coast Prairie Redox (A16) **(MLRA 150A)**
- ☐ Sandy Mucky Mineral (S1) **(LRR O, S)**
- ☐ Sandy Gleyed Matrix (S4)
- ☐ Sandy Redox (S5)
- ☐ Stripped Matrix (S6)
- ☐ Dark Surface (S7) **(LRR P, S, T, U)**
- ☐ Polyvalue Below Surface (S8) **(LRR S, T, U)**
- ☐ Thin Dark Surface (S9) **(LRR S, T, U)**
- ☐ Loamy Mucky Mineral (F1) **(LRR O)**
- ☐ Loamy Gleyed Matrix (F2)
- ☑ Depleted Matrix (F3)
- ☐ Redox Dark Surface (F6)
- ☐ Depleted Dark Surface (F7)
- ☐ Redox Depressions (F8)
- ☐ Marl (F10) **(LRR U)**
- ☐ Depleted Ochric (F11) **(MLRA 151)**
- ☐ Iron-Manganese Masses (F12) **(LRR O, P, T)**
- ☐ Umbric Surface (F13) **(LRR P, T, U)**
- ☐ Delta Ochric (F17) **(MLRA 151)**
- ☐ Reduced Vertic (F18) **(MLRA 150A, 150B)**
- ☐ Piedmont Floodplain Soils (F19) **(MLRA 149A)**
- ☐ Anomalous Bright Loamy Soils (F20) **(MLRA 149A, 153C, 153D)**

Indicators for Problematic Hydric Soils[3]:

- ☐ 1 cm Muck (A9) **(LRR O)**
- ☐ 2 cm Muck (A10) **(LRR S)**
- ☐ Reduced Vertic (F18) **(outside MLRA 150A,B)**
- ☐ Piedmont Floodplain Soils (F19) **(LRR P, S, T)**
- ☐ Anomalous Bright Loamy Soils (F20) **(MLRA 153B)**
- ☐ Red Parent Material (TF2)
- ☐ Very Shallow Dark Surface (TF12)
- ☐ Other (Explain in Remarks)

[3]Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if observed):

Type: _____

Depth (inches): _____

Hydric Soil Present? **Yes** X **No** _____

Remarks:

Initial depth (0-5") satisfied F3 criteria of layer that has a depleted matrix with 60 % or more chroma of 2 or less and that has a minimum thickness of 2". starting less than 4 inches from the surface.

WETLAND DETERMINATION DATA FORM – Atlantic and Gulf Coastal Plain Region

Project/Site: Davison Army Airfield / Fort Belvoir City/County: Fairfax Sampling Date: 08/02/2018

Applicant/Owner: Avatar Environmental / Fort Belvoir State: VA Sampling Point: YDP2

Investigator(s): Kurt Philipp, Dave Gosse Section, Township, Range: --

Landform (hillslope, terrace, etc.): _____ Local relief (concave, convex, none): N/A Slope (%): N/A

Subregion (LRR or MLRA): MLRA 149A Lat: 38°42'52.54"N Long: 77°10'18.03"W Datum: GE

Soil Map Unit Name: Gunston silt loam, 0 to 2 percent slopes NWI classification: PFO1A

Are climatic / hydrologic conditions on the site typical for this time of year? Yes X No _____ (If no, explain in Remarks.)

Are Vegetation N, Soil N, or Hydrology N significantly disturbed? Are "Normal Circumstances" present? Yes X No _____

Are Vegetation N, Soil N, or Hydrology N naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes X No _____	**Is the Sampled Area within a Wetland?** Yes X No _____
Hydric Soil Present?	Yes X No _____	
Wetland Hydrology Present?	Yes X No _____	

Remarks:

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one is required; check all that apply)

- ☑ Surface Water (A1)
- ☐ High Water Table (A2)
- ☑ Saturation (A3)
- ☑ Water Marks (B1)
- ☐ Sediment Deposits (B2)
- ☑ Drift Deposits (B3)
- ☐ Algal Mat or Crust (B4)
- ☐ Iron Deposits (B5)
- ☐ Inundation Visible on Aerial Imagery (B7)
- ☑ Water-Stained Leaves (B9)
- ☐ Aquatic Fauna (B13)
- ☐ Marl Deposits (B15) **(LRR U)**
- ☐ Hydrogen Sulfide Odor (C1)
- ☐ Oxidized Rhizospheres along Living Roots (C3)
- ☑ Presence of Reduced Iron (C4)
- ☐ Recent Iron Reduction in Tilled Soils (C6)
- ☑ Thin Muck Surface (C7)
- ☐ Other (Explain in Remarks)

Secondary Indicators (minimum of two required)

- ☐ Surface Soil Cracks (B6)
- ☑ Sparsely Vegetated Concave Surface (B8)
- ☑ Drainage Patterns (B10)
- ☑ Moss Trim Lines (B16)
- ☐ Dry-Season Water Table (C2)
- ☐ Crayfish Burrows (C8)
- ☐ Saturation Visible on Aerial Imagery (C9)
- ☑ Geomorphic Position (D2)
- ☐ Shallow Aquitard (D3)
- ☐ FAC-Neutral Test (D5)
- ☐ Sphagnum moss (D8) **(LRR T, U)**

Field Observations:

Surface Water Present?	Yes _____	No X	Depth (inches): N/A
Water Table Present?	Yes _____	No X	Depth (inches): not observed
Saturation Present? (includes capillary fringe)	Yes Y	No _____	Depth (inches): 6

Wetland Hydrology Present? Yes X No _____

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:

VEGETATION (Four Strata) – Use scientific names of plants. Sampling Point: YDP2

Tree Stratum (Plot size: 30)	Absolute % Cover	Dominant Species?	Indicator Status
1. Acer rubrum	60	Y	FAC
2. Liquidambar styraciflua	30	Y	FACW
3. Quercus phellos	7	Y	FACW
4. Nyssa aquatica	2		OBL
5. Liriodendron tulipifera	1		FACU
6.			
7.			
8.			
	100	= Total Cover	
50% of total cover: 50	20% of total cover: 20		

Sapling/Shrub Stratum (Plot size: 30)			
1. Viburnum dentatum	15	Y	FAC
2. Liquidambar styraciflua	15	Y	FACW
3. Quercus bicolor	10		FACW
4. Quercus palustris	10		FACW
5. Carya aquatica	5		OBL
6. Acer rubrum	5		FAC
7. Betula populifolia	5		FAC
8. Lindera melissifolia	15		FACW
	75	= Total Cover	
50% of total cover: 37.5	20% of total cover: 15		

Herb Stratum (Plot size: 30)			
1. Vaccinium angustifolium	10		FACU
2. Vaccinium corymbosum	10		FACW
3. Microstegium vimineum	8		FAC
4. Echinochloa esculenta	8		FAC
5. Lonicera japonica	10		FACU
6. Rubus alumnus	2		FACU
7. Osmundastrum cinnamomeum	5		FACW
8. Dichanthelium clandestinum	5		FACW
9. Acer rubrum	15	Y	FAC
10. Nyssa aquatica	5		OBL
11. Arisaema triphyllum	5		FACW
12. Lycopus americanus	5		OBL
	88	= Total Cover	
50% of total cover: 44	20% of total cover: 17.6		

Woody Vine Stratum (Plot size: 30)			
1. Smilax glauca	2		FAC
2. Parthenocissus quinquefolia	5	Y	FACU
3. Celastrus orbiculatus	5	Y	FACU
4. rosa multiflora	2		FACU
5.			
	14	= Total Cover	
50% of total cover: 7	20% of total cover: 2.8		

Dominance Test worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: _____ (A)

Total Number of Dominant Species Across All Strata: _____ (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: _____ (A/B)

Prevalence Index worksheet:

Total % Cover of:	Multiply by:
OBL species _____	x 1 = _____
FACW species _____	x 2 = _____
FAC species _____	x 3 = _____
FACU species _____	x 4 = _____
UPL species _____	x 5 = _____
Column Totals: _____ (A)	_____ (B)

Prevalence Index = B/A = _____

Hydrophytic Vegetation Indicators:

- [x] 1 - Rapid Test for Hydrophytic Vegetation
- [ ] 2 - Dominance Test is >50%
- [ ] 3 - Prevalence Index is ≤3.0[1]
- [ ] Problematic Hydrophytic Vegetation[1] (Explain)

[1]Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Definitions of Four Vegetation Strata:

Tree – Woody plants, excluding vines, 3 in. (7.6 cm) or more in diameter at breast height (DBH), regardless of height.

Sapling/Shrub – Woody plants, excluding vines, less than 3 in. DBH and greater than 3.28 ft (1 m) tall.

Herb – All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft tall.

Woody vine – All woody vines greater than 3.28 ft in height.

Hydrophytic Vegetation Present? **Yes** X **No** _____

Remarks: (If observed, list morphological adaptations below).

SOIL Sampling Point: YDP2

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix Color (moist)	%	Redox Features Color (moist)	%	Type[1]	Loc[2]	Texture	Remarks
0-8	10 YR 4/2	40	10 YR 5/1	50	D	RM	clayey	dark gray brown / gray
			10 YR 4/6	10	C	RM	clayey	dark yellowish brown
8-16	10 YR 6/1	60	10 YR 4/1	20	D	RM	clayey	gray / dark gray
			10 YR 5/4	20	D	RM	clayey	yellowish brown

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)

- ☐ Histosol (A1)
- ☐ Histic Epipedon (A2)
- ☐ Black Histic (A3)
- ☐ Hydrogen Sulfide (A4)
- ☐ Stratified Layers (A5)
- ☐ Organic Bodies (A6) **(LRR P, T, U)**
- ☐ 5 cm Mucky Mineral (A7) **(LRR P, T, U)**
- ☑ Muck Presence (A8) **(LRR U)**
- ☑ 1 cm Muck (A9) **(LRR P, T)**
- ☑ Depleted Below Dark Surface (A11)
- ☐ Thick Dark Surface (A12)
- ☐ Coast Prairie Redox (A16) **(MLRA 150A)**
- ☐ Sandy Mucky Mineral (S1) **(LRR O, S)**
- ☐ Sandy Gleyed Matrix (S4)
- ☐ Sandy Redox (S5)
- ☐ Stripped Matrix (S6)
- ☐ Dark Surface (S7) **(LRR P, S, T, U)**
- ☐ Polyvalue Below Surface (S8) **(LRR S, T, U)**
- ☐ Thin Dark Surface (S9) **(LRR S, T, U)**
- ☐ Loamy Mucky Mineral (F1) **(LRR O)**
- ☐ Loamy Gleyed Matrix (F2)
- ☑ Depleted Matrix (F3)
- ☐ Redox Dark Surface (F6)
- ☑ Depleted Dark Surface (F7)
- ☐ Redox Depressions (F8)
- ☐ Marl (F10) **(LRR U)**
- ☐ Depleted Ochric (F11) **(MLRA 151)**
- ☐ Iron-Manganese Masses (F12) **(LRR O, P, T)**
- ☐ Umbric Surface (F13) **(LRR P, T, U)**
- ☐ Delta Ochric (F17) **(MLRA 151)**
- ☐ Reduced Vertic (F18) **(MLRA 150A, 150B)**
- ☐ Piedmont Floodplain Soils (F19) **(MLRA 149A)**
- ☐ Anomalous Bright Loamy Soils (F20) **(MLRA 149A, 153C, 153D)**

Indicators for Problematic Hydric Soils[3]:

- ☐ 1 cm Muck (A9) **(LRR O)**
- ☐ 2 cm Muck (A10) **(LRR S)**
- ☐ Reduced Vertic (F18) **(outside MLRA 150A,B)**
- ☐ Piedmont Floodplain Soils (F19) **(LRR P, S, T)**
- ☐ Anomalous Bright Loamy Soils (F20) **(MLRA 153B)**
- ☐ Red Parent Material (TF2)
- ☐ Very Shallow Dark Surface (TF12)
- ☐ Other (Explain in Remarks)

[3]Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if observed):

Type: _____

Depth (inches): _____

Hydric Soil Present? **Yes** X **No** _____

Remarks:

ATTACHMENT 2


Photo 1


Photo 2


Photo 3


Photo 4



Photo 5



Photo 6



Photo 7



Photo 8



Photo 9



Photo 10



Photo 11



Photo 12



Photo 13



Photo 14

ATTACHMENT 3

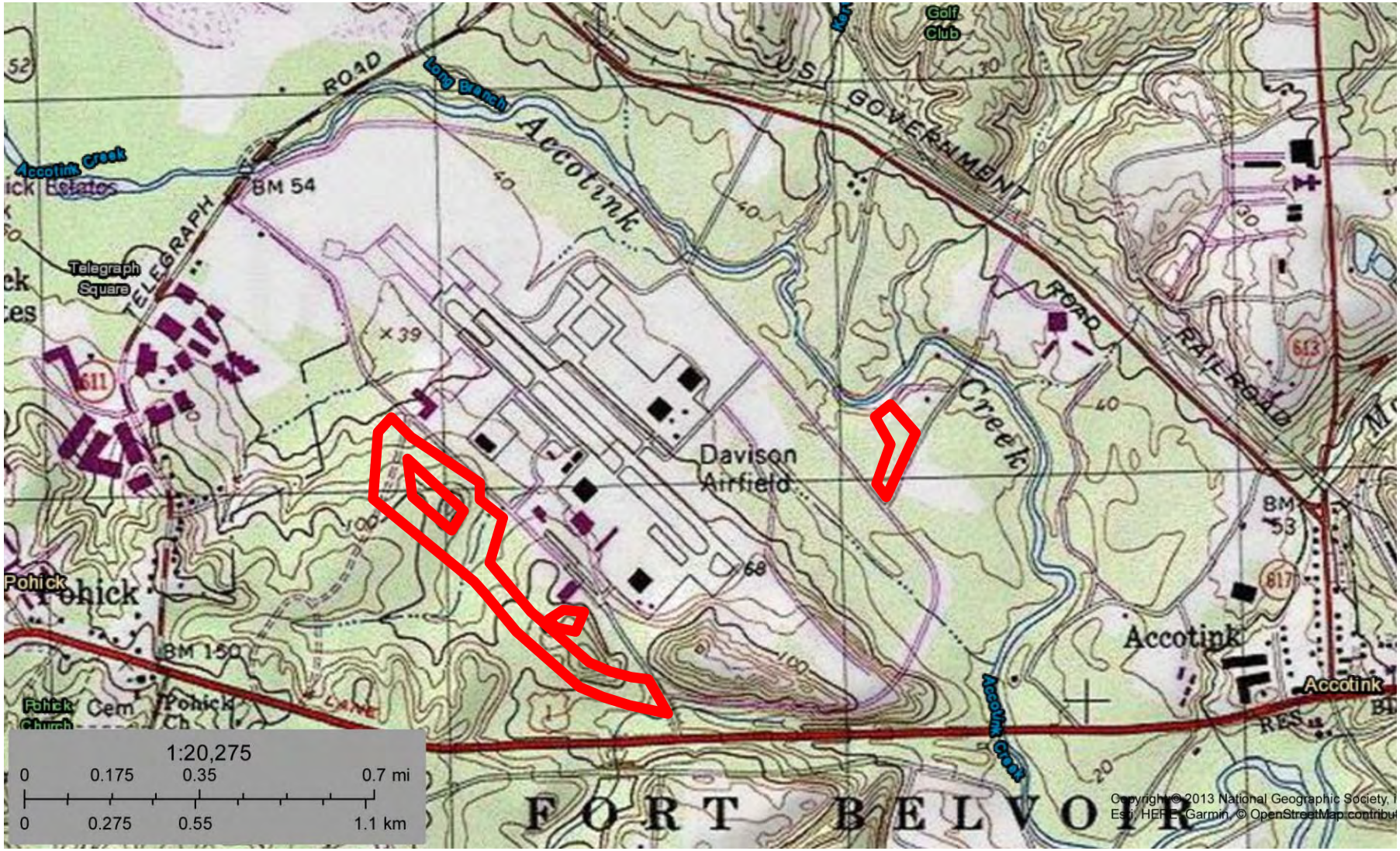


Figure 1 Site location - USGS Topographic Quadrangle

Wetlands Research Services

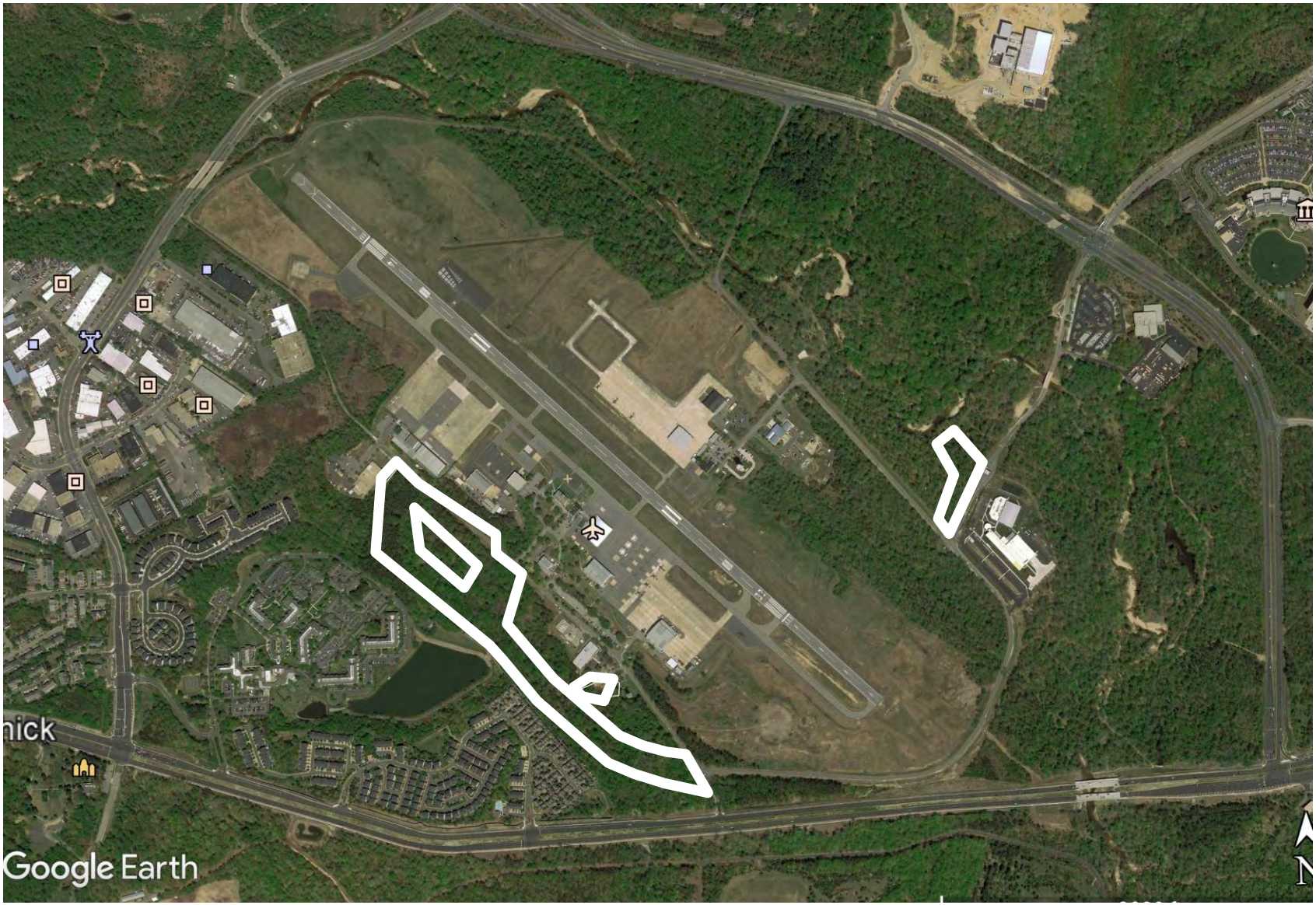


Figure 2 Aerial Photo

Wetlands Research Services

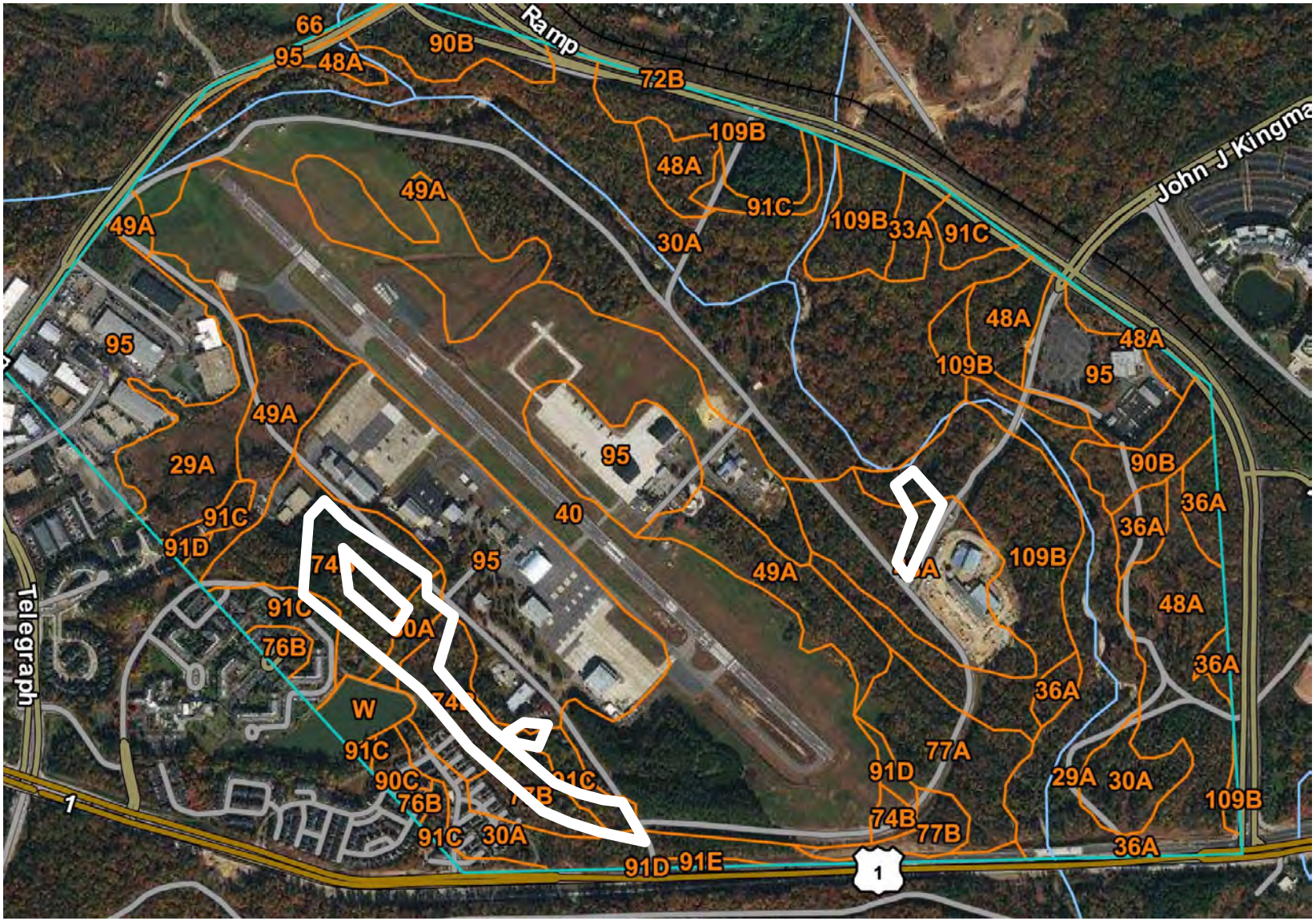


Figure 3 Web Soil Survey

Wetlands Research Services

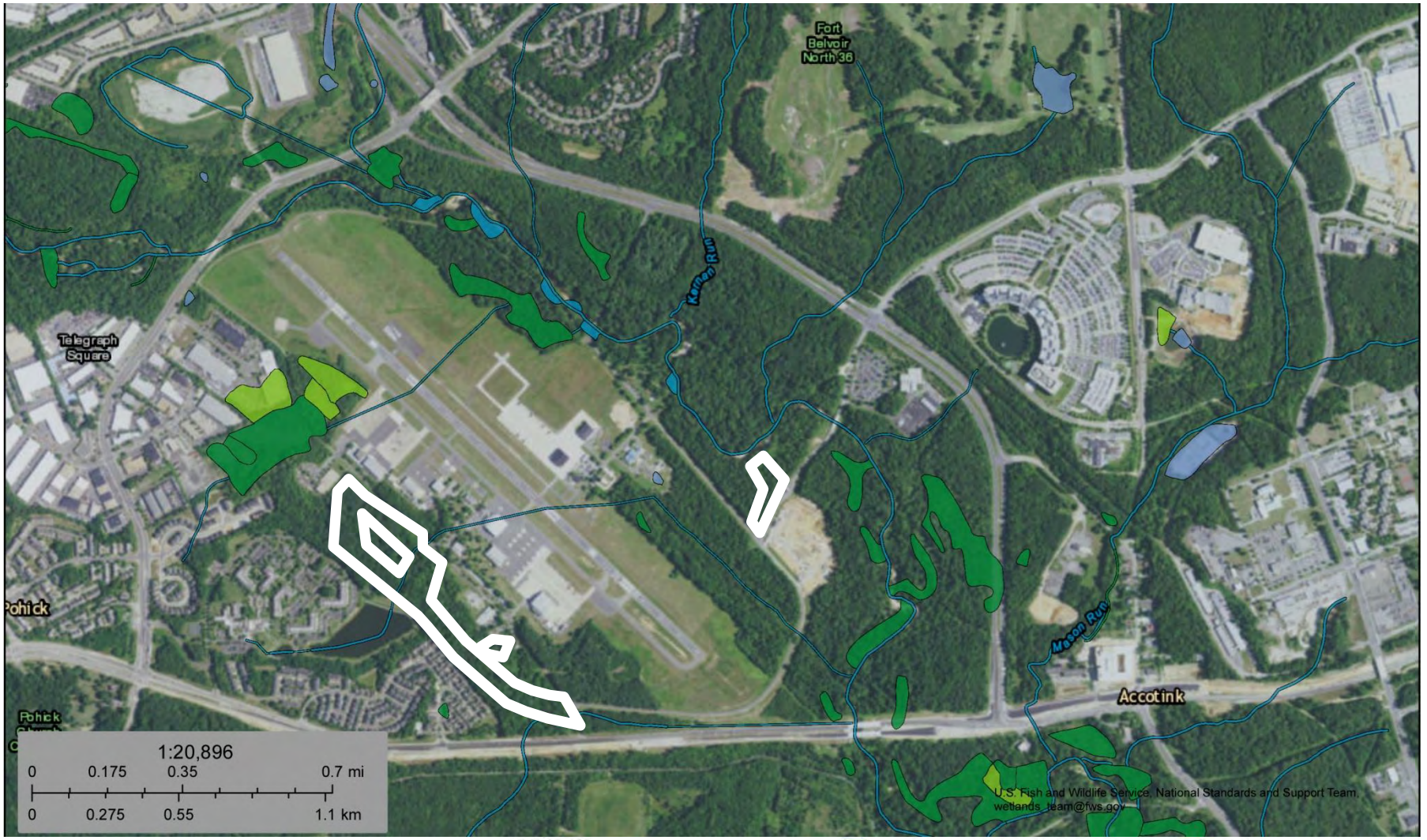


Figure 4 National Wetland Inventory (NWI) Map

Wetlands Research Services

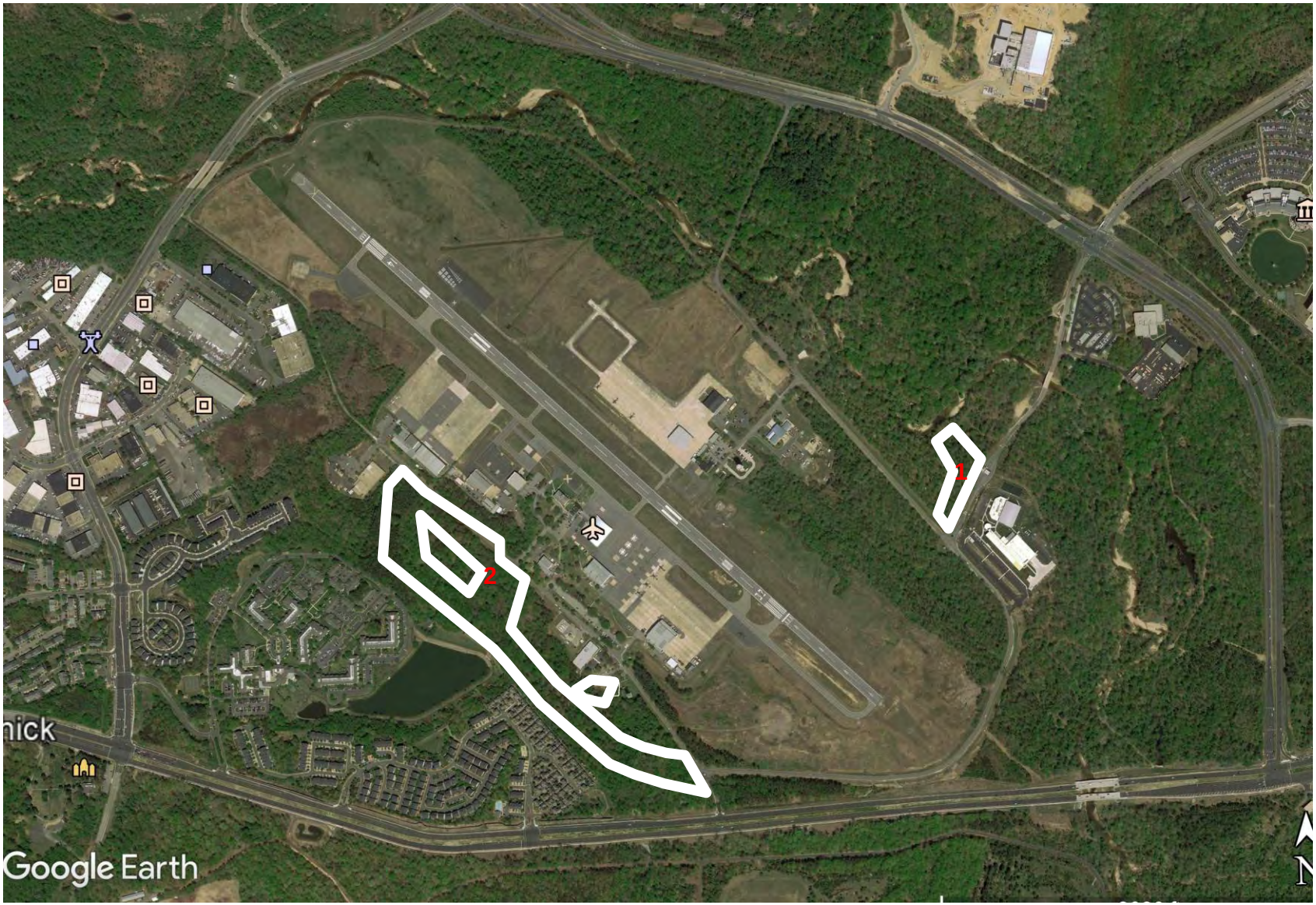


Figure 5 Wetland Data Point Locations

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Figure 6 Photograph Locations

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ATTACHMENT 4

Trees

Acer rubrum	(Red maple, FAC)
Acer saccharinum	(Silver maple, FAC)
Carya ovate	(Shagbark hickory FACU)
Carya glabra	(Pignut hickory, FACU)
Fagus grandifolia	(American beech) FACU
Fraxinus pennsylvanica,	(Green ash, FACW
Liquidambar styraciflua	(Sweet-gum, FAC)
Lirodendron tulipifera	(Tuliptree FACU)
Nyssa aquatica	(Black gum, FAC)
Photinia pyrifolia	(Red chokeberry, FACW)
Platanus occidentalis,	(Sycamore, FACW)
Pinus strobes	(Eastern white pine FACU)
Pinus taeda	(Loblolly pine, FAC)
Prunus virginiana	(Choke cherry, FACU)
Quercus bicolor	(Swamp white oak FACW)
Quercus falcata	(Red oak, FACU)
Quercus palustris	(Pin oak, FACW)
Quercus phellos	(Willow oak, FACW)
Quercus stellata	(Post oak, UPL)
Sassafras albidum	(Sassafras, FACU)
Viburnum dentatum	(Southern arrow wood, FAC)

Saplings/Shrubs

Betula populifolia	(Gray birch, FAC)
Carya aquatica	(Water hickory OBL)
Cephalanthus occidentalis	(Common buttonbush, OBL)
Cornus amomum	(Silky dogwood, FACW)
Elaeagnus angustifolia	(Russian olive, FACU)
Fagus grandifolia	(American beech, FACU)
Lonicera japonica	(Japanese honeysuckle, FACU)
Nyssa aquatica	(Black gum, OBL)
Prunus spp.	(cherry, FACU)
Pyrus spp.	(pear, FACU)
Quercus bicolor	(Swamp white oak FACW)
Sassafras albidum	(Sassafras,FACU)
Viburnum dentatum	(Southern arrow wood, FAC)

Herbaceous plants

Allium canadense	(Meadow garlic, FACU)
Asarum canadense	(wild ginger, FACU)
Bidens aristosa	(Beggarticks, FACW)
Cardamine pensylvanica	(Pennsylvania bittercress, FACW)
Carex lurida,	(Shallow sedge, OBL)

Dichanthelium scoparium	(Broom grass, FACW).
dichanthelium spp.	(Panicle grass spp., FAC-UPL)
digitaria spp.	(Crabgrass UPL)
Echinochloa crus-galli	(Barnyard grass FACW)
Eleocharis acicularis	(spike rush, OBL)
Eutrochium purpureum	(Joe-pye weed, FAC)
Fescue spp.	(commercial grass; fescue, FACU)
Hibiscus grandiflorus	(Hibiscus marsh-mallow, OBL)
Juncus effuses	(Soft rush, OBL)
Juncus tenuis,	(Poverty rush, FAC)
Ludwigia repens	(Creeping primrose-willow OBL)
Microstegium vimineum	(Japanese stiltgrass, FAC)
Muhlenbergia spp.	Muhly grass, FACW
Muhlenbergia capillaries	Hair-awn muhly grass, FAC)
Panicum virgatum	(Switchgrass, FAC)
Persicaria arifolia,	(Tearthumb, OBL)
Persicaria sagittata	(Tearthumb, OBL)
Phragmites australis	(Common reed FACW)
Rhynchospora microcephala	(Beaked sedge, FACW)
Scirpus atrovirens,	(Bulrush, OBL)
Scirpus cyperinus,	(Woolgrass, OBL)
Setaria pumila,	(Foxtail, FAC)
Solidago canadensis	(Canadian goldenrod, FACU)
Solidago gigantean,	(Giant goldenrod, FACW)
Taraxacum officinale	(Common dandelion, FACU)
Vernonia noveboracensis,	(Ironweed, FACW)

Vines

Lonicera japonica	(Japanese honeysuckle, FAC)
Rosa multiflora	(multifloral rose, UPL)
Rubus arvensis	(Blackberry, FAC)
Smilax glauca	(catbriar, FAC)

ATTACHMENT 5



Figure 7 Wetland Boundary Line

Wetlands Research Services

Appendix D – DAAF ADP Floodplain Impact Analysis

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1 INTRODUCTION

1.1 BACKGROUND AND STUDY PURPOSE

This study was completed by the Planning Division of the U.S. Army Corps of Engineers (USACE), Baltimore District. The purpose of this study was to determine the impacts that future development on the Davison Army Airfield (DAAF) would have on the 1-percent annual chance floodplain, often referred to as the 100-year floodplain. This development is a part of the Area Development Plan (ADP) for Fort Belvoir and this floodplain study is a component of the Environmental Impact Statement (EIS) that is being completed for the ADP.

The proposed action is to implement projects in the DAAF ADP. The projects include the construction of several new buildings, primarily aircraft hangars and aircraft maintenance facilities; renovation and/or expansion of selected hangars, maintenance facilities, and office/administrative buildings; demolition of several older buildings; and infrastructure improvement projects, such as realignment of the airfield perimeter road, construction of a new main entry gate, and expansion of aircraft parking aprons. These projects are intended to better support ongoing and future missions of DAAF's tenants and would be implemented over the next 30 years.

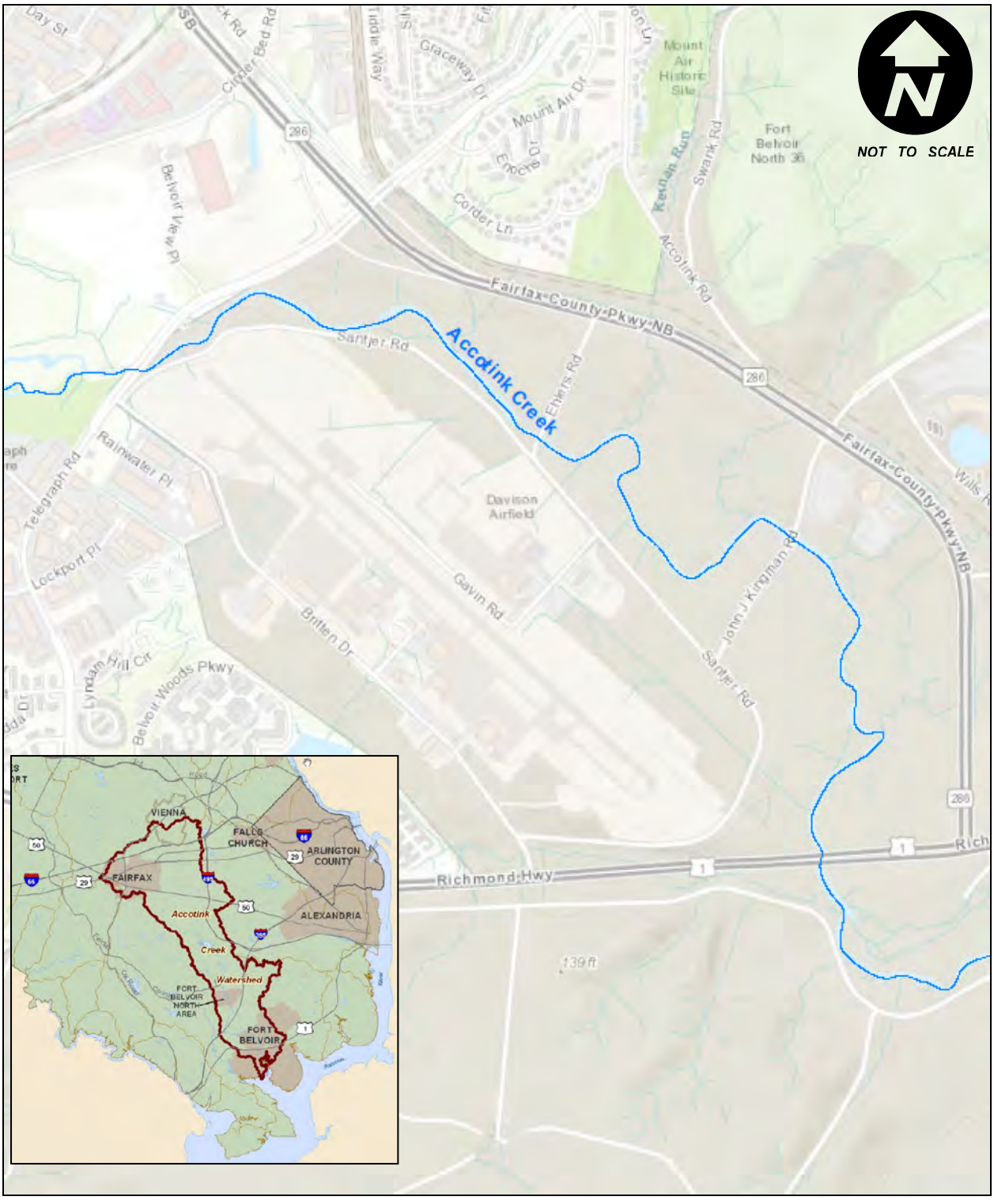
Executive Order 11988 (May 24, 1977, 42 FR 26971, 3 CFR, 1977 Comp., p. 117) requires that development on Federal lands are to avoid to the extent possible the long- and short-term adverse impacts associated with the occupancy and modification of floodplains. Section 2 of the Executive Order states that each agency has a responsibility to evaluate the potential effects of any actions it may take in a floodplain; to ensure that its planning programs and budget requests reflect consideration of flood hazards and floodplain management; and to prescribe procedures to implement the policies and requirements of the Order. Before taking an action, each agency shall determine whether the proposed action will occur in a floodplain. This determination shall be made according to a Department of Housing and Urban Development (HUD) floodplain map, Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) or a more detailed map of an area, if available. If such maps are not available, the agency shall make a determination of the location of the floodplain based on the best available information.

This document discusses the determination of the existing-conditions 1-percent annual chance floodplain for Accotink Creek located on DAAF and the potential impacts of the proposed action to the 1-percent annual chance floodplain.

1.2 STUDY AREA

DAAF is located on Fort Belvoir's North Post and is operated by the U.S. Army Military District Washington (MDW). A significant amount of land area on DAAF is located in the low-lying floodplain of Accotink Creek (**Figure 1.1**).

Figure 1.1: Study Area

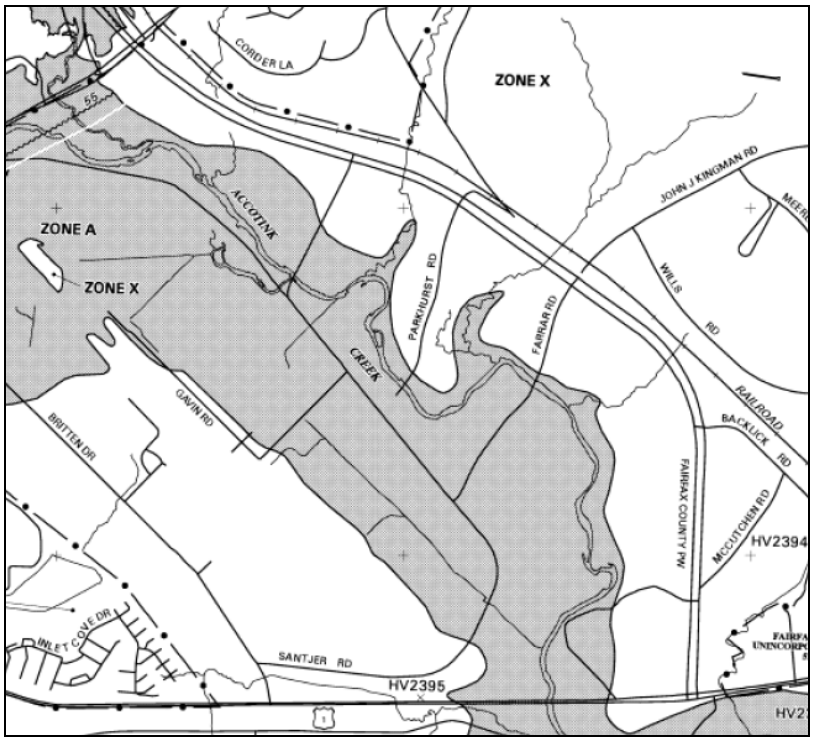


Based upon the *Accotink Creek Watershed Management Plan*, completed by the Fairfax County Department of Public Works and Environmental Services (DPWES), the Accotink Creek watershed is approximately 52 square miles and is the second largest watershed in Fairfax County, Virginia. It is a long, narrow watershed in the center of the county and drains to the Potomac River. The portion of Accotink Creek on DAAF spans approximately 2.3 miles from U.S. Route 1 (Richmond Highway) upstream to Telegraph Road.

1.3 OTHER STUDIES

The effective FEMA Flood Insurance Study (FIS) for Fairfax County, Virginia, is dated September 17, 2010 (**Figure 1.2**). In that study, the floodplain associated with Accotink Creek within DAAF is delineated as a Zone A. This means that the floodplain delineation is based upon approximate analyses. Through discussion with FEMA in December 2018, a restudy is underway that will impact the Accotink Creek floodplain. The FEMA RiskMap project for the Middle Potomac-Anacostia Basin-Wise Study, FEMA Case No. 14-03-3327S, is currently being completed, and when complete, will update the 1-percent annual chance floodplain for Accotink Creek as well as the FIS for Fairfax County, Virginia. The floodplain will become a Zone AE, which is a floodplain that is based upon a detailed analysis. Based upon the timeline of both the study detailed in this document, and the FEMA study, USACE and FEMA agreed that FEMA will provide flow input values for the USACE analysis, and once complete, USACE will provide FEMA with all hydraulic modeling and floodplain mapping. This will ensure that the existing-conditions analysis completed in this investigation will be what is shown on the FEMA FIRMs in the future.

Figure 1.2: Effective FEMA FIRM at DAAF

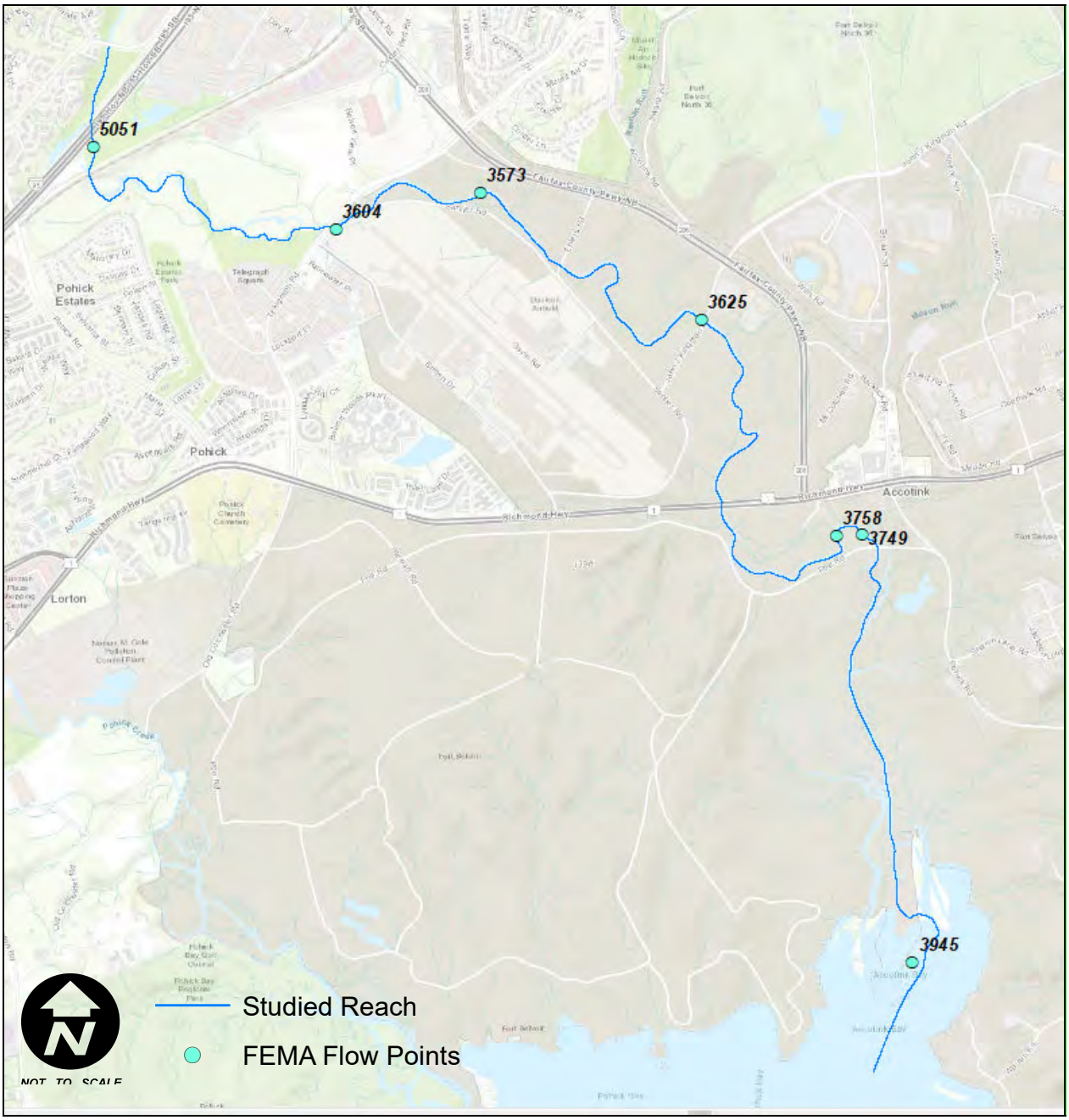


Another study that was used for the current investigation was completed by Urban in 2014 for the Belvoir Business Center near Telegraph Road. This flood study was completed to demonstrate that the grading associated with the Belvoir Business Center has minimal to no impact on 1-percent annual chance flood elevations.

2 EXISTING-CONDITIONS HYDROLOGY

As discussed in **Section 1.3**, hydrologic computations were completed by FEMA to determine peak flows for the 10-percent annual chance (10-year), 4-percent (25-year), 2-percent (50-year), 1-percent (100-year), 1-percent Plus (100-year Plus), and 0.2-percent (500-year) chance floods. A total of seven flow points were identified along Accotink Creek where peak flow values were required (**Figure 2.1**).

Figure 2.1: Flow Point Locations



Peak flows were computed by FEMA using the United States Geological Survey (USGS) *Methods and Equations for Estimating Peak Stream Flow per square mile in Virginia's Urban Basins, Scientific Investigations Report 2014-5090*. The preparers of that publication used statistical analysis of gaged flow rates and drainage areas for urban watersheds in Virginia to determine equations that could be used to estimate peak flow rates for similar, ungaged streams. The results of the FEMA hydrologic computations utilizing the regression equations is shown in **Table 2.1**. These values were used for the existing-conditions hydraulic modeling discussed in **Section 3** of this report.

Table 2.1: Summary of Discharges for Accotink Creek

FEMA Flow Point	Location	Drainage Area (sq. mi)	Annual Chance Storm					
			10%	4%	2%	1%	1%-Plus	0.20%
5051	Downstream of Railroad	39.9	5375	8044	9917	12696	17521	32378
3604	At Telegraph Road	40.6	5423	8121	10011	12813	17682	32702
3573	Downstream of confluence of Long Branch	45.7	5837	8779	10800	13819	19070	35923
3625	At Farrar Road	47.3	5944	8950	11010	14082	19433	36673
3758	At Richmond Highway	48.9	6023	9077	11170	14276	19701	37088
3749	At Poe Road	50.1	6097	9196	11315	14458	19978	37602
3945	At confluence with Potomac River	52.2	6191	9347	11510	14691	20424	38009

3 EXISTING-CONDITIONS HYDRAULIC ANALYSIS

The USACE HEC-RAS (River Analysis System), version 5.0.5, was used to develop a geo-referenced hydraulic model for Accotink Creek to calculate flood elevations for the 10-percent annual chance (10-year), 4-percent (25-year),2-percent (50-year), 1-percent (100-year), 1-percent Plus (100-year Plus), and 0.2-percent (500-year) chance floods. HEC-RAS is software that performs one-dimensional steady and unsteady state river flow hydraulic calculations. It is an integrated system of software designed for interactive use for a multi-tasking environment. The system is comprised of a graphical user interface, separate analysis components, data storage and management capabilities, graphics and reporting facilities (USACE, 2016). It is widely used and is an approved model for use in FEMA FIS's and floodplain mapping. The HEC-GeoRAS pre- and post-processor utilities were used to assist in the development of cross-sections and the mapping of the floodplain. All elevations in the modeling and mapping are referenced to the North American Vertical Datum of 1988 (NAVD88) with a horizontal coordinate system of NAD1983 State Plane Virginia North FIPS 4501 Feet.

All hydraulic modeling was completed to comply with FEMA's guidance documents and standards, as this modeling will be provided to FEMA for use in the upcoming restudy of the FIS for Fairfax County, Virginia.

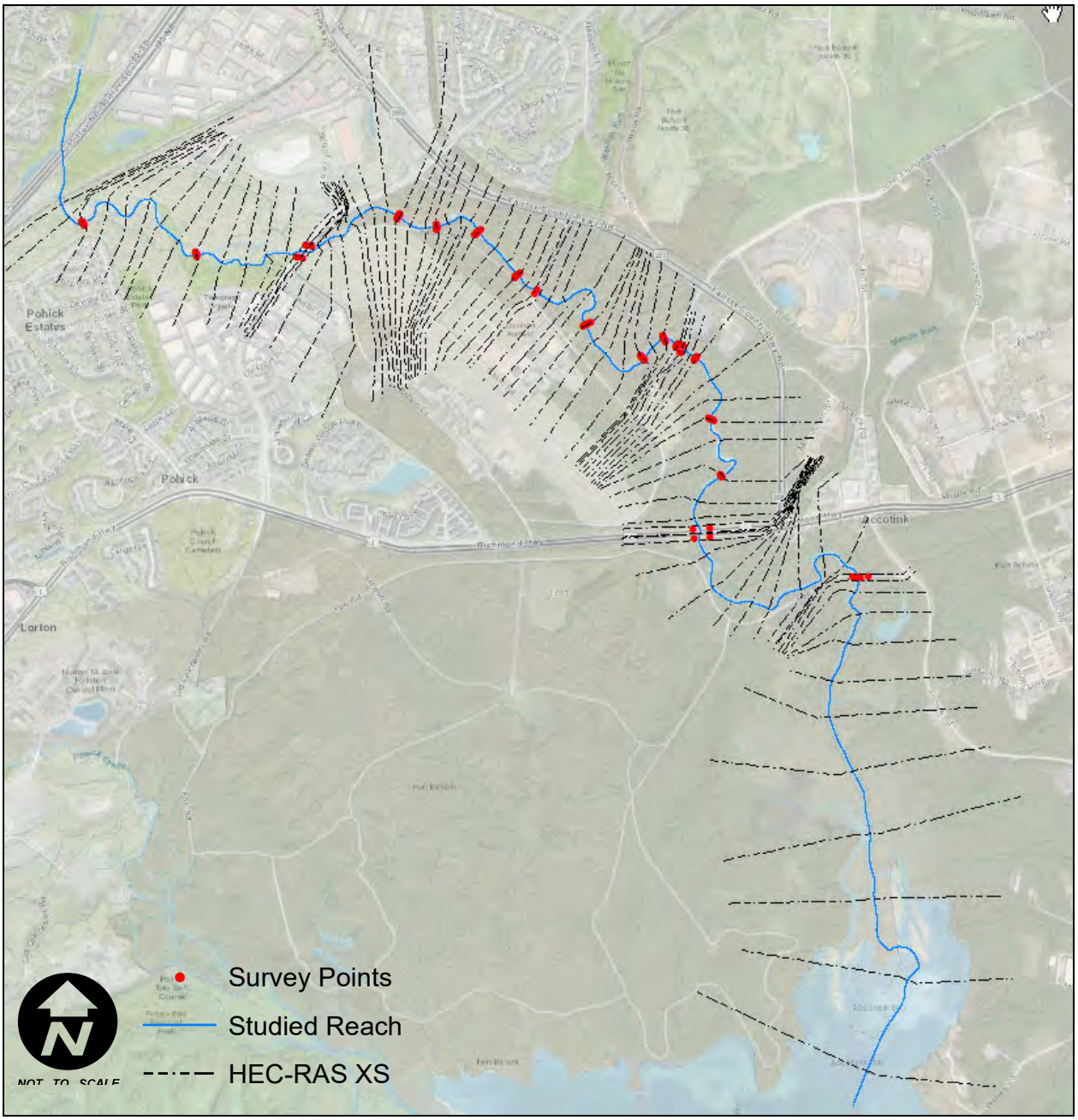
3.1 EXISTING-CONDITIONS HEC-RAS MODEL

An Existing-Conditions HEC-RAS model was developed to determine flood elevations along Accotink Creek at the time of this study and to be used as a baseline to determine the impacts of the proposed actions associated with the DAAF ADP. Peak flow data provided by FEMA (discussed in **Section 2** of this report) were input into HEC-RAS, and a steady state computation was completed for Accotink Creek for approximately 5.9 miles of stream from the confluence of the Potomac River upstream to just downstream of a railroad near Interstate 95 (I-95).

Topographic Data

The HEC-GeoRAS pre-processor was used to develop cross-sections for this study. The overbank portions of the cross-sections are from a 1-meter resolution digital elevation model (DEM) provided by Ft. Belvoir. The "wet sections" of the cross-sections were input based upon a channel field survey completed by USACE in December 2018 (**Figure 3.1**). The survey utilized relative positioning techniques yielding precision on the order of < 2 centimeters horizontally and vertically. More specifically, Real-Time Kinematic (RTK) Global Positioning System (GPS) techniques were used. The Trimble R8 GNSS (Global Navigation Satellite System) unit was utilized to perform the field survey.

Figure 3.1: USACE December 2018 Survey Points



A total of 25 channel cross-sections were taken within the study reach (includes internal bridge sections). For tidal areas downstream of Poe Road, channel depths were obtained from the *National Oceanic and Atmospheric Administration (NOAA) Soundings Chart 12289, Potomac River Mattawoman Creek to Georgetown*. For intermediate cross-sections between surveyed sections, the channel dimensions were interpolated. The source of channel data for each cross-section is listed in the description box in the geometric data editor. The HEC-RAS model has cross-sections that have river stations generated by the HEC-GeoRAS

program. The station identifier is the stream distance in feet upstream of the confluence with the Potomac River. The HEC-RAS cross-section layout is shown in **Figure 3.1**.

Road Crossings

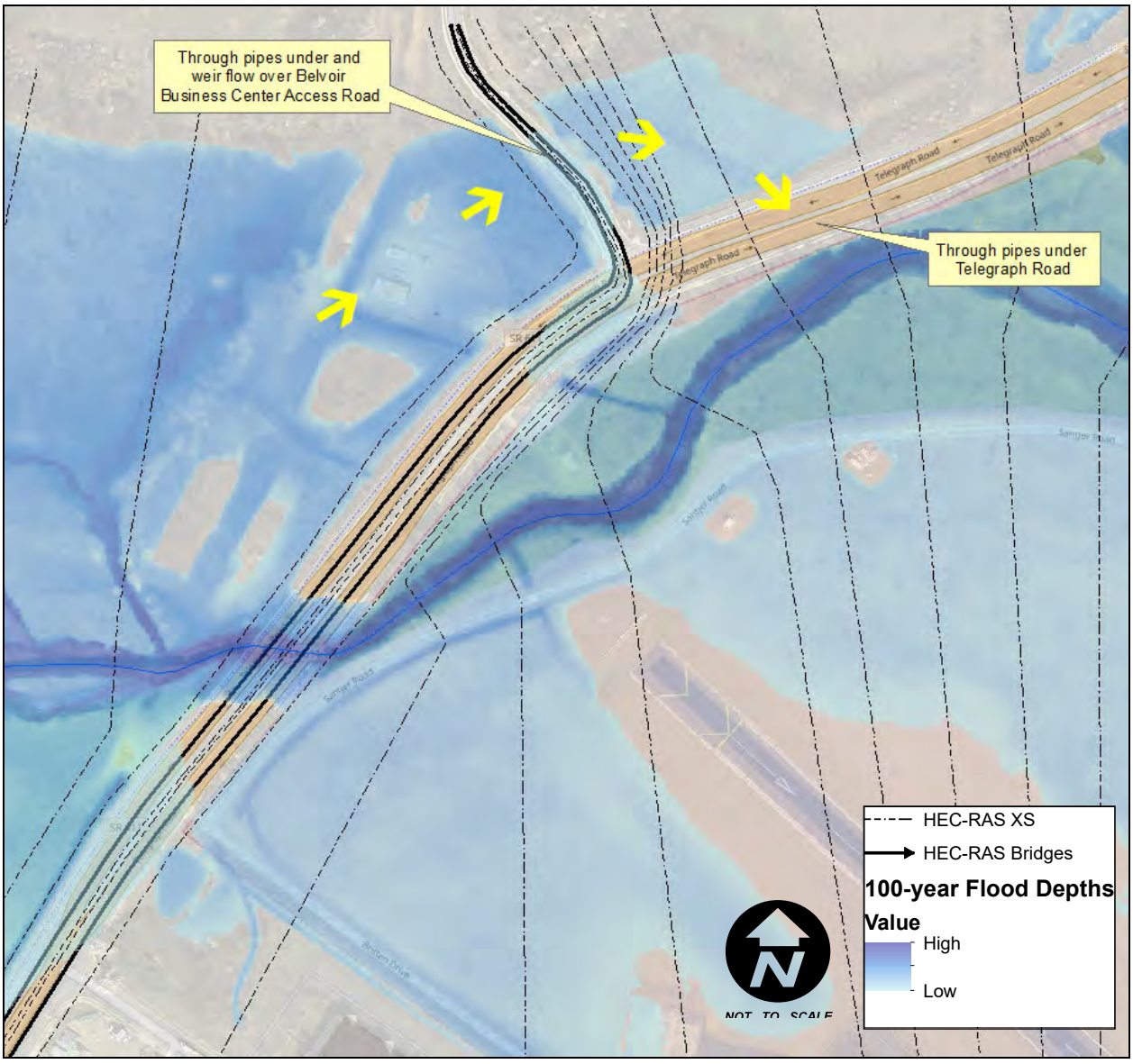
Data for road crossings were obtained from a USACE field survey in December 2018. The field team noted sizes, shapes and materials, and obtained inverts or top of culverts, low chord, high chord, top of road, and other required spot elevations. The bridge survey utilized the same methodology as the channel survey. A list of road crossings included in the HEC-RAS model is provided in **Table 3.1**.

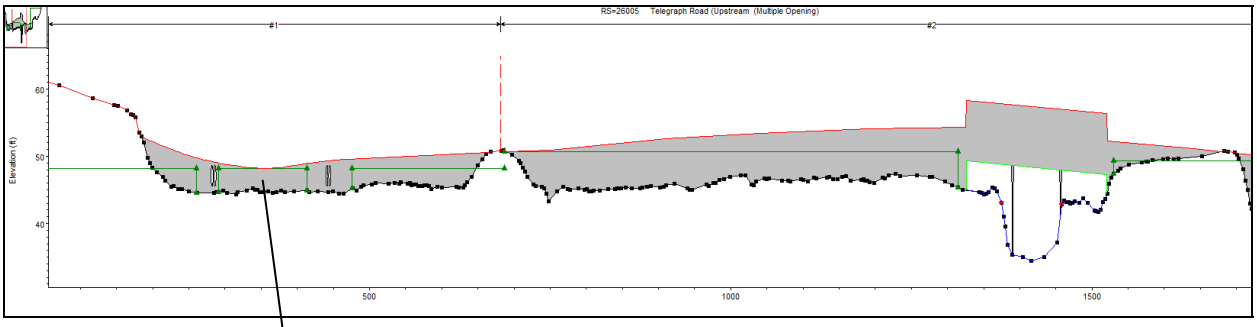
Table 3.1: Crossings Included in the Accotink Creek HEC-RAS Model

River Station	Survey ID	Name	Description
26005	AC5	Telegraph Road (Southbound)	Multi-span concrete bridge with two 1.5'/2.5' round nosed piers. Total span is 194.0 ft.
25944	AC5	Telegraph Road (Northbound)	Multi-span concrete bridge with two 1.5'/2.5' round nosed piers. Total span is 194.0 ft.
21359	AC4	Ehlers Road	Single span concrete bridge. Total span at top is 83.0 feet.
17493	AC3	Farrar Road	Single span concrete bridge. Total span at top is 113.0 feet.
13710	AC2	Richmond Highway (U.S. Route 1 South)	Multi-span concrete bridge with 3.0'/4.75' hammerhead pier and rip-rap abutments. Total span is 261.75 ft.
13617	AC2	Richmond Highway (U.S. Route 1 North)	Multi-span concrete bridge with 3.0'/4.75' hammerhead pier and rip-rap abutments. Total span is 261.75 ft.
9532	ACDC	Poe Road	Main bridge is a multi-span concrete bridge. Total span is 92.0 feet with a 2.0'/3.0' round nosed concrete pier. On left bank is triple 5.0' round concrete pipes in concrete headwall.

A unique split flow situation occurs at Telegraph Road. Data for this location was taken from a flood study completed by Urban in 2014 for the Belvoir Business Center. In the Urban analysis, the split flow option was utilized in HEC-RAS. For this current analysis, the same results were achieved by modeling Telegraph Road as a multi-opening, and setting ineffective flows appropriately to allow flow under and over the Belvoir Business Center Access Road back into the main channel of Accotink Creek. The modeling approach utilized is shown in **Figure 3.2**.

Figure 3.2: Split Flow at Telegraph Road





Pipes under and
Weir flow over Belvoir

Manning's Roughness Values

Roughness factors (Manning's "*n*") were chosen based upon engineering judgment, land use, aerial photography, and field observation. An *n* value of .150-.200 is considered high due to heavy obstructions such as large trees or for buildings, where an *n* value of .013 is considered low and is used for paved surfaces such as roads and parking lots. For Accotink Creek, a channel *n* values of .045 was set for the entire reach based upon the substrate of the channel and meandering nature of the stream. Overbank *n* values ranged from .013 for roadways to .200 for areas with buildings obstructing flow.

Ineffective Flow Areas and Obstructions

Ineffective flow areas were set appropriately at bridges and other areas where flood flow would not be effective. Ineffective flow areas were set carefully on a profile by profile basis to ensure that effective flow was only occurring in the model where there was a hydraulic connection with upstream and downstream cross-sections. In addition, ineffective flows were set based upon contraction and expansion angles dictated by bridges and naturally occurring high ground.

Obstructions in the model represent buildings that would occupy storage space for floodwaters. The obstructions were identified by recent aerial photography.

Contraction/Expansion Coefficients

Contraction/expansion values for the cross-sections at bridges were set at the FEMA recommended values of .3 and .5, respectively. All other cross-sections were assigned contraction/expansion coefficients of .1 and .3, respectively.

Reach Boundary Conditions

Normal depth was used as the downstream reach boundary condition for the HEC-RAS model. A normal depth slope of .0001 was input into the HEC-RAS model based upon the developed channel profile. Although Accotink Creek outfalls into the tidal portion of the Potomac River, the normal tide cycle has no influence on flood elevations on Accotink Creek at the location of DAAF.

Floodway Encroachment Analysis

The regulatory floodway is defined as the channel of a river or other watercourse and the adjacent land areas that must be reserved in order to convey the 100-year flood without cumulatively increasing the water-surface elevation by more than a designated height (surcharge). The National Flood Insurance Program (NFIP) standard surcharge of 1-foot has been adopted in Virginia.

A floodway encroachment analysis was outside the scope of this investigation and was not completed. It is assumed that FEMA will complete this analysis, if required, after USACE provides the model for the Fairfax County FIS update.

Modeling Notes

Special circumstances arise during HEC-RAS modeling that should be documented for future users of the model. For the existing-conditions HEC-RAS model for Accotink Creek, it is noted that the DEM used in the modeling was developed prior to significant grading at the Richmond Highway (U.S. Route 1)-Fairfax County Parkway interchange. Therefore, the modeling and mapping was manually adjusted based upon grading plans provided by the Federal Highway Administration (FHWA).

3.2 CALIBRATION AND VERIFICATION

There are no stream flow gages located within or near Accotink Creek within the studied reach and no historical flood information was available for the area. Because of this lack of data, calibration of the HEC-RAS model was not possible.

3.3 EXISTING-CONDITIONS RESULTS

The peak flows provided by FEMA were input into the HEC-RAS model to compute existing-conditions flood elevations for Accotink Creek. The plan was run in a sub-critical flow regime.

The HEC-RAS plan files were input into the CHECKRAS program to identify any deficiencies within the model. CHECKRAS is a program developed by FEMA to check the reasonableness of data from the HEC-RAS files. CHECKRAS reviews the HEC-RAS data to assure (1) the hydraulic estimates and assumptions made in the model appear to be justified; (2) the data is in accordance with FEMA requirements; and (3) the data is compatible with the assumptions and limitations of the HEC-RAS program. CHECKRAS identified minor issues with the model and these issues were rectified.

Although results were computed for all flood events included in the HEC-RAS model, the summary of results is focused on the 1-percent annual (100-year) chance flood. **Table 3.2** shows the existing-conditions 1-percent annual (100-year) chance flood elevations computed in this study for Accotink Creek near DAAF. The flood elevations range from 21.7 feet just upstream of Richmond Highway (U.S. Route 1) to 48.0 feet just downstream of Telegraph Road.

Table 3.2: Existing-Conditions HEC-RAS Results for Accotink Creek at DAAF

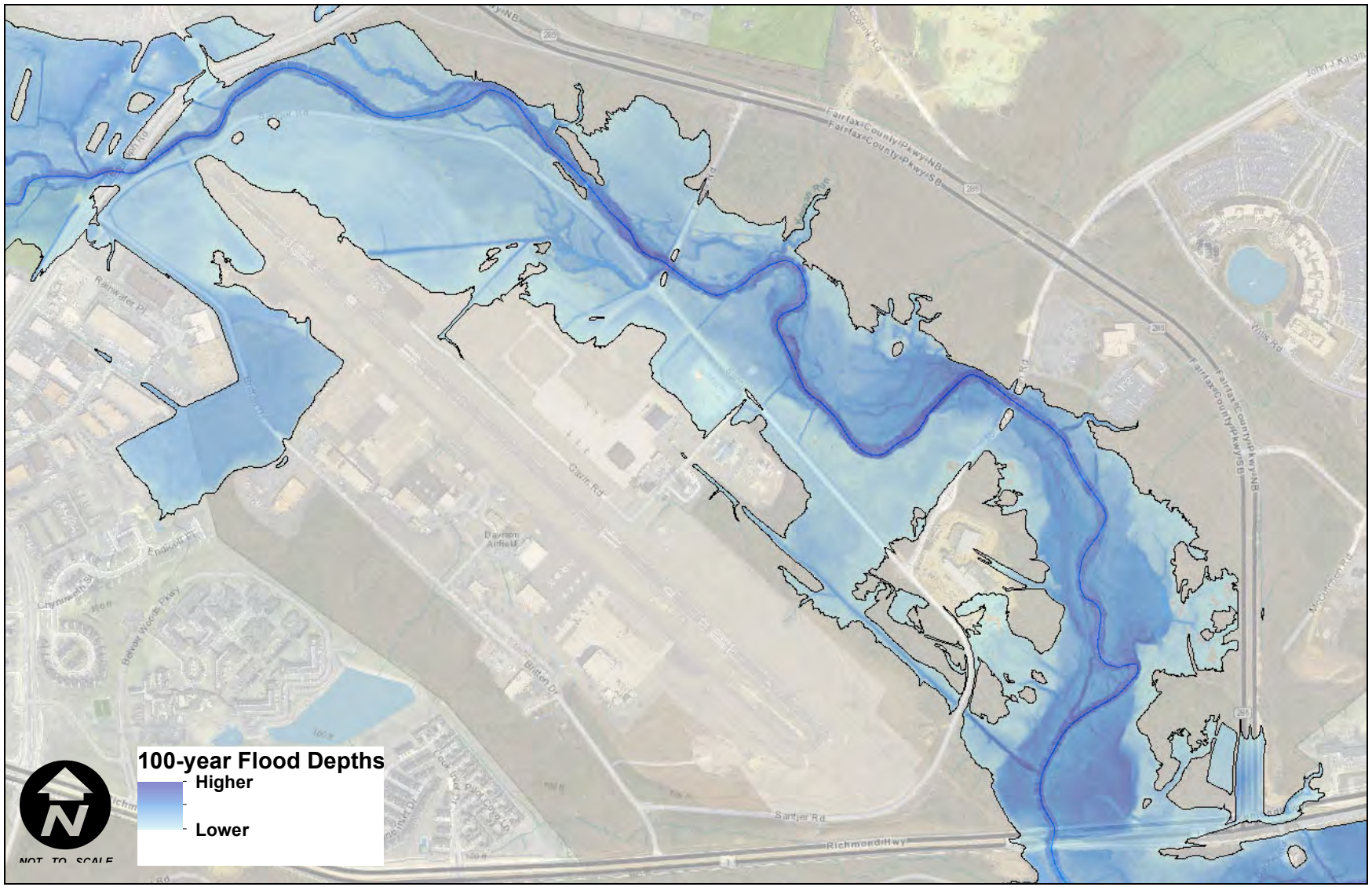
HEC-RAS Station	1-percent annual chance flood elevations (ft. NAVD88)
25944	Telegraph Road
25894	48.0
25712	47.8
25542	47.5
25329	46.5
25068	45.6
24832	45.2
24631	44.3
24396	43.7
24172	43.3
23948	42.7
23698	42.3
23500	41.9
23315	41.7
23098	41.2
22921	40.7
22699	40.4
22340	38.5
22033	38.3
21771	38.0
21567	37.6
21398	37.6
21359	Ehlers Road
21314	36.1
21135	35.1
20837	34.8
20358	34.2
19694	33.5
19395	32.8
19128	32.0
18738	31.8
18315	31.4
18079	31.1
17843	30.6
17600	29.2
17536	29.6
17493	Farrar Road
17449	28.2
17349	28.2
17231	27.8
16807	26.8
16434	26.2
16088	25.8
15685	25.3
14800	24.0
14236	23.3
13932	22.9
13799	21.7
13710	US Rte 1 South

3.4 FLOODPLAIN MAPPING

The results of the Existing-Condition HEC-RAS model for Accotink Creek was used to create digital floodplain inundation, depth grids, and water surface elevation grids for the 1-percent (100-year) and 0.2-percent (500-year) chance floods. The HEC-GeoRAS postprocessor and the DEM were used to delineate the floodplain boundaries and develop the depth and water surface elevation grids.

Figure 3.3 shows the existing-conditions 1-percent annual (100-year) chance floodplain for Accotink Creek at DAAF. The results of this analysis were used as a baseline to determine the impacts of the proposed projects associated with the DAAF ADP. These impacts are discussed in **Section 4** of this report.

Figure 3.3: Existing-Conditions 1-percent Annual (100-year) Chance Floodplain at DAAF



4 PROPOSED-CONDITIONS HYDRAULIC ANALYSIS

A Proposed-Conditions hydraulic analysis was completed using HEC-RAS in order to determine the impacts on the 1-percent annual (100-year) chance flood elevations and floodplain boundaries that the actions in the DAAF ADP would have on surrounding areas.

Peak flows provided by FEMA, and used in the existing-conditions analysis, were used for the Proposed-Conditions analysis. All actions in the DAAF ADP will not impact the flood flows generated from upstream portions of the watershed.

All components of the Proposed-Conditions HEC-RAS model are identical to the existing-conditions model except the station-elevation data of several cross-sections were modified to account for the encroachment into the right bank floodplain of Accotink Creek. The modifications to the HEC-RAS model and the project impacts are summarized below.

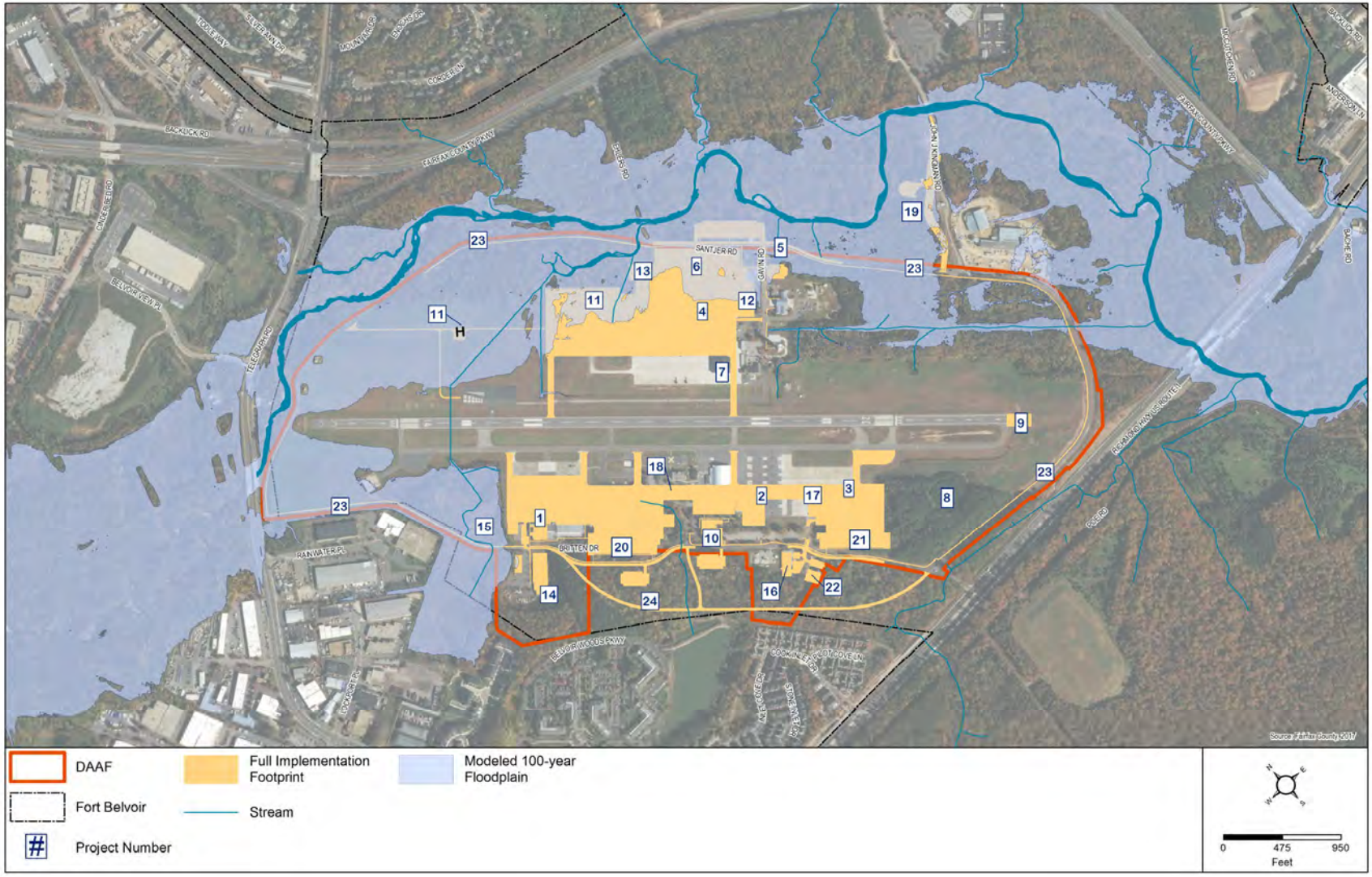
4.1 PROPOSED ACTION

The Army's proposed action at DAAF is to implement the 24 construction, renovation, demolition, and infrastructure improvement projects identified in the DAAF ADP. The proposed projects are organized into short-range (next ten years; Projects 1 through 9), mid-range (11 to 20 years from now; Projects 10 through 18), and long-range (21 to 30 years from now; Projects 19 through 24) phases. The Army is considering two ADP implementation alternatives: the Full Implementation Alternative, which would implement all 24 ADP projects; and the Partial Implementation Alternative, which would implement all short-range projects and select mid-range projects (Projects 10 and 14 through 18, only). The Full Implementation Alternative is the Army's preferred course of action because it would implement the full suite of projects recommended by the ADP. As such, DAAF would be modernized to meet all the known current and future mission sets of its tenant organizations.

All or portions of Projects 5 and 6 (short-range), 11, 12, and 13 (mid-range) and 19 and 23 (long-range) would be located within the 100-year floodplain on DAAF. All of these projects would be implemented under the Full Implementation Alternative, while only Projects 5 and 6 would be implemented under the Partial Implementation Alternative. The locations of these projects under each Alternative relative to the modeled 100-year floodplain are shown on **Figures 4.1** and **4.2**.

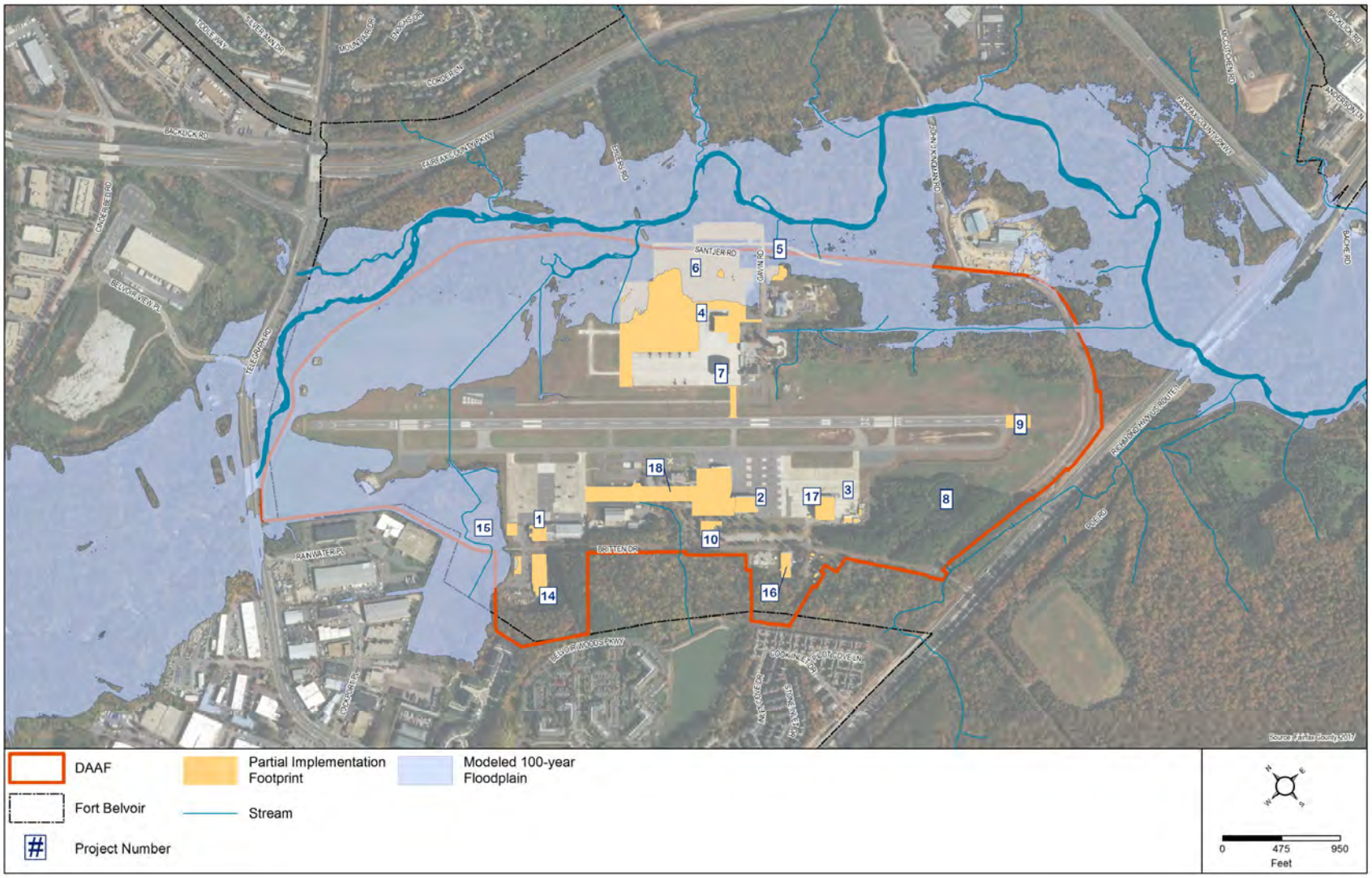
Descriptions of ADP projects that would occur in the 100-year floodplain are provided below (USACE, 2019).

Figure 4.1: Full Implementation Alternative – Proposed ADP Project Footprints and 100-Year Floodplain at DAAF



Source: (USACE, 2019a)

Figure 4.2: Partial **Implementation** Alternative – **Propo**sed **AD**P Project Fo**ot**prints and 100-Year Flo**odpl**ain at DAAF



Source: (USACE, 2019a)

Short-Range ADP Projects

Project 5: Project 5 would realign segments of Santjer Road and Gavin Road (totaling 3,168 linear feet) to accommodate construction of a new maintenance hangar facility for the 12th Aviation Battalion (AV BN) (Project 6). Santjer Road would be realigned approximately 100 feet to the north of its current alignment between its intersection with Ehlers Road and a point approximately 800 feet east of its intersection with Gavin Road. Gavin Road would be extended to the north to maintain its intersection with Santjer Road. This project would be entirely within the 100-year floodplain.

Project 6: Project 6 would build an 8-bay, 145,100-square-foot aircraft maintenance hangar for the 12th AV BN on a site to the northeast of existing Building 3232 that currently consists of maintained lawn and vegetation. This project has been programmed for Fiscal Year 2024. The new hangar would include an aircraft wash rack and an associated ground support equipment (GSE) building. The existing aircraft parking apron near the site of the new hangar would be expanded by approximately 300,000 square feet (6.9 acres) to accommodate this facility.

One component of Project 6, a paved, approximately 55,000-square-foot (1.3-acre), 147-space parking lot for privately owned vehicles, would be built on the opposite side of the newly realigned Santjer Road (Project 5) from the new hangar. To effectively consolidate the 12th AV BN on the northeast side of the airfield and comply with operational safety criteria (which is part of the purpose for Project 6 and a number of other ADP projects), the new hangar, parking lot, and portions of the expanded aircraft parking apron would be built in areas of the 100-year floodplain associated with Accotink Creek.

Mid-Range ADP Projects

As noted above, the following mid-range projects would be built under the Full Implementation Alternative only.

Project 11: Project 11 would build a 76,210-square-foot, 10-bay aircraft storage hangar for the 12th AV BN northwest of the proposed 8-bay hangar (Project 6). Site improvements associated with the new hangar would include all necessary grading, the installation of buried utilities, and an adjacent approximately 380,000-square-foot (8.7-acre) expansion of the aircraft parking apron. A new taxiway approximately 75 feet wide and 500 feet long (37,500 square feet [0.9 acre]) would connect the expanded apron to the runway, and a new helipad approximately 100 feet on each side (10,000 square feet [0.2 acre]) would be built approximately 700 feet to the west. For reasons similar to those described for Project 6, the new 10-bay hangar, helipad, and the majority of the expanded aircraft apron and new taxiway would be built in the 100-year floodplain associated with Accotink Creek.

Project 12: This project would build a 52,243-square-foot, 4-bay aircraft storage hangar to the southeast of the proposed 8-bay hangar (Project 6). A new paved 17,500 square-foot parking lot would be built in association with this project. To provide sufficient standoff distance from nearby existing and proposed facilities in accordance with DoD

requirements, a small portion of the new parking lot would be located within the 100-year floodplain associated with Accotink Creek.

Project 13: Project 13 would build a 20,000-square-foot, 3-bay paint shop for the 12th AV BN immediately northwest of the proposed 8-bay hangar (Project 6). For reasons similar to those described for Projects 6 and 11, the new paint shop would be built within the 100-year floodplain associated with Accotink Creek.

Long-Range ADP Projects

As previously noted, these long-range projects would be built under the Full Implementation Alternative only.

Project 19: This project would build a new vehicular access control point (ACP) to replace the existing ACP on John J. Kingman Road. The existing facility currently serves, and the new facility would continue to serve, as the primary vehicular ACP for DAAF. The existing ACP would be incorporated into the site of the new facility; following completion of the new ACP, the existing facility would be demolished and areas not paved or built on would be vegetated or maintained in an otherwise permeable condition. The new ACP would be partially built within the 100-year floodplain on DAAF.

Project 23: Project 23 would build a paved, 8-foot-wide multi-purpose trail adjacent to Santjer Road on the north and east sides of the airfield and along Britten Drive on the airfield's south side. The trail would provide an off-road facility for physical training, bicycling, troop movements, and general connectivity between facilities for DAAF personnel. Collectively, the trail segments would have a length of 9,250 feet and a total area of 74,000 square feet (1.7 acres).

Analysis of Project Impacts using HEC-RAS Model

To determine the effects the proposed ADP projects would have on the floodplain, the modeled cross sections (**Section 3**) were revised to reflect the proposed construction. Areas where proposed construction is expected to take place were raised to an elevation of 42 feet, and the models recalculated. The additional modeling was performed to show the results from the Full Implementation Alternative (all proposed ADP projects) and the Partial Implementation Alternative (reduced program of proposed ADP projects, as noted above). The Partial Implementation Alternative excludes some construction on the north side of the airfield relative to Full Implementation (note that it was assumed that a parking lot proposed as part of Project 6 [see above] on the north side of the airfield would be built at existing grade).

4.2 IMPACTS

Proposed ADP projects in the Full Implementation Alternative would cumulatively occupy or disturb approximately 10 acres of the 100-year floodplain on DAAF. Effects on the 100-year floodplain would begin approximately at the downstream location of the proposed construction (Cross Section 19694 in the model) and continue upstream to a point

approximately at the northwest end of the runway (Cross Section 24172), about 2,000 feet downstream of the Telegraph Road bridge. The maximum estimated horizontal increase in the floodplain would be approximately 1.96 feet, occurring just downstream of Ehlers Road (**Table 4-1**), under either of the Alternatives. As shown on **Figures 4.3** and **4.4**, these areas would be exceedingly small relative to the current extent of the 100-year floodplain on DAAF.

Table 4-1 also shows existing and projected 100-year water surface elevation in feet for existing conditions and the Full and Partial Implementation Alternatives. Areas on DAAF where the modeled floodplain would increase vertically as a result of the proposed ADP would also be minimal under either of the action alternatives.

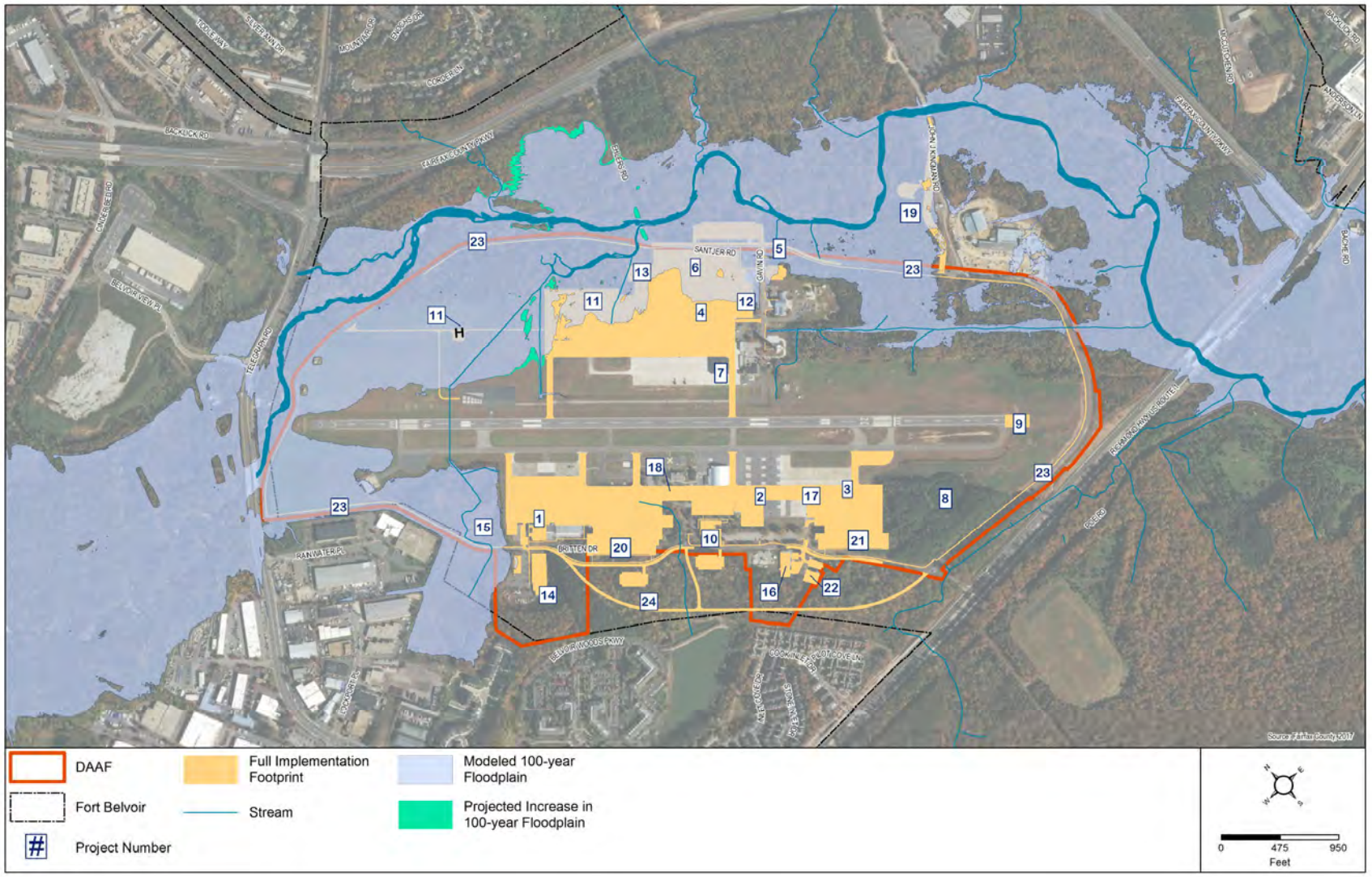
All potential adverse impacts on property or life downstream of the Alternatives would be limited in scope to DAAF and areas on Fort Belvoir that are currently undeveloped and in a conservation status. Proposed ADP projects occurring in the floodplain would incorporate best management practices (BMPs) and low impact development (LID) measures, to the extent practicable, to minimize the volume and velocity of runoff from the project sites and reduce the potential for adverse impacts on the 100-year floodplain and areas downstream thereof. As such, it is anticipated that potential adverse impacts on the 100-year floodplain resulting from the proposed ADP projects under either action alternative would be minimal.

Table 4-1: 100-Year Floodplain Water Surface Elevations and Increases under the Action Alternatives

Cross Section Location	Water Surface Elevation (feet)			Water Surface Increase (feet)	
	Existing	Partial Implementation Alternative	Full Implementation Alternative	Partial Implementation Alternative	Full Implementation Alternative
19395	32.80	32.80	32.80	0	0
19694	33.48	33.38	33.38	-0.10	-0.10
20358	34.23	33.88	33.88	-0.35	-0.35
20837	34.82	34.20	34.20	-0.62	-0.62
21135	38.37	37.69	37.69	-0.68	-0.68
21314	36.14	38.10	38.09	1.96	1.95
21398	37.56	38.49	38.71	0.93	1.15
21567	37.63	38.59	38.80	0.96	1.17
21771	38.03	38.75	39.04	0.72	1.01
22033	38.32	38.94	39.22	0.62	0.90
22340	38.51	39.06	39.38	0.55	0.87

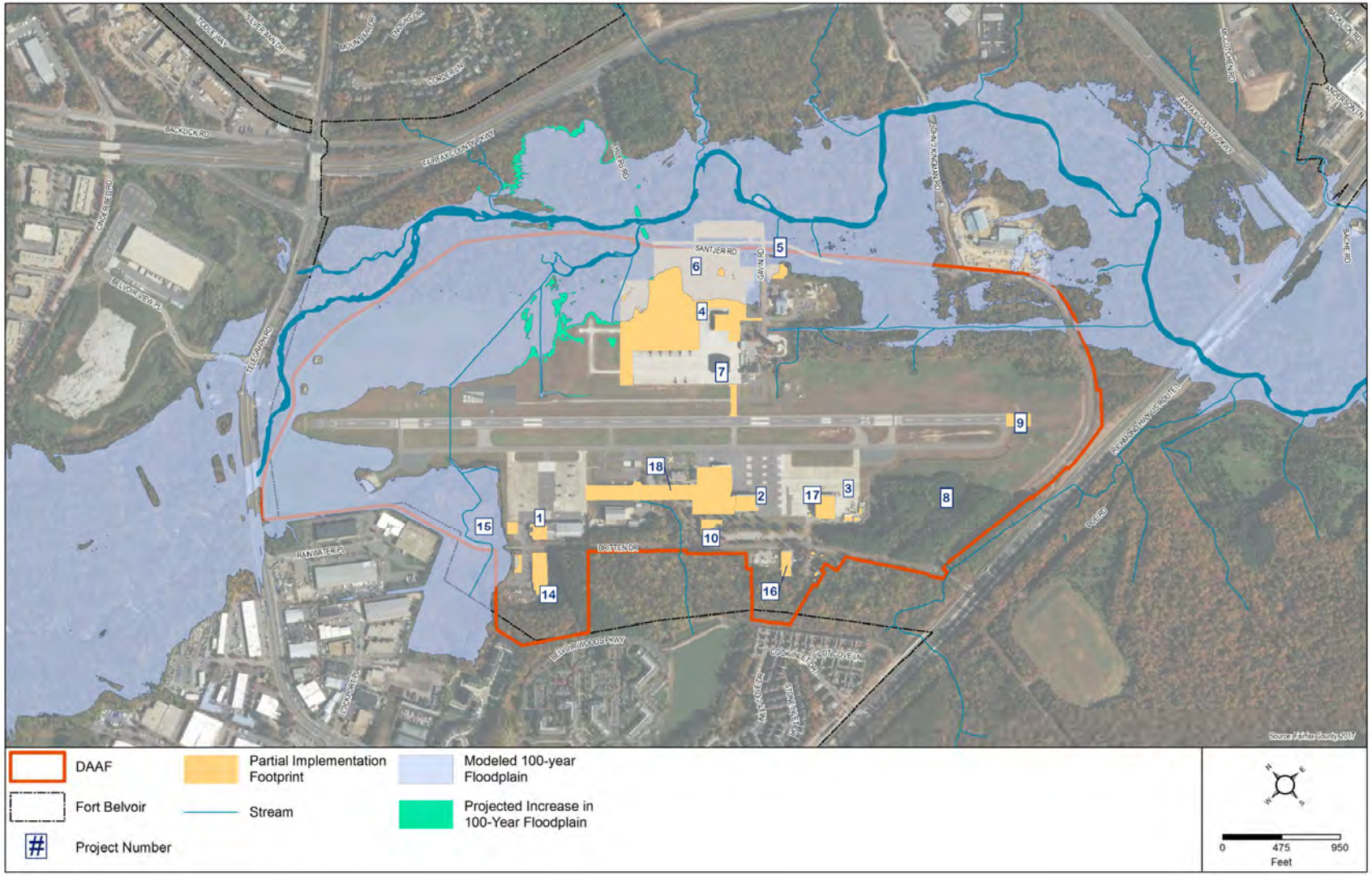
Cross Section Location	Water Surface Elevation (feet)			Water Surface Increase (feet)	
	Existing	Partial Implementation Alternative	Full Implementation Alternative	Partial Implementation Alternative	Full Implementation Alternative
22699	40.41	40.51	40.59	0.10	0.18
22921	40.72	40.79	40.87	0.07	0.15
23098	41.24	41.28	41.32	0.04	0.08
23315	41.70	41.72	41.74	0.02	0.04
23500	41.91	41.93	41.95	0.02	0.04
23698	42.27	42.28	42.30	0.01	0.03
23948	42.74	42.75	42.76	0.01	0.02
24172	43.30	43.31	43.31	0.01	0.01
24396	43.67	43.67	43.67	0	0
Source: (USACE, 2019b)					

Figure 4.3: Full Implementation Alternative – Projected Surface (Horizontal) Increase to 100-Year Floodplain



Source: (USACE, 2019a)

Figure 4.4: Partial **Implementation** Alternative – **Projec**ted Surface (Ho**rizonta**l) **Increa**se to 100-Year Flood**plain**



Source: (USACE, 2019a)

5 CONCLUSIONS

The Army has prepared an ADP to guide future development at DAAF. Implementation of the proposed ADP projects would provide facilities and infrastructure that would meet the current and future needs of the airfield's tenants. All or portions of seven of the 24 proposed ADP projects would be implemented in the 100-year floodplain associated with Accotink Creek on DAAF. To accurately estimate potential impacts on the 100-year floodplain resulting from the proposed projects in accordance with Executive Order 11988, USACE developed an Existing-Conditions HEC-RAS model to determine flood elevations along Accotink Creek. The HEC-RAS model incorporated data provided by FEMA, acquired by USACE in the field, and other sources. All hydraulic modeling was completed to comply with FEMA's guidance documents and standards, as this modeling will be provided to FEMA for use in the upcoming restudy of the FIS for Fairfax County, Virginia.

Output from USACE's Existing-Conditions HEC-RAS model was used as a baseline to determine the impacts of the proposed ADP projects on the 100-year floodplain. Under the Full Implementation Alternative (the Army's preferred course of action for implementing the proposed projects), seven of the 24 projects would involve construction and operation of facilities and infrastructure in the 100-year floodplain associated with Accotink Creek on DAAF. These projects would directly impact approximately 10 acres within the 100-year floodplain. Under the Partial Implementation Alternative, only two projects would be built and operated in the 100-year floodplain.

Under either of the action alternatives, the maximum estimated horizontal or vertical increase in flood waters on DAAF would not exceed approximately 2 feet from baseline (**Table 4.1**; **Figures 4.3** and **4.4**). Additionally, these projected increases are limited to select areas of DAAF that collectively represent a small fraction of the existing floodplain.

All potential impacts on property or life downstream would be limited in scope to DAAF and areas on Fort Belvoir that are currently undeveloped and in a conservation status. Proposed ADP projects occurring in the floodplain would incorporate BMPs and LID measures to minimize the volume and velocity of runoff from the project sites and reduce the potential for adverse impacts on the 100-year floodplain and areas downstream thereof. As such, it is anticipated that impacts on the 100-year floodplain resulting from the proposed ADP projects under either action alternative would be minimal.

6 REFERENCES

USACE. (2016). *River Analysis System HEC-RAS, User's Manual, Version 5.0.*

USACE. (2019a). *Davison Army Airfield Area Development Plan, Check Copy Draft Environmental Impact Statement.* Fort Belvoir, VA.

USACE. (2019b). *Technical Memorandum: One-Hundred Year Floodplain Modling for the Davison Army Airfield, revised March, 2019.* Fort Belvoir, VA.

Appendix E – Air Quality Analysis and Record of Non-Applicability (RONA)

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E.1 EMISSIONS ESTIMATIONS AND METHODOLOGY

The U.S. Army has considered all foreseeable direct and indirect sources of air emission associated with the proposed action. *Direct emissions* are emissions that are caused or initiated by a federal action and occur at the same time and place as the action. *Indirect emissions* are reasonably foreseeable emissions that are caused by the action but might occur later in time and/or be farther removed in distance from the action itself, and that the federal agency can practicably control. More specifically, project-related direct emissions would result from the following:

- *Construction and demolition activities*: The use of non-road equipment (e.g., bulldozers, backhoes), worker and delivery vehicles, the use of volatile organic compound (VOC) paints, paving off-gasses, and fugitive particles from surface disturbances
- *Operational activities*: Both the partial and full alternative action will not add any new emission sources or changes in the air field operations, only renovation and modernization of the Davison Army Airfield, so no increase in air emissions are expected from the air field operations. Although there may be increases in sizes of buildings it has been assumed that all additional space heating will be supplied by existing grid power. Therefore, no emissions were estimated for operational activities.

E.1.1 Construction Emissions

All direct and indirect emissions associated with the No Action, Partial and Full Alternative actions were estimated. Both the partial and full alternative action will not add any new emission sources or changes in the air field operations, only renovation and modernization of the Davison Army Airfield, so no increase in air emissions are expected from the air field operations. Since the specific schedule (30 years) and the lack of actually programmed projects (with one exception: the 8- Bay Aircraft Maintenance Hangar [Project 6]) assumptions have been made to estimate the air emission for the modernization activities for the Partial and Full Alternative based on the square footage of each project and previous RONA (Fort Belvoir, 2017) analyses for all projects except the planned 12th AV BN 8- Bay Aircraft Maintenance Hangar. The following emission per square footage was based on a previous RONA prepared for Fort Belvoir – Repair/Alter building 1189 for RMDA (Fort Belvoir, 2017).

Table E-1 Emission per Square Footage Emission Factor

RONA - Repair/Alter Building 1189 for RMDA	NO_x	PM	SO_x	VOC	CO
Tons/Sq Foot	1.05E-05	7.95E-07	8.01E-07	1.98E-06	5.71E-06

The emission per square footage was applied to anticipated footage of each of the planned projects (except the 12th AV BN 8- Bay Aircraft Maintenance Hangar) to obtain emission estimates. The estimated emissions (both direct and indirect) are presented in Table E-2.

Since a more specific schedule of construction was available for the 12th AV BN 8- Bay Aircraft Maintenance Hangar direct and indirect emissions were estimated based on construction duration, manpower estimates and construction equipment/vehicles. Construction and demolition emissions associated with the use of construction equipment (e.g., bulldozers, backhoes), worker and delivery vehicles, the use of VOC paints, paving off-gasses, and fugitive particles from surface disturbances are presented in Table E-3. The methodology used for the constructed related emissions are described in the following subsections.

E.1.1.1 Heavy Construction Equipment

Pollutant emissions resulting from activities associated with constructing the proposed buildings, parking facilities, and roadways were estimated. The typical construction would involve such activities as demolition of existing buildings or structures, utility installation, road construction, site clearing and

grading, building construction, and asphalt paving.

Construction and demolition would involve the use of various non-road equipment, power generators, and trucks. Pieces of equipment to be used for building construction include, but are not limited to, backhoes, loaders, excavators, air compressors, dozers, cranes, pavers, graders, rollers, and heavy trucks. Information regarding the number of pieces and types of construction equipment to be used on the project, the schedule for deployment of equipment (monthly and annually), and the approximate daily operating time (including power level or usage factor) were estimated assuming a construction schedule of one year for the 8- Bay Aircraft Maintenance Hangar.

Emissions from construction activities were estimated based on the projected construction activity schedule, the number of vehicles/pieces of equipment, and vehicle/equipment utilization rates. Emission factors for heavy-duty diesel equipment were obtained Air Emissions Guide for Air Force Mobile Sources, U.S. Air Force Installations, 2013.

Table E-2 Estimated Emissions Short-, Mid- and Long-term Projects

			Estimated Air Quality Emissions (tons)				
	Short-term Projects (one to 10 years)	**SQ FT**	**NOx**	**PM2.5**	**SO2**	**VOC**	**CO**
1	Renovate Building 3121, DCARNG Airfield Operations Section	13,000	0.14	0.01	0.01	0.03	0.07
2	Renovate Building 3145, OSA-A/OSACOM Hangar	23,004	0.24	0.02	0.02	0.05	0.13
3	Renovate Building 3151, 12 AV BN D Company Hangar	35,208	0.37	0.03	0.03	0.07	0.20
4	Renovate Building 3232, 12th AV BN C Company Hangar	17,698	0.19	0.01	0.01	0.04	0.10
5	Realign Santjer Road and Gavin Road		0.10	0.10	0.10	0.10	0.10
6	Construct 12th AV BN 8-Bay Aircraft Maintenance Hangar	145,100	13.71	1.10	1.00	1.17	5.05
7	Construct North Taxiway Connection	12,980	0.14	0.01	0.01	0.03	0.07
8	Remove Earthen Knoll		0.10	0.10	0.10	0.10	0.10
9	Construct Runway Safety Overrun	20,000	0.21	0.02	0.02	0.04	0.11
Total Short-Term (total emissions for ten year period)			**15.19**	**1.40**	**1.30**	**1.61**	**5.94**
	Mid-term Projects (11 to 20 years)						
10	Repair and Expand Building 3146	49,487	0.52	0.04	0.04	0.10	0.28
11	Construct 12th AV BN 10-Bay Storage Hangar	76,210	0.80	0.06	0.06	0.15	0.44
12	Construct 12th AV BN 4-Bay Storage Hangar and Secondary Parking Lot	52,243	0.55	0.04	0.04	0.10	0.30
13	Construct 12th AV BN Aircraft Paint Shop	20,000	0.21	0.02	0.02	0.04	0.11
14	Repair and Expand Building 3212, DCARNG Readiness Center	2,000	0.02	0.00	0.00	0.00	0.01
15	Construct DCARNG Aircraft Wash Rack	8,730	0.09	0.01	0.01	0.02	0.05
16	Renovate Building 3165, OSA-A/OSACOM Operations Facility	15,332	0.16	0.01	0.01	0.03	0.09
17	Relocate NVESD	69,443	0.73	0.06	0.06	0.14	0.40
18	Expand Aircraft Parking Apron	440,653	4.63	0.35	0.35	0.87	2.52
Total Mid-Term (total emissions for ten year period)			**7.71**	**0.58**	**0.59**	**1.46**	**4.19**
Total Partial Alternative (One to 20 years)			**22.90**	**1.98**	**1.89**	**3.07**	**10.13**
	Long-term Projects (21 to 30 years)						
19	Replace Farrar Gate Access Control Point and Install Redundant Communications Line	100,487	1.06	0.08	0.08	0.20	0.57
20	Construct NVESD Hangar	60,000	0.63	0.05	0.05	0.12	0.34
21	Construct OSA-A / OSACOM Operational Flight Division Hangar	70,000	0.74	0.06	0.06	0.14	0.40
22	Construct OSA-A/OSACOM Operations Facility	21,500	0.23	0.02	0.02	0.04	0.12
23	Construct Perimeter Road Multi-purpose Trail	74,000	0.78	0.06	0.06	0.15	0.42
24	Construct Alternative Perimeter Road	323,320	3.40	0.26	0.26	0.64	1.85
Total Long-term (total emissions for ten year period)			**6.82**	**0.52**	**0.52**	**1.29**	**3.71**
Total All Projects			**29.73**	**2.50**	**2.41**	**4.36**	**13.84**

The equipment and vehicle operation hours were estimated based similar construction projects.

Emissions from the heavy construction equipment were estimated using the average rated HP of the engine, the equipment load factor, the engine emission factor and the number of hours the engine is operated. The average rated HP of the engine was obtained from Nonroad Engine and Vehicle Emission Study (USEPA, 1991).

The following formula was used to calculate hourly emissions from non-road engine sources, including heavy construction equipment.

Emission = Horse Power x Load Factor x Emission Factor x Operating Hours

An example emission calculation for CO emissions from an Asphalt Paver is:

E CO Asphalt Pavers = (91 HP) x (0.59) x (4.76 lb/1000 HP-hr) x (200 hrs)

E CO Asphalt Pavers = 51 lbs

The total annual emissions from construction equipment for the 8- Bay Aircraft Maintenance Hangar Project are summarized in Table E-3.

Table E-3. Estimated Annual Emissions from Construction Equipment - 8-Bay Aircraft Maintenance Hangar

Emissions from Construction Equipment (tons)	NO_x	PM2.5	SO_x	VOC	CO
Total Air Emissions: Construction Equipment	6.80	0.40	0.50	0.45	2.47

E.1.1.2 Construction Worker and Delivery Trucks Vehicles

Emissions due to construction worker (light duty) and delivery truck (heavy duty) vehicles were included in the analysis. Emission factors for the motor vehicles were conservatively calculated using the Air Emissions Factor Guide to Air Force Mobile Sources Installations (Air Force Civil Engineer Center, 2013). These emission factors were then multiplied by the vehicle operational hours to determine motor vehicle emissions. The analysis assumed conservatively that the worker's vehicle would drive 30 miles per day at an average speed of 35 miles per hour.

An example emission calculation for CO emissions from the light duty vehicles is:

E CO =VMT (miles) x EF (gm/mile)
VMT = (Daily miles) x (No of Days per year)
VMT = (60) x (240) =
EF CO = (0.57)

E CO = (60 miles) x (240 days) x (0.57 gm/mile) /(453 gm/lb)
E CO = 18.1 lbs

The total annual emissions from construction worker (light duty) and delivery truck vehicles for the 8- Bay Aircraft Maintenance Hangar Project are summarized in Table E-3.

Table E-4. Estimated Annual Emissions from Construction Worker and Delivery Truck Vehicles - 8-Bay Aircraft Maintenance Hangar

Emissions from Construction Worker and Delivery Truck Vehicles (tons)	NO_x	PM2.5	SO_x	VOC	CO
Total Air Emissions: Construction Worker and Delivery Trucks Vehicles	0.11	0.01	0.001	0.06	0.11

E.1.1.3 Emissions from Adhesive and Paints

VOC emissions from Adhesive and Paints, primarily parking lot line painting, carpeting and wall painting activities were estimated an assumed 0.33 pounds of VOC per gallon applies for carpet adhesive and 1.25 pounds of VOC emission per gallon of paint applied. The following formula was used to calculate emissions from the painting of the parking lot and buildings:

$E = [(F \times G) / 1000] \times H$

where: E = emissions of VOCs from architectural coatings [tons]

F = pounds of VOC emissions per gallon [lbs]

G = total area to be coated (floor area x 2) [ft^2]

H = paint coverage.

A sample calculation for parking lot line coating VOC is provided below:

Parking Lot = 55,000 ft^2

E = [(1.25 lb/gallon) x [(55,000 ft^2) /(350 ft^2/gallon of paint) x 2)] /2,000 lb/ton

= 0.196 tons

The total annual emissions from Adhesive and Paints from the 8- Bay Aircraft Maintenance Hangar Project are summarized in Table E-5.

Table E-5. Annual VOC Emissions from Architectural Coatings - 8-Bay Aircraft Maintenance Hangar

VOC Emissions from Architectural Coatings (tons)	NO_x	PM2.5	SO_x	VOC	CO
Total Air Emissions: Adhesives and Paints	NA	NA	NA	0.206	NA

E.1.1.4 Asphalt Curing Emissions

Asphalt paving would generate emissions from (1) asphalt curing, (2) operation of onsite paving equipment, and (3) operation of motor vehicles (both delivery trucks and worker commuting vehicles). Because the emissions resulting from the operation of onsite paving equipment, trucks, and vehicles were included in the previously, only asphalt curing-related emissions are discussed in this section. Asphalt curing-related VOC emissions were calculated based on the amount of paving for the onsite parking lot for the 8- Bay Aircraft Maintenance Hangar. The following assumption was used in VOC emission calculations for asphalt curing (CAPCOA, 2017):

E = area paved x 2.62 lb VOC/acre

A sample calculation is provided below:

Paved area = 1.26 acres

E = (1.26 acres) x (2.62 lb VOC/acre) / (2000 lb/ton)

= 0.002 ton

The total annual emissions from Asphalt Paving Activities from the 8- Bay Aircraft Maintenance Hangar

Project are summarized in Table E-6.

Table E-6. Annual VOC Emissions from Asphalt Paving Activities - 8-Bay Aircraft Maintenance Hangar

VOC Emissions from Asphalt Paving Activities - 8-Bay Aircraft Maintenance Hangar (tons)	NO_x	PM2.5	SO_x	VOC	CO
Total Air Emissions: Asphalt Paving Activities	NA	NA	NA	0.002	NA

E.1.1.5 Surface Disturbance

The quantity of dust emissions from construction operations is proportional to the area of land being worked and to the level of construction activity. The following assumptions were used in $PM_{2.5}$ emission calculations for fugitive dust emissions (AFCEE Air Emissions Inventory Guidance, 2009)

E_{TSP} (tons/yr) = 80 x (No. of 8-hr days) x (Acres/day) /(2000lbs/ton)
$E_{PM2.5}$ (tons/yr) = E_{TSP} * 0.45

A sample calculation is provided below:

Disturbed area = 80 acres
E_{TSP} (tons/yr) = 80 x (240) x (0.034 Acres/day) /(2000 lbs/ton)
E_{TSP} (tons/yr) = 0.326
$E_{PM2.5}$ (tons/yr) = 0.147

The total annual emissions from Fugitive Dust from Land Disturbance for the 8- Bay Aircraft Maintenance Hangar Project are summarized in Table E-7.

Table E-7. Annual $PM_{2.5}$ Emissions from Surface Disturbance - 8-Bay Aircraft Maintenance Hangar

$PM_{2.5}$ Emissions from Surface Disturbance - 8-Bay Aircraft Maintenance Hangar (tons)	NO_x	PM2.5	SO_x	VOC	CO
Total Air Emissions: Fugitive Dust from Land Disturbance	NA	0.147	NA	NA	NA

E.1.1.6 Demolition Activities

Demolition of the existing facilities are planned as part of the short-, mid- and long-term projects but the schedule and activities associated are unknown at this time. Demolition activities will generate combustion and fugitive dust emissions similar to those described above for construction activities. Best management practices will be used to minimize fugitive dust emissions. Based on a review of the equipment expected during the demolition phase, emissions during this phase are expected to be lower than emissions during the construction phase. As conservative assumption it has been assumed that demolition activities will have the same level of combustion emission as Construction Equipment and particulate emissions as Surface Disturbance. These are shown in Table E-8

Table E-8. Annual Emissions from Demolition - 8-Bay Aircraft Maintenance Hangar

Emissions from Demolition Activities Disturbance - 8-Bay Aircraft Maintenance Hangar (tons)	NO_x	PM2.5	SO_x	VOC	CO
Total Air Emissions: Fugitive Dust from Land Disturbance	6.80	0.55	0.50	0.45	2.47

E.1.1.7 Total Project Emissions

The total annual project emissions from construction of the 8- Bay Aircraft Maintenance Hangar Project are summarized in Table E-9

Table E-9 Total Project Emissions - 8-Bay Aircraft Maintenance Hangar

Total Project Air Emissions (tons) 12th AV BN 8-Bay Aircraft Maintenance Hangar					
	NO_x	**PM2.5**	**SO_x**	**VOC**	**CO**
Total Air Emissions: Fugitive Dust from Land Disturbance		0.147			
Total Air Emissions: Asphalt Paving Activities				0.002	
Total Air Emissions: Adhesives and Paints				0.206	
Total Air Emissions: Construction Worker and Delivery Trucks Vehicles	0.11	0.01	0.001	0.06	0.11
Total Air Emissions: Construction Equipment	6.80	0.40	0.50	0.45	2.47
Total Air Emissions from Demolition Activities Disturbance	6.80	0.55	0.50	0.45	2.47
Total (tons)	**13.71**	**1.10**	**1.00**	**1.17**	**5.05**

E.2 Emission Calculations

Total Air Emissions: Construction Equipment

Project Description	Construction Equipment	Units	Hrs/Day	Days	Usage (hrs)	Emissions (lbs/yr)				
						CO	NO_x	VOC	PM2.5	SO_x
12th AV BN 8-Bay Aircraft Maintenance Hangar	Asphalt Pavers	1	10	20	200	51	115	10	9	9
	Plate Compactors	1	10	20	200	7	10	2	1	1
	Concrete Pavers	1	10	20	200	73	164	14	13	13
	Paving Equipment	2	10	60	1200	439	819	81	74	60
	Trenchers	1	10	20	200	57	85	9	9	6
	Bore/Drill Rigs	1	10	10	100	49	138	12	10	8
	Excavators	2	10	60	1200	486	1,300	97	92	109
	Concrete/Indust. Saw	1	10	20	200	58	77	9	10	6
	Cement Mixers	1	10	60	600	20	45	5	4	2
	Cranes	1	10	14	140	35	141	10	7	10
	Off-Highway Trucks	2	10	160	3200	3,379	10,405	591	526	757
	Tractor/Loader/Backhoe	2	10	60	1200	284	303	66	46	20
	Total - Construction Equipment Emissions (tons)					**4,939**	**13,602**	**906**	**802**	**1,000**
	TOTAL				**(lbs/yr):**	**4,939**	**13,602**	**906**	**802**	**1,000**
					(tons/yr):	**2.47**	**6.80**	**0.45**	**0.40**	**0.50**

Assumptions:

- Assumptions were made for use of equipment including industrial saws, backhoes, and grader for demolition and preparation, cement mixers, paving equipment, and pavers for pouring the concrete building foundation slab, rollers and asphalt pavers for parking lot construction, and loaders and forklifts for movement of debris and materials. It was assumed that off-highway trucks would be used to haul debris and materials.

Source: The above estimates were calculated using the methodology and information provided in the *Nonroad Engine and Vehicle Emission Study--Report, US EPA Doc 21A-2001, 1991* and the *Air Emissions Guide for Air Force Mobile Sources, U.S. Air Force Installations, 2013.*

Note: Assume $PM_{10} = PM_{2.5}$

Total Air Emissions: Construction Worker and Delivery Trucks Vehicles

Personal Vehicles	Model Year	Calendar Year	Emission Factors (grams/mile)				
			CO	NO_x	VOC	$PM_{2.5}$	SO_x
Heavy Duty Diesel Trucks - Class 2b	2107	2020	0.58	1.883	0.29	0.053	0.012
Light Duty Diesel Trucks - Class 3/4	2017	2020	0.57	0.32	0.30	0.032	0.006

Personal Vehicles	Number of Days	Miles/Day	Emissions (lbs/year)				
			CO	NO_x	VOC	$PM_{2.5}$	SO_x
Heavy Duty Diesel Trucks	240	60	36.83	119.56	18.41	3.37	0.76
Light Duty Diesel Trucks	240	60	179.4	100.64	95.88	10.16	1.90

Total (lbs/yr)	216.20	220.20	114.29	13.52	2.67
Total (tons/yr)	0.11	0.11	0.06	0.007	0.001

Assumptions:

- The project duration is assumed to be 12 months 240 working days.
- 10 Contractors on-site on any one day driving light duty diesel trucks. Assume two heavy duty trucks for material and equipment hauling.
- Average round trip is 60 miles/day, and it was assumed that all vehicles would be 2017 model.
- Assumed heavy duty diesel truck low altitude type 2b and light duty diesel truck low altitude type 3/4.

Source: Emission factors and methodology from Air Emissions Factor Guide to Air Force Mobile Sources, December 2013, Section 5, Table 5-13.

Total Air Emissions: Adhesives and Paints

Total Parking Lot Painted Area (sf)	55,000
Wall + Ceiling Area (sf)	1,000
Carpeted Area (sf)	100

Asphalt parking lot area (sq. ft)	**55,000**
Gravel parking lot area (sq. ft)	**0**
Paint coverage - (sq. ft/gal)	350
Gallons of paint	314
VOC content paint (lb/gal)	1.25
VOCs from paint (lb)	**393.0**
Wall area (sq. ft)	**1,000**
Paint coverage - (sq. ft/gal)	350
Primer coverage - (sq. ft/gal)	150
Gallons of paint	5.71
Gallons of primer	6.67
VOC content paint (lb/gal)	1.25
VOC content primer (lb/gal)	1.67
VOCs from paint (lb)	**7.1**
VOCs from primer (lb)	**11.1**
Carpeted area (sq. ft)	***100***
Adhesive coverage (sq. ft/gal)	125
Gallons adhesive	1
VOC content adhesive (lb/gal)	0.33
VOCs from adhesive (lb)	**0.27**
Total VOCs (lbs/yr)	**411.5**
Total VOCs (tons/yr)	**0.206**

Assumptions:
2 coats of paint
1 coat of primer
USEPA, Calculating Emissions from Coating and Painting Operations. 2014

Total Air Emissions: Asphalt Paving Activities

E = area paved x 2.62 lb VOC/acre

A sample calculation is provided below:

Paved area = 1.26 acres

E = (1.26 acres) x (2.62 lb VOC/acre) / (2000 lb/ton)

= 0.002 ton

Paved Acres	LB VOC/Acre	Total VOC (lb)	Total VOC (tons)
1.2628	2.62	3.31	0.002

Reference

California Air Pollution Control Officers Association (CAPCOA), Appendix A-Calculation Details for CalEEMod, 2017.

Total Air Emissions: Fugitive Dust from Land Disturbance

Description:			Total	Hangar	Parking
Total square feet of land disturbed:	355,000	Ft2	355000	300000	55000
Total acres of land disturbed:	8.15	acres	8.1508	6.888	1.2628
Assumed number of 8-hr days:	240				
Assumed equivalent acres/day:	0.03396				

Equation for Fugitive Dust Emissions (PM_{10})

E_{TSP} (lb/yr) = 80 * No. of 8-hr days * Acres/day

E_{PM10} (lb/yr) = E_{TSP} * 0.45

Calculation

E_{TSP} (lb/yr) = 80 * 360 days * 0.002 acres/day

E_{TSP} = 652.06 lb/yr

0.326 tpy

$E_{PM2.5}$ (lb/yr) = E_{TSP} * 0.45

$E_{P2.5}$ = 293.43 lb/yr

0.147 tpy

Source of Equation

Air Emissions Factor Guide to Air Force Stationary Sources, December 2009, Section 16.

E.3 Record of Non-Applicability

RECORD OF NON-APPLICABILITY

Davison Army Airfield (DAAF)
Area Development Plan (ADP)
Fort Belvoir, Fairfax County, Virginia

11 March 2021

Pursuant to Section 176 of the Clean Air Act, 40 Code of Federal Regulations Part 93, Subpart B, and Virginia Administrative Code Part 10.1 thru 1308, this document evaluates a Military District of Washington (MDW) Proposed Action for **General Conformity** with respect to the following regional air quality plans for the Washington, DC-MD-VA metropolitan area:

- *State Implementation Plan for 8-Hour Ozone (O_3) Standard* (2015)
- *State Implementation Plan for Fine Particle ($PM_{2.5}$) Standard* (2008)

The Proposed Action is to implement the construction, modernization, demolition, and infrastructure improvement projects identified in the Area Development Plan (ADP) for Davison Army Airfield (DAAF) at US Army Garrison Fort Belvoir (Fort Belvoir) in Fairfax County, Virginia. The proposed ADP projects include upgrading and replacing an aging, undersized, inadequate, and inefficiently laid out physical infrastructure to allow DAAF to fully support its tenants' ongoing missions and eliminate the temporary waivers under which the airfield is currently operating.

Construction would occur as follows:

DAA Area Development Plan **Start:** Fiscal Year (FY) 2020 **End:** FY 2050

The requirements of the General Conformity Rule are not applicable because:

> The highest total annual direct and indirect emissions from the Proposed Action are estimated at **4.36** tons of volatile organic compounds (**VOCs**); **29.73** tons of nitrogen oxides (**NO_X**); **2.41** tons of sulfur oxides (**SO_X**); and, **2.50** tons of fine **$PM_{2.5}$** per year, below the applicability threshold values of **50** tons per year of **VOCs** and **100** tons per year for **NO_X**, **SO_X**, and **$PM_{2.5}$**, respectively.

Supporting documentation and emission estimates are provided herein.

Proposed Action Exemption

The Proposed Action is located within a nonattainment area; therefore, the Proposed Action is not exempt from the General Conformity Rule. However, per 40 CFR Part 93.153(c), the Proposed Action qualifies as an action where emissions would not exceed applicable *de minimis* thresholds for criteria pollutants (**Table 1**); therefore, is consistent with one of the USEPA's exemption categories. The Proposed Action could result in temporary, less-than-significant impacts on air quality, but would not be expected to change the area's designation with respect to the NAAQS. Therefore, the Proposed Action is exempt from a formal Conformity Determination.

Table 1: Criteria Pollutant Conformity Thresholds

Criteria Pollutant	Conformity Threshold (tons per year [tpy])
VOC	50 tpy
NO_x	100 tpy
SO_x	100 tpy
CO	100 tpy

Table 1: Criteria Pollutant Conformity Thresholds

Criteria Pollutant	Conformity Threshold (tons per year [tpy])
$PM_{2.5}$	100 tpy
Source: 40 CFR 93.153(b)	

RONA Approval

To the best of my knowledge, the information presented in this Record of Non-Applicability (RONA) is correct and accurate and I concur with the finding that the Proposed Action does not require a formal Conformity Determination.

Proponent and Approving Authority – Military District of Washington (MDW)

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Date: 2021.03.12 08:27:56 -05'00'

Date

Brad Hancock, PE, PMP
J/G4, Director of Logistics and Engineering Joint Force Headquarters - National Capital Region & Military District of Washington

Participating Agency and Reviewer – US Army Garrison Fort Belvoir

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Digitally signed by CREASAP.CAROL.MARIE-ERNST.1401964424
Date: 2021.03.12 09:05:05 -05'00'

Date

Reviewer: Directorate of Public Works – Environmental Division

Ms. Carol M. Creasap
Air Program Manager

HARBACK.WILAMENA.G.1390485731
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Date: 2021.03.12 09:12:56 -05'00'

Date

Concurred by: Directorate of Public Works – Environmental Division

Ms. Wilamena G. Harback
Chief, Environmental Division

PROPOSED ACTION

The Proposed Action is to implement the construction, renovation, demolition, and infrastructure improvement projects identified in the DAAF ADP. The Proposed Action does not include, nor would it require, substantial changes in missions, air operations, or the number of aircraft and personnel at DAAF. The proposed projects are organized into short-range (next ten years), mid-range (from 11 to 20 years from now), and long-range (from 21 to 30 years from now) timeframes.

Short-range projects would be implemented over the next ten years. These projects include renovations of multiple existing facilities; the construction of a modern aircraft maintenance hangar for the 12th AV BN; infrastructure improvements; and building demolitions.

Mid-range projects would be implemented over the next 11 to 20 years. These projects primarily consist of facility renovation and construction projects, as well as an infrastructure improvement project. The mid-range projects would complete the build-out of the 12th AV BN complex on the northeast side of the runway and would generally result in substantial reconfiguration of that portion of the airfield.

Long-range projects consist of new facility and infrastructure construction and would be implemented in 21 to 30 years. These projects would also include the demolition of 12 existing buildings.

General Conformity. The General Conformity Rules establish pollutant thresholds used to determine the applicability of conformity requirements for a project. The Proposed Action would occur in Fairfax County, Virginia, part of the National Capital Interstate Air Quality Control Region (AQCR) 47. AQCR 47 is in *marginal non-attainment* for 8-hour O_3 (2015) as established by the National Ambient Air Quality Standards. Therefore, a general conformity applicability analysis of the Proposed Action is required for this criteria pollutant and its pre-cursors (VOCs and NOx). The applicable threshold emission levels include:

- **Ozone** – 50 tons per year (tpy) VOCs and 100 tpy NOx

Accordingly, all direct and indirect emissions were estimated for the construction of the Proposed Action. The Proposed Action would not add any new emission sources or changes in the airfield operations, only renovation and modernization of facilities and infrastructure at DAAF, so no increase in air emissions are expected from the airfield operations. Although there may be increases in sizes of buildings it has been assumed that all additional space heating would be supplied by existing grid power. **Table E-1** summarizes the highest total annual emissions associated with the Proposed Action.

Table E-1: Estimated Emissions for the Proposed Action

Year(s) / Activity(s)	*tons*					
	VOC	**CO**	**NO_X**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
2020 - 2050 / Construct	4.36	13.84	29.73	2.41	2.50	2.50
2025 / Operate [1]	NA	NA	NA	NA	NA	NA
Applicability Threshold	50	n/a [2]	100	100	n/a	100
Above (a) or Below (b)	b	n/a	b	b	n/a	b

1. The Proposed Action would not add any new emission sources or changes in the airfield operations, only renovation and modernization of DAAF facilities and infrastructure, so no increase in air emissions from either operation or employee travel are expected from the airfield operations.
2. n/a = not applicable; Fort Belvoir is outside the Washington, DC-MD-VA maintenance area for CO.

CONSTRUCTION EMISSIONS METHODOLOGY

All direct and indirect emissions associated with the Proposed Action were estimated. The Proposed Action would not add any new emission sources or changes in the airfield operations, only renovation and modernization of DAAF facilities and infrastructure, so no increase in air emissions are expected from the airfield operations. Since the specific schedule (30 years) and the lack of actually programmed projects (with one exception: the 8-Bay Aircraft Maintenance Hangar [Project 6]) assumptions have been made to estimate the air emission for the modernization activities for the Proposed Action based on the square footage of each project and the square footage and emission estimates for a previous RONA analyses for Fort Belvoir (Fort Belvoir, 2017) for all projects except the planned 12th AV BN 8-Bay Aircraft Maintenance Hangar. The emission per square footage was based on a previous RONA prepared for Fort Belvoir – Repair/Alter Building 1189 for RMDA (Fort Belvoir, 2017). The emission factor was applied to the anticipated square footage of all of the proposed ADP projects (except the 12th AV BN 8-Bay Aircraft Maintenance Hangar) to obtain emission estimates for the short-, mid- and long-term projects.

Since a more specific schedule of construction was available for the 12th AV BN 8-Bay Aircraft Maintenance Hangar direct and indirect emissions were estimated based on construction duration, manpower estimates and construction equipment/vehicles. Construction and demolition emissions were estimated for the use of construction equipment (e.g., bulldozers, backhoes), worker and delivery vehicles, the use of VOC paints, paving off-gasses, and fugitive particles from surface disturbances and demolition. The methodology used for the constructed related emissions are described in the following subsections.

Heavy Construction Equipment

Pollutant emissions resulting from activities associated with constructing the proposed buildings, parking facilities, and roadways were estimated. The typical construction would involve such activities as demolition of existing buildings or structures, utility installation, road construction, site clearing and grading, building construction, and asphalt paving.

Construction would involve the use of various non-road equipment, power generators, and trucks. Pieces of equipment to be used for building construction include, but are not limited to, backhoes, loaders, excavators, air compressors, dozers, cranes, pavers, graders, rollers, and heavy trucks. Information regarding the number of pieces and types of construction equipment to be used on the project, the schedule for deployment of equipment (monthly and annually), and the approximate daily operating time (including power level or usage factor) were estimated assuming a construction schedule of one year for the 8-Bay Aircraft Maintenance Hangar.

Emissions from construction activities were estimated based on the projected construction activity schedule, the number of vehicles/pieces of equipment, and vehicle/equipment utilization rates. Emission factors for heavy-duty diesel equipment were obtained Air Emissions Guide for Air Force Mobile Sources, U.S. Air Force Installations (Air Force Civil Engineer Center, 2013). The equipment and vehicle operation hours were estimated based similar construction projects.

Emissions from the heavy construction equipment were estimated using the average rated HP of the engine, the equipment load factor, the engine emission factor and the number of hours the engine is operated. The average rated HP of the engine was obtained from Nonroad Engine and Vehicle Emission Study (USEPA, 1991).

The following formula was used to calculate hourly emissions from non-road engine sources, including heavy construction equipment.

Emission = Horsepower x Load Factor x Emission Factor x Operating Hours

An example emission calculation for CO emissions from an Asphalt Paver is:

E CO Asphalt Pavers = (91 HP) x (0.59) x (4.76 lb/1000 HP-hr) x (200 hrs)

E CO Asphalt Pavers = 51 lbs

Construction Worker and Delivery Truck Vehicles

Emissions due to construction worker (light duty) and delivery truck (heavy duty) vehicles were included in the analysis. Emission factors for the motor vehicles were conservatively calculated using the Air Emissions Factor Guide to Air Force Mobile Sources Installations (Air Force Civil Engineer Center, 2013). These emission factors were then multiplied by the vehicle operational hours to determine motor vehicle emissions. The analysis assumed conservatively that the worker's vehicle would drive 30 miles per day at an average speed of 35 miles per hour.

An example emission calculation for CO emissions from the light duty vehicles is:

E CO =VMT (miles) x EF (gm/mile)
VMT = (Daily miles) x (No of Days per year)
VMT = (60) x (240)
EF CO = (0.57)

E CO = (60 miles) x (240 days) x (0.57 gm/mile) /(453 gm/lb)
E CO = 18.1 lbs

Emissions from Adhesive and Paints

VOC emissions from Adhesive and Paints, primarily parking lot line painting, carpeting and wall painting activities were estimated an assumed 0.33 pounds of VOC per gallon applies for carpet adhesive and 1.25 pounds of VOC emission per gallon of paint applied. Two coats of paint are applied. The following formula was used to calculate emissions from the painting of the parking lot and buildings:

$E =$ $[(F \times G) / 1000] \times H$

where: E = emissions of VOCs from architectural coatings [tons]
F = pounds of VOC emissions per gallon [lbs.]
G = total area to be coated (floor area x 2) [ft^2]
H = paint coverage

An example emission calculation for parking lot line coating VOC is provided below:

Parking Lot = 55,000 ft^2

E = [(1.25 lb/gallon) x [(55,000 ft^2) /(350 ft^2/gallon of paint) x 2)] /2,000 lb/ton

= 0.196 tons

Asphalt Curing Emissions

Asphalt paving would generate emissions from (1) asphalt curing, (2) operation of onsite paving equipment, and (3) operation of motor vehicles (both delivery trucks and worker commuting vehicles). Because the emissions resulting from the operation of onsite paving equipment, trucks, and vehicles were included in the previously, only asphalt curing-related emissions are discussed in this section. Asphalt curing-related VOC emissions were calculated based on the amount of paving for the onsite parking lot for the 8-Bay Aircraft Maintenance Hangar. The following assumption was used in VOC emission calculations for asphalt curing (CAPCOA, 2017):

E = area paved x 2.62 lb VOC/acre

An example emission calculation is provided below:

Paved area = 1.26 acres

E = (1.26 acres) x (2.62 lb VOC/acre) / (2000 lb/ton)

= 0.002 ton

Surface Disturbance

The quantity of dust emissions from construction operations is proportional to the area of land being worked and to the level of construction activity. The following assumptions were used in $PM_{2.5}$ emission calculations for fugitive dust emissions (AFCEE, 2009):

E_{TSP} (tons/yr) = 80 x (No. of 8-hr days) x (Acres/day) /(2000lbs/ton)
$E_{PM2.5}$ (tons/yr) = E_{TSP} * 0.45

An example emission calculation is provided below:

Disturbed area = 80 acres
E_{TSP} (tons/yr) = 80 x (360) x (0.023 Acres/day) /(2000 lbs/ton)
E_{TSP} (tons/yr) = 0.326
$E_{PM2.5}$ (tons/yr) = 0.147

Demolition Activities

Demolition of the existing facilities are planned as part of the short-, mid- and long-term projects but the schedule and activities associated are unknown at this time. Demolition activities would generate combustion and fugitive dust emissions similar to those described above for construction activities. Best management practices would be used to minimize fugitive dust emissions. Based on a review of the equipment expected during the demolition phase, emissions during this phase are expected to be lower than emissions during the construction phase. As a conservative assumption (i.e., higher pollutant emission) it has been assumed that demolition activities would have the same level of combustion emission as construction equipment and particulate emissions as surface disturbance.

OPERATIONAL EMISSIONS

The Proposed Action would not add any new emission sources or changes in the airfield operations, only renovation and modernization of DAAF facilities and infrastructure, so no increase in air emissions from either operation or employee travel are expected from the airfield operations. Although there may be increases in sizes of buildings it has been assumed that all additional space heating would be supplied by existing grid power.

REFERENCES

Air Force Civil Engineer Center (AFCEC), Air Emissions Guide for Air Force Mobile Sources, Methods for Estimating Emissions of Air Pollutants For Mobile Sources at U.S. Air Force Installations, 2013.

Air Force Civil Engineer Center (AFCEC), Air Emissions Factor Guide to Air Force Stationary Sources, Methods for Estimating Emissions of Air Pollutants For Stationary Sources at U.S. Air Force Installations, 2009.

California Air Pollution Control Officers Association (CAPCOA), Appendix A-Calculation Details for CalEEMod, 2017.

Fort Belvoir – Repair/Alter Building 1189 for RMDA, 2017

United States Environmental Protection Agency (USEPA), Calculating Emissions from Coating and Painting Operations. Fact Sheet. Office of Compliance Assistance and Pollution Prevention, 2014

United States Environmental Protection Agency (USEPA), Nonroad Engine and Vehicle Emission Study Report, 1991.

Appendix F – Finding of No Practicable Alternative (FONPA)

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DEPARTMENT OF DEFENSE

UNITED STATES ARMY

FINDING OF NO PRACTICABLE ALTERNATIVE FOR DAVISON ARMY AIRFIELD AREA DEVELOPMENT PLAN AT US ARMY GARRISON FORT BELVOIR, VIRGINIA

1.0 Introduction

Davison Army Airfield (DAAF) is situated on approximately 673 acres of land on United States (US) Army Garrison Fort Belvoir (Fort Belvoir) in Fairfax County, Virginia, about 13 miles south of Washington, D.C. The airfield itself covers nearly 350 acres therein and provides aviation support for federal activities, including Fort Belvoir tenants and leadership. Due to its location within the National Capital Region (NCR), DAAF is also an important logistical asset for the Army and Department of Defense (DoD). Approximately 50 aircraft are permanently assigned to DAAF to support training and operations.

The Army proposes to implement construction, modernization, demolition, and infrastructure improvement projects identified in the Area Development Plan (ADP) for DAAF (Proposed Action). The Army determined that elements of the Proposed Action must be located within portions of the 100-year floodplain and wetlands on DAAF. Under Executive Order (EO) 11988, *Floodplain Management*, the Army must find that there is no practicable alternative to development within the 100-year floodplain. Under EO 11990, *Protection of Wetlands,* federal agencies must avoid undertaking new construction located in wetlands unless the head of the agency finds that there is no practicable alternative to such construction. Further, the Army must take all practicable measures to minimize harm to or within floodplains and wetlands.

This finding incorporates the analysis and conclusions of the November 2020 *Davison Army Airfield Area Development Plan Final Environmental Impact Statement* (EIS). In accordance with EOs 11988 and 11990, the Draft Finding of No Practicable Alternative (FONPA) was made available during the 45-day Draft EIS public review and comment period. No comments requiring changes to the Draft FONPA were received during the Draft EIS public review period.

2.0 Notice of Floodplain and Wetland Involvement

EO 11988 requires federal agencies to determine whether a proposed action would occur within a floodplain and to avoid floodplains to the maximum extent possible when there is a practicable alternative. The 100-year floodplain is defined as an area adjacent to a water body that has a 1 percent or greater chance of inundation in any given year. The Army has determined that certain facilities and infrastructure proposed in the ADP necessitate development in the 100-year floodplain on DAAF.

EO 11990 requires that each federal agency, to the extent permitted by law, “shall avoid undertaking or providing assistance for new construction located in wetlands unless the head of the agency finds: (1) that there is no practicable alternative to such construction; and, (2) that the proposed action includes all practicable measures to minimize harm to wetlands which may result from such use.” The term "wetlands" means “those areas that are inundated by surface or ground water with a frequency sufficient to support and under normal circumstances does or would support a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction.”

Several of the proposed ADP projects would be constructed in the 100-year floodplain and wetlands associated with Accotink Creek on DAAF (**Figures 1** through **4**). Development can impact these natural resources via the loss or degradation of their natural functional benefits such as water storage, infiltration, and filtration. These impacts extend to the intrinsic value of these resources or the benefits associated with their use, such as wildlife habitat, recreation, and aesthetic enjoyment. Floodplain and wetland functions and values are also susceptible to changes in the volume, rate, and quality of stormwater discharge, particularly as influenced by the amount of impervious surface within a watershed.

A Notice of Availability (NOA) was published in the *Federal Register* on July 24, 2020 announcing the availability of the Draft EIS and Draft FONPA for a 45-day public review and comment period that began on July 24 and ended on September 8, 2020. Electronic copies of the Draft EIS and Draft FONPA were available for public review and

download on Fort Belvoir's website for the duration of the 45-day review period. Opportunities for public comment on the Draft EIS and Draft FONPA were provided during two publicly accessible teleconferences that were conducted for the Draft EIS on August 24, 2020. The teleconferences were conducted in accordance with interim Army procedures for compliance with the National Environmental Policy Act (NEPA) during the COVID-19 pandemic dated June 15, 2020.

Two comments on the Draft FONPA were received during the public review period; the subjects of the comments are addressed herein. Neither comment required changes to this FONPA.

3.0 Description of the Proposed Action and Discussion of Alternatives

The Proposed Action is to implement the projects identified in the DAAF ADP. New, modern facilities and infrastructure are needed to support DAAF's aviation mission now and in the future. The ADP projects would modernize airfield facilities and infrastructure, and reconfigure the airfield's layout to ensure operations are safe, efficient, and organized as part of a consolidated aviation complex. The Proposed Action would remove outdated, undersized, and inadequate facilities, including numerous buildings or structures located within Primary and Transitional Surfaces associated with the runway. The buildings located in these areas represent an aviation safety risk and currently operate under temporary safety waivers.

The Proposed Action comprises ADP projects that are organized into three phases of construction: short-range (next ten years), mid-range (from 11 to 20 years from now), and long-range (from 21 to 30 years from now). This phasing reflects the Army's preferred sequence for implementing the projects based upon mission priorities and the need to minimize operational disruptions during implementation of the ADP.

Alternatives Selection Criteria

The practicability of a given alternative is evaluated by considering pertinent factors such as community welfare, environmental impact, and feasibility in light of the overall project purpose and need. The Army developed screening criteria to assess whether an alternative would meet its purpose and need and, therefore, could be considered reasonable. These criteria were used to evaluate a range of reasonable alternatives, as follows:

- Alternatives must constitute a complete, coherent program that adequately accommodates the space and functional needs of all DAAF tenants consistent with applicable DoD requirements and the airfield's mission.
- Alternatives may allow for only partial implementation of the ADP projects to recognize uncertain funding and changing priorities over a 30-year planning horizon, but must not preclude their potential full implementation.
- Alternatives must remove existing facilities in the airfield Primary and Transitional Surfaces that require temporary waivers for their continued operation.

Alternatives Considered and Dismissed

The Army considered alternatives that would accommodate the requirements of DAAF's tenants by relocating all or some of them to adequately sized facilities at other DoD installations within the NCR. Because the missions of DAAF's tenants are specific to their location in the NCR, relocating them to installations outside the region was not considered practicable. It was further determined that space sufficient to accommodate DAAF tenants, fully or partially, consistent with their missions at a single installation elsewhere in the NCR would not be possible.

During development of the ADP, the Army also considered several alternate site plans for development on DAAF. These alternatives considered the timing, scope, intensity, and distribution of the proposed facilities and infrastructure. The primary factor in siting the proposed ADP projects on the airfield was the need to consolidate the 12th Aviation Battalion (12th AV BN) in a single location. This siting decision also determined where and how other tenant activities on DAAF could be accommodated. Another determining factor was to eliminate obstructions of airfield safety surfaces that require temporary waivers for the operation of multiple facilities near the runway.

Due to the various physical and natural constraints on the airfield, options to consolidate the 12th AV BN in one location in proximity to the runway were limited. The Army considered the southwestern corner of the airfield as a potential option. To avoid siting new facilities in violation of operational safety criteria, this option would have required extensive excavation due to the hilly terrain. Additionally, the land area necessary to support this option was generally limited and would have brought airfield operations substantially closer to an adjacent residential community. An area along the flight line to the northeast was also considered for consolidation of the 12th AV BN; however, this option would not allow the Army to accommodate the needs of DAAF's other tenant activities.

Alternatives Subject to Further Analysis

Based on the selection criteria, two action alternatives were selected for more detailed analysis: the Full Implementation Alternative and the Partial Implementation Alternative. A No Action Alternative was also included.

No Action Alternative

Under the No Action Alternative, the DAAF ADP would not be adopted and existing conditions at the airfield would continue for the foreseeable future. None of the proposed construction, modernization, demolition, and infrastructure improvement projects would occur. Facilities within the airfield's Primary and Transitional Surfaces would continue to operate under multiple temporary operational safety waivers. The No Action Alternative did not meet the screening criteria developed by the Army, but was carried forward for analysis in the EIS in accordance with NEPA requirements to provide a baseline against which impacts of the Full and Partial Implementation Alternatives could be measured. Because it does not meet the Proposed Action's purpose and need, this alternative is not "practicable" within the meaning of EOs 11988 and 11990.

Full Implementation Alternative

The Full Implementation Alternative would implement the complete suite of projects identified in the DAAF ADP. It would demolish up to 37 existing buildings and structures on DAAF, removing facilities determined to be unnecessary, inadequate, or redundant. This Alternative would include the demolition of all facilities currently within the Primary and Transitional Surfaces that require temporary safety waivers to operate. The Full Implementation Alternative would accommodate the space and functional needs of all DAAF tenants consistent with applicable DoD requirements. It would also fulfill DAAF's vision to create a safe, secure, sustainable, and consolidated aviation complex. This alternative meets the Proposed Action's purpose and need. It is the only practicable alternative within the meaning of EOs 11988 and 11990.

Partial Implementation Alternative

The Partial Implementation Alternative would implement a modified, reduced program of ADP projects at DAAF. This Alternative would amount to implementing all of the short-range projects and most of the mid-range projects; none of the long-range projects would be implemented under this Alternative. Up to 24 existing buildings and structures at DAAF would be demolished by the Partial Implementation Alternative, including all but two of the buildings within the Primary and Transitional Surfaces requiring temporary waivers to operate. The Partial Implementation Alternative would not address DAAF's tenants' requirements in full, but would substantially improve conditions and help to fulfill DAAF's vision to create a safe, secure, sustainable, and consolidated aviation complex. Since this alternative would continue to require temporary safety waivers for some facilities, the full set of projects would ultimately have to be completed to enable the safe operation of DAAF. For purposes of floodplain and wetland impacts, this result would be the same as in the Full Implementation Alternative. For these reasons, the Partial Implementation Alternative does not represent a practicable alternative within the meaning of EOs 11988 and 11990.

Impacts and Mitigation Measures

Selection of the Full Implementation Alternative would permanently affect approximately 7.5 acres of floodplains on DAAF; up to 31 acres of floodplains may be subject to temporary, construction-related effects. Potential downstream flooding effects under this Alternative would generally be limited to areas of Fort Belvoir in a conservation status. The horizontal extent of the floodplains on the airfield would not increase more than 2 feet under the Full Implementation

Alternative. The Alternative would also permanently affect approximately 1.1 acres of wetlands on DAAF; up to 2.5 acres of wetlands may be subject to temporary, construction-related effects.

EO 11988 states that if the only practicable alternative requires siting in a floodplain, the agency shall, prior to taking action, design or modify its action to minimize potential harm to or within the floodplain. Under the Proposed Action, Best Management Practices (BMPs) and Low Impact Development (LID) measures would be implemented to reduce the potential for adverse impacts on the 100-year floodplain and areas downstream. For instance, critical elements of the proposed buildings would be raised above the level of the 100-year floodplain and carefully selected fill soils would be placed and compacted to situate buildings above base flood elevation.

EO 11990 requires that the proposed action include "all practicable measures to minimize harm to wetland[s]." Prior to implementing projects impacting wetlands, the construction contractor would obtain applicable permits/approvals from the US Army Corps of Engineers, Virginia Marine Resources Commission (VMRC), Virginia Department of Environmental Quality (VDEQ), and/or Fairfax County Wetlands Board in accordance with the Clean Water Act. Adherence to avoidance, mitigation, and compensation measures specified in the permits would be required. These include all practicable measures available to ensure that wetland impacts are mitigated to the extent possible.

There are some areas on DAAF where floodplains and wetlands overlap one another. As such, other BMPs and LID measures are incorporated into the Proposed Action to avoid or minimize impacts on these resources and are collectively described, as follows:

- Where appropriate, retaining walls would be employed to reduce the size of building footprints that would otherwise result in the permanent loss of floodplains or wetlands. For instance, building a retaining wall the length of an Aircraft Storage Hangar (Project 11 in the Full Implementation Alternative) would reduce the disturbed area by approximately 9,500 square feet.
- Where appropriate, subsurface infiltration beds would provide temporary storage and infiltration of stormwater by placing storage media of varying types beneath the proposed surface grade. Subsurface infiltration beds generally consist of vegetated, highly pervious soil media underlain by a uniformly graded bed to capture and temporarily retain stormwater runoff. This allows stormwater from impervious areas such as rooftops, parking lots, and roads to be conveyed to the subsurface storage media and distributed via a network of perforated piping. Incorporating these infiltration features into building designs can result in year-round (below the frost line) benefits in terms of stormwater runoff volume, rate, and quality control. For instance, the design of an Aircraft Maintenance Hangar (Project 6 in the Full Implementation Alternative) includes infiltration beds along three sides of the facility.
- Other features such as erosion and sediment controls during construction and grading post-development (e.g., berm establishment) would function to capture or re-direct stormwater flows for infiltration or evapo-transportation on-site. Vegetated retention and detention features would also be included in site plans and designs for this purpose.
- The design of the Proposed Action would minimize new impervious areas associated with parking areas, pavements, and roads. Where feasible, permeable pavement and other appropriate design features will be incorporated during the design phase. For instance, construction access and staging areas would utilize existing paved areas on DAAF to the extent practicable. Additional LID measures to minimize adverse effects of imperviousness on DAAF could include the use of permeable pavement for privately-owned vehicle (POV) parking lots and infiltration-filter designs to filter runoff generated from aircraft parking aprons.
- Adherence to Fort Belvoir's *Guide for Resource Protection Areas (RPAs) and Stream Buffers* (21 September 2016) would help to offset permanent and temporary impacts on riparian buffer zones established to preserve water quality and provide flood and erosion control on the installation. RPAs reduce the velocity and volume of storm and flood waters by encouraging their retention in the soil, allowing sediment and attached nutrients and toxins to filter out and settle. Permanent loss of these areas on DAAF would require mitigation in the form of RPA plantings on-site or buffer enhancement elsewhere on Fort

Belvoir. Vegetation replacement rates would be as recommended by the Virginia Department of Conservation and Recreation *Riparian Buffers Modification and Mitigation Guidance Manual* (2006).

Taken together, these and other yet to be determined BMPs and mitigation measures would avoid or minimize the loss of and impacts on floodplains and wetlands at DAAF under the Proposed Action. These measures represent all practicable measures to minimize harm to floodplains and wetlands.

4.0 Finding

During development of the ADP, the Army sought ways to site the needed facilities entirely outside of floodplains and wetlands while still addressing the requirements of DAAF's tenants and operational safety requirements. Due to mission-related factors, such as lack of developable space and compliance with airfield operational safety criteria, it was determined that avoidance of floodplains and wetlands was not feasible. The Partial Implementation Alternative would postpone but not eliminate the requirement to ultimately build all the projects in the ADP to meet the Proposed Action's purpose and need. Therefore, this alternative does not represent a practicable alternative to developing within floodplains and wetlands. Alternatives that would entirely avoid developing in floodplains and wetlands were also eliminated from consideration, for the reasons discussed above. As such, the Army has determined there are no practicable alternatives to avoiding development within floodplains and wetlands on DAAF.

Following a thorough evaluation of alternate plans that would satisfy the Proposed Action's purpose and need, I find that there is no practicable alternative to siting elements of the Proposed Action entirely outside of floodplains and wetlands. Therefore, the Army will ensure that all practicable measures to minimize impacts to and within the floodplain environment, and to minimize harm to wetlands, are incorporated into the Proposed Action.

Date

Ms. Carla Coulson
Deputy Assistant Secretary of the Army
Installations, Housing & Partnerships

Attachments: Figure 1: Full Implementation Alternative – Proposed ADP Project Footprints and 100-Year Floodplain at DAAF

Figure 2: Partial Implementation Alternative – Proposed ADP Project Footprints and 100-Year Floodplain at DAAF

Figure 3: Full Implementation Alternative – Proposed ADP Project Footprints and Wetlands at DAAF

Figure 4: Partial Implementation Alternative – Proposed ADP Project Footprints and Wetlands at DAAF

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Figure 1: Full Implementation Alternative – Proposed ADP Project Locations and 100-Year Floodplain at DAAF

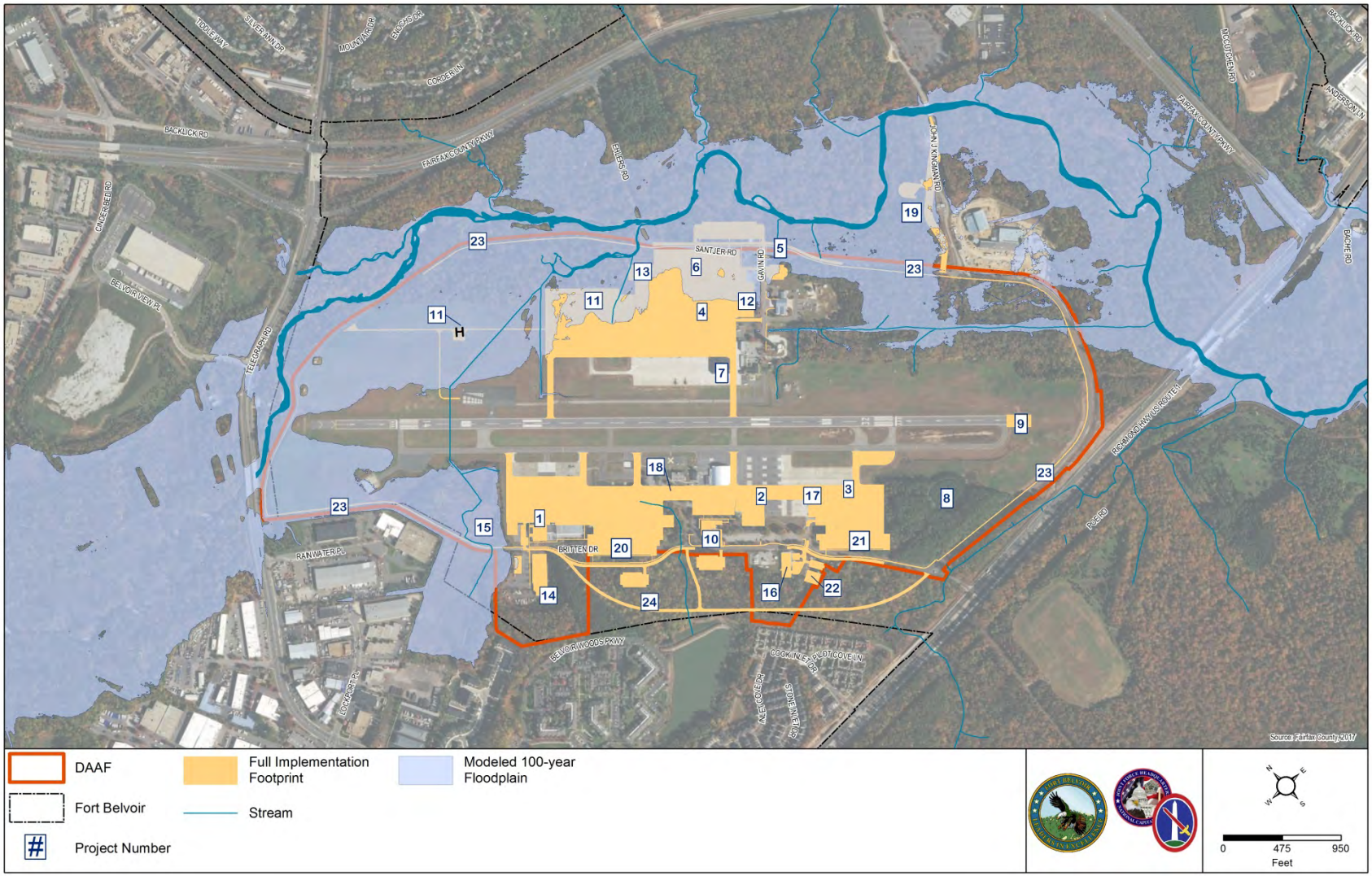


Figure 2: Partial Implementation Alternative – Proposed ADP Project Locations and 100-Year Floodplain at DAAF

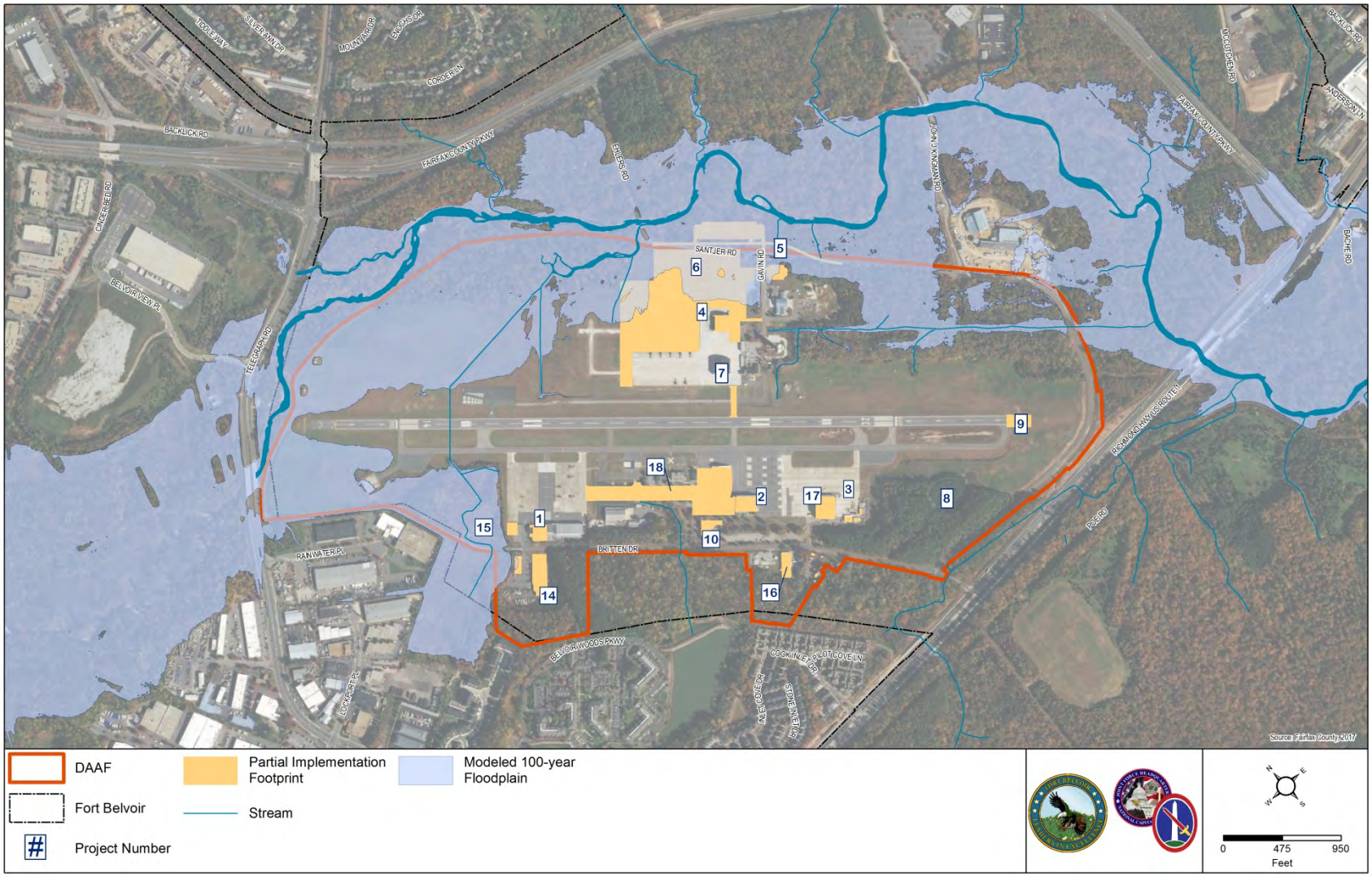


Figure 3: Full Implementation Alternative – Proposed ADP Project Locations and Wetlands at DAAF

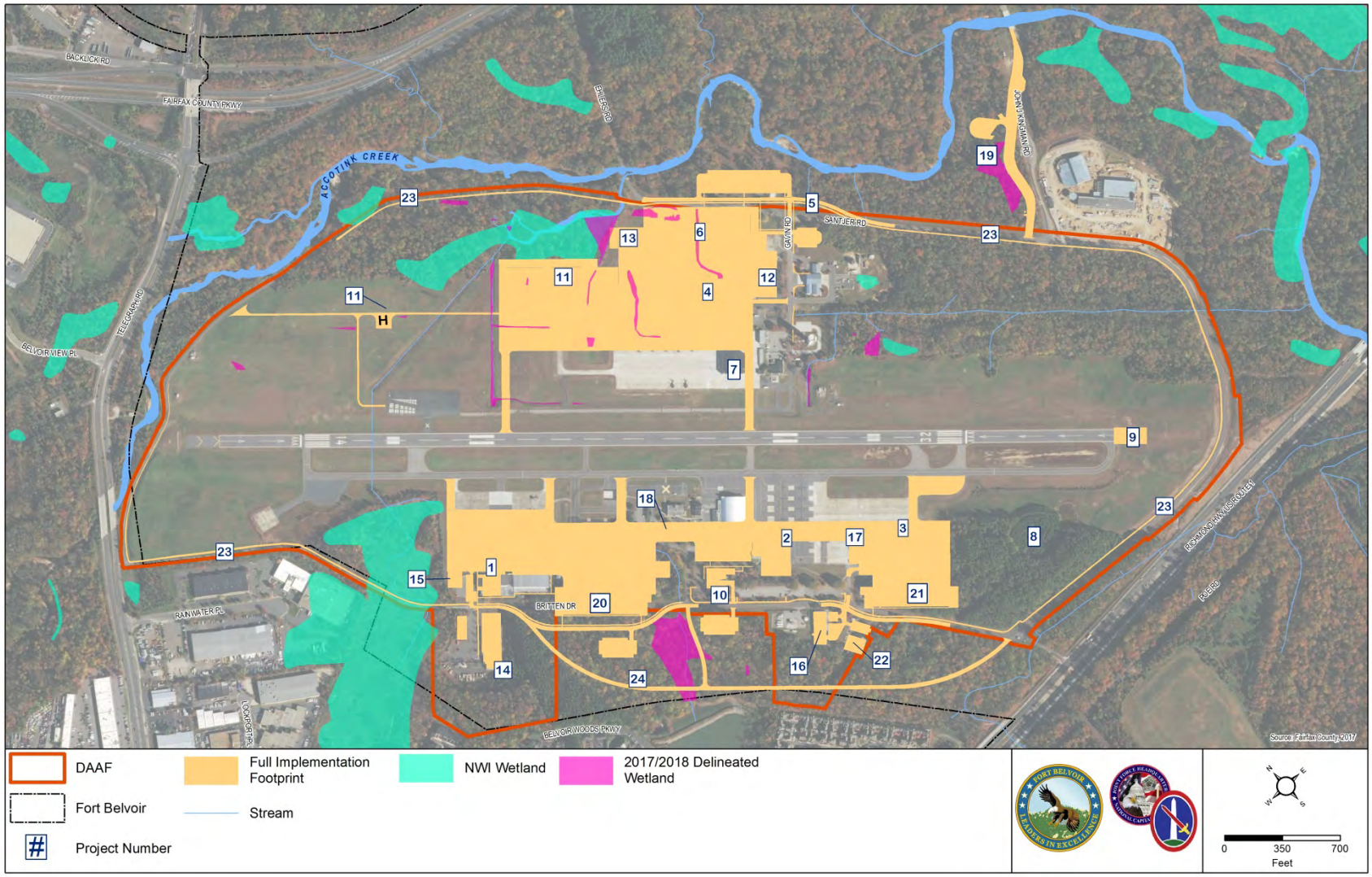
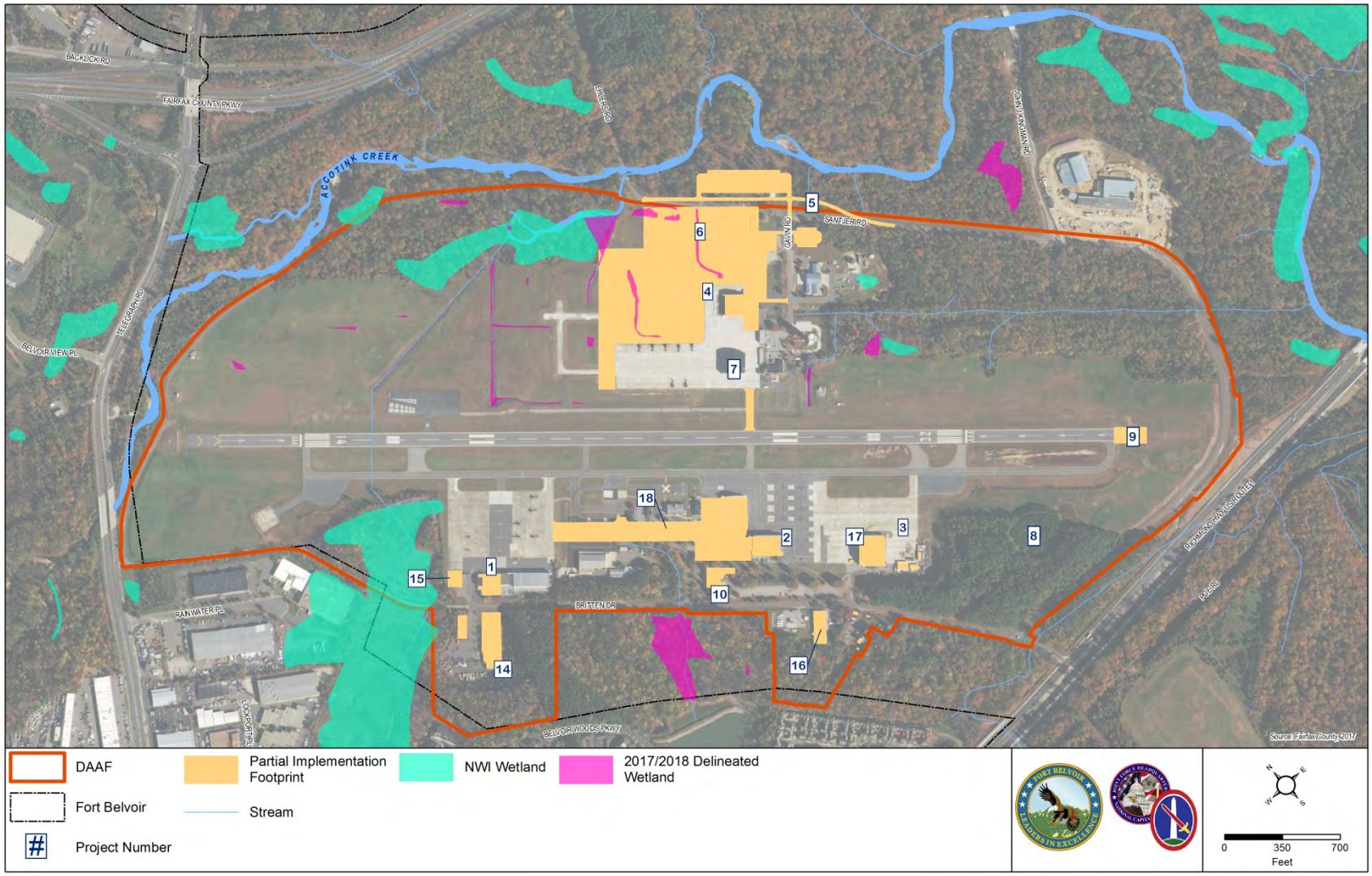


Figure 4. Partial Implementation Alternative – Proposed ADP Project Locations and Wetlands at DAAF



DEPARTMENT OF THE ARMY
OFFICE OF THE ASSISTANT SECRETARY OF THE ARMY
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SAIE-IHP

MEMORANDUM FOR

Commanding Colonel (IMBV-PW), Headquarters, United States Army Garrison, Fort Belvoir, 9120 Flagler Road, Suite 213, Fort Belvoir, VA 22060-5928
U.S. Army Materiel Command G4 Deputy (AMIL), 4400 Martin Road, Redstone Arsenal, AL 35898-5000
U.S. Installation Management Command G4 Director (AMIM-PW/Mr. Gregory S. Kuhr), 2405 Gun Shed Rd. Building 2261, JBSA Fort Sam Houston, TX 78234-1403
U.S. Army Installation Management Command Directorate Sustainment, Mr. Davis D. Tindoll Jr.), 4400 Martin Road, Room A35E040, Redstone Arsenal, AL 35898

SUBJECT: Request for Approval for a Finding of No Practicable Alternative (FONPA) to implement the Davison Army Airfield (DAAF) Area Development Plan (ADP) In Known Wetlands and Floodplains at US Army Garrison Fort Belvoir, VA

1. Reference IMBV-PW memorandum, dated 11 Mar 2021, Subject: Request for Approval under Executive Order (EO) 11988 and EO 11990 to Implement the Davison Army Airfield (DAAF) Area Development Plan (ADP) In Known Wetlands and Floodplains at U.S. Army Garrison Fort Belvoir, VA.

2. As requested in referenced memorandum, the FONPA to implement the DAAF ADP at U.S. Army Garrison Fort Belvoir, VA is approved.

3. The points of contact for this action are Ms. Denise Faldowski, ODASA (IH&P), at denise.m.faldowski.civ@army.mil and Ms. Andrea Pahlevanpour, ODCS, G-9, at andrea.pahlevanpour.civ@army.mil.

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CARLA K. COULSON
Deputy Assistant Secretary of the Army
(Installations, Housing, and Partnerships)

CF:
DCS, G-9 (DAIN-ISE)