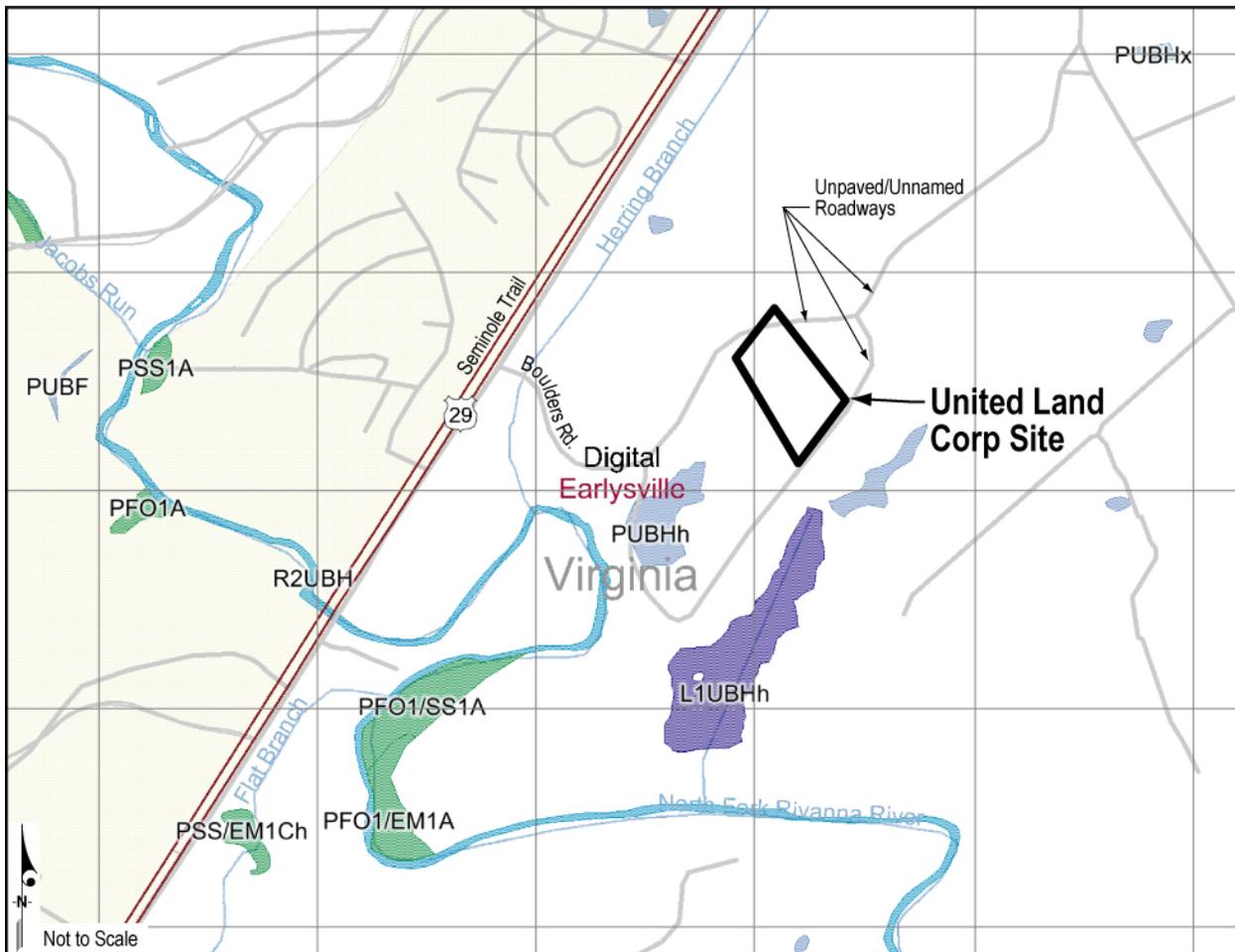


Figure 3: FEMA Flood Insurance Rate Map, 2005

...Executive Order 11990 (Protection of wetlands):

No. According to the U.S. Fish and Wildlife Service (FWS) online National Wetland Inventory (NWI) Digital Data, there are no wetland areas located within the proposed property boundary. The nearest wetlands include two areas south of the proposed site. One is a manmade wetland identified as PUBHh (Palustrine unconsolidated bottom, permanently flooded dike/impounded). This area was identified by Mr. Wood as a stormwater management pond for the existing NGIC building. The second wetland area is identified as L1UBHh (Lacustrine Limnetic unconsolidated bottom, permanently flooded dike/impounded). No wetlands on or near the project site would be affected by the proposed action.



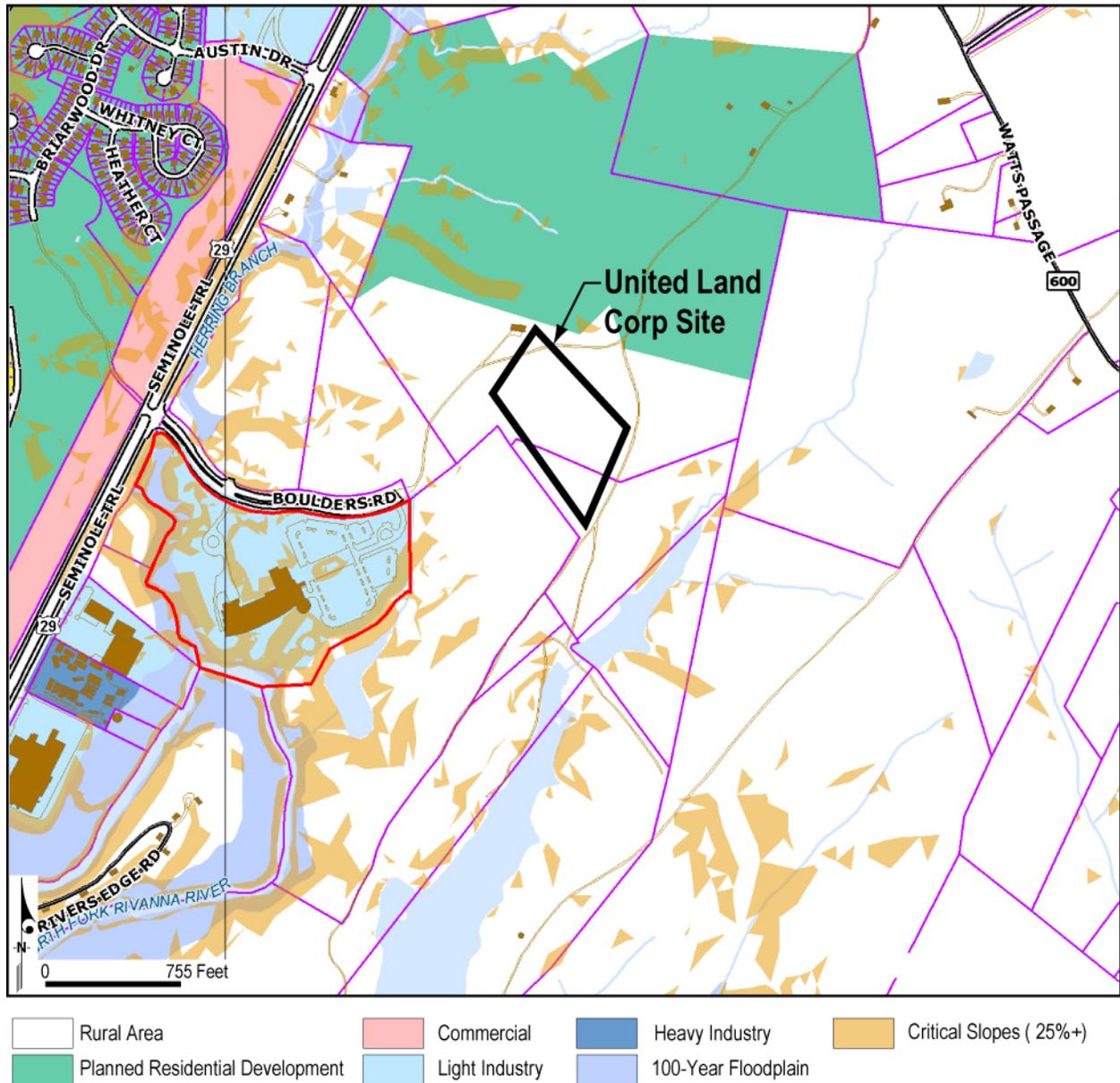
**Figure 4: National Wetland Inventory Map, 2007**

...Executive Order 12072 (Development in central business areas):

No. The proposed location is not within the central business district of downtown/historic Charlottesville, Virginia. The central business district for the Albemarle County/Charlottesville area is located within the incorporated City of Charlottesville in the historic district, which is located approximately 9 miles south-southeast of the United Land Corp site. No properties within the central business district were offered to GSA.

## CATEX Checklist Supporting Information

According to the Albemarle County Code, the proposed site is zoned RA (Rural Area). Chapter 18 Section 10 of the County Code states the RA zoning allows for a wide variety of uses to include, but not limited to, single-family dwellings, agriculture/forestry uses game preserves, parks, playgrounds, community centers, water distribution and sewer facilities, public use uses and buildings. Under the “public uses” designation, office buildings “funded, owned or operated by local, state or federal agencies” are allowed in areas zoned as RA (County of Albemarle, 2007). The proposed action is consistent with this zoning.



**Figure 5: County of Albemarle, Virginia Zoning Map, 2007**

...Executive Order 13006 (Priority use of historic properties):

No. No historic properties that would meet the needs of the proposed project were offered to GSA.

...A State's Coastal Zone Management (CZM) Plan:

No. This parcel is not located within Virginia's Coastal Zone Area.

...Applicable state, Indian tribal, or local environmental protection, historic preservation, noise control, visual impact, or social impact control ordinances:

No. Because the project is a lease/construction project, the developer would be required to comply with all applicable state and local laws and regulations.

**Checklist Question B:**

**Is the action likely to have results that are inconsistent with locally desired social, economic, or other environmental conditions?**

Is the action likely to:

...Change traffic patterns or increase traffic volumes:

No. The existing NGIC facility is located approximately 5,000 feet from the proposed site, along Boulders Road. No additional vehicle trips during peak hours are expected as there would be no increase in the number of employees over existing conditions. A signal-regulated traffic light is located at the intersection of Boulders Road and Seminole Trail (Route 29). According to Mr. Wood, his development company is planning on extending this intersection west of Seminole Trail in preparation for a new residential development expected to include 350 single-family homes (Personal communication, Wendal Wood, May 16, 2007). The project will begin within 90 days. Due to this proposed residential community, Mr. Wood has obtained the necessary permits and performed the required studies as they relate to increasing the volume of traffic at this intersection.



**Residential expansion site located west of Route 29  
(yellow arrow marks existing NGIC facility)**

...Have access constraints:

No. The site is adjacent to Boulders Road. While the proposed site remains undeveloped, an access road for the current NGIC facility was constructed circa 2003. Access to the proposed site is made by gaining entry to Boulders Road off Seminole Trail heading east. This entrance is located west of the proposed site. According to Mr. Wood, he will extend the existing Boulders Road right-of-way to connect the new parcel for proposed access (Personal communication, Wendal Wood, May 16, 2007).

...Affect a congested intersection:

No. The existing NGIC facility is approximately 5,000 feet from the proposed site. There is a signal-regulated traffic light located at the intersection of Boulders Road and Seminole Trail. The proposed NGIC facility is not expected to affect this intersection as there would be no additional employees commuting to the site over existing conditions. As noted above, Mr. Wood plans to build a residential community on the western side of the intersection of Boulders Road and Route 29 (Personal communication, Wendal Wood, May 16, 2007). According to Mr. Wood, the necessary permits have been obtained to build this road from the County with consideration made to the anticipated influx of additional people to the area as a result (Personal communication, Wendal Wood, May 16, 2007).

...Result in housing workers or others more than one-quarter of a mile from public transit:

No. Several different modes of transportation are available to NGIC employees. The Virginia Department of Rail and Public Transportation offers the following programs that

would be useful for commuting employees: Green County Transit (GCT), Jaunt, Inc. (Jaunt), RideShare, and VPSI, Inc. (VPSI).

GCT and Jaunt offer pickup and drop off services at any time to any location within the designated area (Albemarle County is included in the coverage area). GCT services are available Monday through Saturday and Jaunt services are available every day of the week; however, Jaunt services are restricted to those persons eligible under the Americans with Disabilities Act on Saturdays and Sundays. Fees for both services are based on specifics relating to the anticipated trip (i.e., time of day, distance, pickup/drop off locations, etc.).

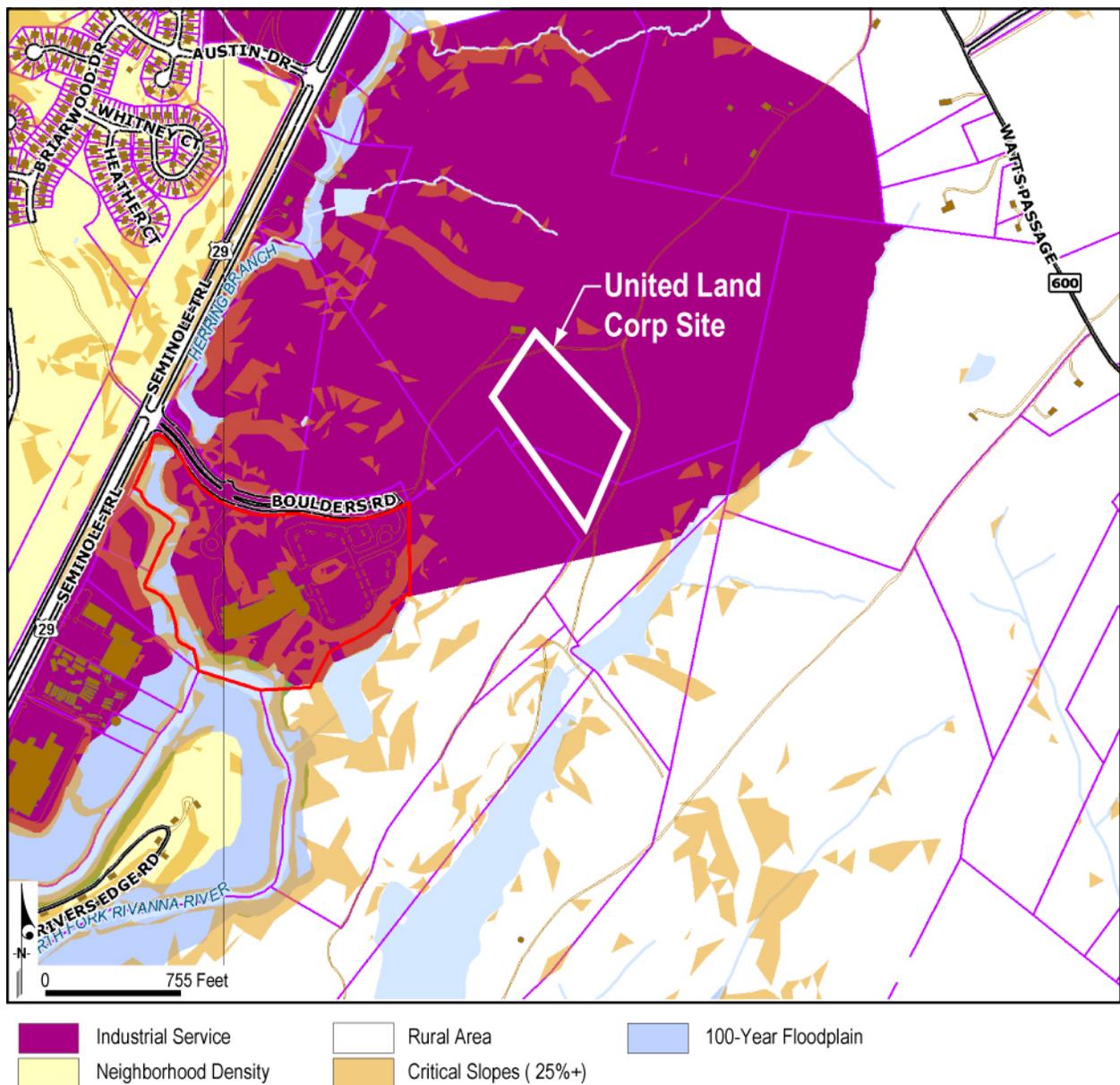
RideShare and VPSI offer various commuter services. RideShare provides a free matching service to commuters traveling in their direction at approximately the same time of day so that they may schedule carpools. RideShare also offers vanpooling services where commuters meet at a designated park and ride location (several are located throughout the County) and drive to work. VPSI offers these same two services as well as a service called carsharing. Carsharing is a service through a company called Zipcar, Inc. (Zipcar) whereby patrons are given a zipcard to access various Zipcar-owned vehicles throughout the County at any time (times must be previously scheduled) for use as a personal vehicle. Prices vary for all services provided but should be confirmed by contacting the designated company.

...Require substantial new utilities:

No. Sewer, water, and other utilities exist for the neighboring NGIC office building as well as the surrounding residential communities. According to Mr. Wood, in 1983 he was required to build a new water and sewer system when the General Electric office building and neighboring residential community were constructed by his company (Personal communication, Wendal Wood, May 16, 2007). This system is capable of handling the requirements of the new NGIC office building as well as the planned residential communities that are proposed for construction in the vicinity (Personal communication, Wendal Wood, May 16, 2007). This system is managed by Albemarle County Service Authority (ACSA) who provides public water and wastewater treatment services to County residents. The ACSA purchases water and wastewater treatment services from the Rivanna Water and Sewer Authority, which operates the water and wastewater treatment plants, reservoirs, and transmissions that serve County customers. Electricity is provided by Virginia Dominion Power Company; telephone services are provided by Central Telephone Company of Virginia (Centel); and natural gas is provided by Charlottesville Gas.

...Be inconsistent with existing zoning, surrounding land use, or the official land use plan for the specific site and/or the affected delineated area:

No. The proposed parcel has been specifically zoned RA (Rural Area) by the County of Albemarle. This zoning allows for a wide variety of uses to include, but not limited to, single-family dwellings, agriculture/forestry uses game preserves, parks, playgrounds, community centers, water distribution and sewer facilities, public uses and buildings. Under the "public uses" designation, office buildings "funded, owned or operated by local, state or federal agencies" are allowed in areas zoned as RA (County of Albemarle). Areas north of the project site are zoned R-1 and R-2 for residential use. Properties south, east and west of the project site are also zoned RA. Farther north of the site, land is zoned PRD (Planned Residential Development), which allows for uses much the same as RA zoning.



**Figure 6: County of Albemarle, Virginia Land Use Map, 2007**

...Be regarded as burdensome by local or regional officials or the public because of infrastructure demands (e.g., sewer, water, utilities, street system, and public transit):

No. The proposed site would be used to building an office building to house employees currently stationed at the existing NGIC facility. No new employees will be hired or otherwise brought in to the County for employment.

...Change the use of parklands:

No. The project site is not located on parkland, nor would the site limit access to or use of area parklands.

...Change the use of prime farmlands:

Yes. Prime farmland soils and soils of statewide importance (Fluvanna silt loam and Elioak loam, respectively) exist on the site (USDA, 2007). Because farmland soils protected under the Farmland Protection Policy Act (FPPA) would be impacted by construction on the United Land Corp Site, Parts I, III, and VI of the Farmland Conversion Impact Rating form (Form AD-1006) were completed. The completed form is attached.

Because the site received a score of less than 60 on Part VI of the Impact Rating Form, the total site assessment score would not exceed 160. Therefore, construction on this site would not require additional coordination under the FPPA.

...Change the use of a floodplain:

No. According to the FEMA Flood Insurance Rate Map 51003C0145D, no portion of the project site is located within or adjacent to either the 100-year or 500-year floodplain. The site is located in Zone X, an area of moderate or minimal hazard from the principal source of flood in the area.

...Alter a wetland:

No. According to the FWS online NWI Digital Data, there are no wetland areas located within the proposed property boundary.

...Be located on or near a wildlife refuge, a designated wilderness, wild and scenic river, a National Natural Landmark, National Historic Landmark, designated open space, or designated conservation area:

No. The project site is not located on or near a wildlife refuge, designated wilderness, a wild and scenic river, National Natural Landmark, designated open space, or designated conservation area. There are no National Historic Landmarks in the immediate vicinity of the project site.

...Be located on or near an area under study for any such designation:

No. The proposed site is not on or near an area under study for such a designation.

...Be located on or near any other environmentally critical area:

No. The lease/construction project would not be located on or near any other environmentally critical areas.

...Have adverse visual, social, atmospheric, traffic, or other effects on such a critical area even though it is NOT located on or near the area:

No. Critical areas do not exist on or near the site.

**Checklist Question C:**

**Is the action likely to result in the use, storage, release and/or disposal of toxic, hazardous, or radioactive materials, or in the exposure of people to such materials?**

**Is the action is likely to:**

...Result in the use, storage, release, and/or disposal of toxic materials such as fertilizers, cleaning solvents, or laboratory wastes, or of hazardous materials such as explosives?

No. The lease/construction of a new NGIC office building would not result in the use, storage, release and/or disposal of laboratory wastes or hazardous materials such as explosives.

...Involve a facility that may contain poly-chlorinated biphenyl (PCB) electric transformers, urea formaldehyde, or friable asbestos:

No. The proposed site is currently undeveloped. No transformers were observed within the property boundary. No PCB-containing transformers, urea formaldehyde or friable asbestos is currently present or anticipated to be installed during the construction of the new office building.

...Be on or near an EPA or State Superfund, or priority cleanup site:

No. According to regulatory database information, there are no EPA or State Superfund or priority cleanup sites located on or near the proposed property.

One site is listed as a Leaking Tanks (LTANKS) facility: Charlottesville-Albemarle Airport. The airport is located at 100 Bowen Loop Road (approximately 1 mile southwest of the site). According to database information, the LTANKS case recorded in January 2003 has been closed and the case recorded in October 2006 remains open. However, due to the airports topographic location and its distance from the proposed property, neither case is anticipated to adversely impact the United Land Corp site.

...Involve construction on or near an active or abandoned toxic, hazardous or radioactive materials generation, storage, transportation, or disposal site:

No. The regulatory database information did not identify any Resource Conservation and Recovery Information System (RCRIS) Small or Large Quantity Generator facilities within a ¼-mile radius of the proposed site. Additionally, regulatory information did not identify any Treatment, Storage or Disposal (TSD) facilities within a ½-mile radius of the proposed site.

...Involve construction on or near a site where remediation of such materials has occurred.

No. No such sites exist on or near the proposed site.

...Involve use of a site that contains underground storage tanks (USTs), as evidenced by historical data or physical evidence such as vent pipes or fill caps.

No. The proposed site is currently undeveloped. During the site visit no evidence of USTs was observed. The existing NGIC office building was constructed in the early 2000's and is heated and cooled via electricity (Personal communication, Wendal Wood, May 16, 2007). It is anticipated that the new NGIC facility would be constructed in the same manner.

...Involve water pipes and/or water supply appurtenances that contain lead in excess of EPA standards.

No. The site is currently undeveloped. The neighboring residential communities and commercial developments are serviced by public water. Due to the age of the surrounding development (both commercial and residential) it is not anticipated that lead pipes were used during construction. Therefore, no potential for lead contamination is expected.

...Involve a facility or water supply that may contain radon in excess of the EPA action level.

No. According to EPA information, the proposed site is located within EPA Zone 2 (EDR, 2007). Of the sites within Albemarle County that were tested for radon, all of the sites recorded radon levels less than the EPA standard of 4 picocuries per liter (pCi/L) for first floors of buildings (EDR, 2007). Sixty-two percent of the sites recorded radon levels less than 4 pCi/L in basement areas (EDR, 2007).

**Checklist Question D:**

**Is the action likely to adversely affect a significant aspect of the natural environment?**

**Is the action likely to:**

...Affect an endangered or threatened species, or its critical habitat.

Unknown. According to the Virginia Department of Conservation Resources (DCR), no records indicate the presence of threatened or endangered species within the property boundary. However, DCR states that the Atlantic pigtoe (*Fusconaia masoni*, G2/S2/SOC/LT) is present downstream from the proposed site and is listed as threatened by the Virginia Department of Game and Inland Fisheries (VDGIF). In order to minimize impacts to the Atlantic pigtoe, the DCR suggests implementing and strictly adhering to “applicable state and local erosion and sediment control/storm water management laws and regulations” (Personal communication, Rene Hypes, June 20, 2007). If this site is chosen, GSA should coordinate their development efforts with the VDGIF and DCR to ensure compliance of applicable regulations.

The DCR, via a Memorandum of Agreement with the Virginia Department of Agriculture and Consumer Services (VDACS), states the proposed action “will not affect any documented state-listed plants or insects” (Personal communication, Rene Hypes, June 15, 2007).

A letter requesting information regarding threatened and/or endangered species was submitted to the FWS. The correspondence was submitted on May 17, 2007. The FWS has not yet replied.

...Affect a species under consideration for listing as endangered or threatened, or its critical habitat.

Unknown. According to the Virginia Department of Conservation Resources (DCR), no records indicate the presence of threatened or endangered species within the property boundary. However, DCR states that the Atlantic pigtoe (*Fusconaia masoni*, G2/S2/SOC/LT) is present downstream from the proposed site and is listed as threatened by the Virginia Department of Game and Inland Fisheries (VDGIF). In order to minimize

impacts to the Atlantic pigtoe, the DCR suggests implementing and strictly adhering to “applicable state and local erosion and sediment control/storm water management laws and regulations” (Personal communication, Rene Hypes, June 20, 2007). If this site is chosen, GSA should coordinate their development efforts with the VDGIF and DCR to ensure compliance of applicable regulations.

A letter requesting information regarding threatened and/or endangered species was submitted to the FWS. The correspondence was submitted on May 17, 2007. The FWS has not yet replied.

...Alter a natural ecosystem:

No. While the site is currently undeveloped, it is located in an already populated area. Development of the site will not have substantial impacts to natural ecosystems as there is a great deal of undeveloped land surrounding the site. Land immediately surrounding the proposed site is undeveloped; however, the existing NGIC facility is located southeast of the site. Within a 1-mile radius of the proposed site are commercial developments (to include the General Electric office complex and the University of Virginia Research office park) as well as at least one residential development built in the mid-1980's. According to Mr. Wood, west across Seminole Trail he is adding onto the existing 1980's residential development with single-family homes (Personal communication, Wendal Wood, May 16, 2007). Mr. Wood also plans to build a Wal-Mart, Kohl's and another shopping center in the vicinity of the proposed site (Personal communication, Wendal Wood, May 16, 2007). At least one store will be opened by March 2008 (Personal communication, Wendal Wood, May 16, 2007).

...Affect the water supplies of humans, animals, or plants:

No. There are no surface water bodies on the project site.

...Affect the water table:

No. The proposed project will be small in scale and will not significantly affect surface water recharge. In addition, wells would not be utilized for the site's potable water supply. The ACSA provides public water services to County residents. Water services are purchased by ACSA from the Rivanna Water and Sewer Authority, which operates the water and wastewater treatment plants, reservoirs, and transmissions that serve County customers.

...Involve construction or use of a facility on or near an active geological fault:

No. There is no active geological fault in the region.

...Result directly or indirectly in construction on slopes greater than 15%:

No. The proposed site is not located on a parcel that consists of slopes greater than 15%. It is not anticipated that the proposed lease/construction facility will create slopes greater than 15%.

...Result in construction on or near hydric soils, wetland vegetation, or other evidence of a wetland:

No. Fluvanna silt loam and Elioak loam are found within the property boundaries of the proposed NGIC facility. These soil series are not considered hydric soils in Virginia (USDA, 2007). Based on information provided by the NWI, there are no wetlands on the site.

...Result in construction on or near any other natural feature that could affect the safety of the public, or the environmental impacts of the action.

No. The project site is not located on or near any natural feature that could affect safety of the public.

**Checklist Question E:**

**Is the action likely to adversely affect a significant aspect of the sociocultural environment?**

**Is the action likely to:**

...Cause the displacement or relocation of businesses, residences, or farm operations:

No. The property is currently undeveloped and not being used for any purpose.

...Affect the economy of the community in ways that result in impacts to its character, or to the physical environment:

No. The existing NGIC office building is located less than 5,000 feet of the proposed site. Both the proposed and existing NGIC facilities are located in an area that has already undergone commercial development. Furthermore, no additional employees are being brought to this area for employment at the new facility. Existing employees at the currently overcrowded NGIC facility will be moved to the new building.

...Affect sensitive receptors of visual, auditory, traffic, or other impacts, such as schools, cultural institutions, churches, and residences:

No. The surrounding area is a mixture of office space/commercial structures with parking areas, residential communities, and vacant/undeveloped land scattered throughout. There are two schools within a 2-mile the vicinity of the site, but several residential communities separate the United Land Corp site from the schools. Entrance to the schools is gained from within the Forest Lakes/Hollymead communities off Seminole Trail and access would not be hindered as a result of this development action. There are no cultural institutions or churches located within the vicinity of the site.

...Affect any practice of religion (e.g., by impeding access to a place of worship):

No. Development of the site would not impede access to a place of worship. There are no cultural institutions or churches located in the immediate vicinity of the proposed site.

...Result in the storage or discharge of pollutants in the environment of such a group:

No. The proposed lease/construction site is currently undeveloped land.

...Have adverse economic impacts on such a group:

No. The surrounding areas have already been developed in a manner that is consistent with the nature of the proposed project.

...Alter the sociocultural character of such a group's community or neighborhood, or its religious practices:

## CATEX Checklist Supporting Information

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No. The surrounding areas have already been developed in a manner that is consistent with the nature of the proposed project.

...Alter such a group's use of land or other resources:

No. The surrounding areas have already been developed in a manner that is consistent with the nature of the proposed project. There are no cultural institutions, churches, or schools currently using the proposed site or adjacent properties that will be disrupted by development of the NGIC facility.

Is the action likely to have physical, visual, or other effects on:

...Districts, sites, buildings, structures and objects that are included in the National Register of Historic Places, or a State or local register of historic places:

No. Based on information obtained from the Albemarle County Historical Society, there are no National Register districts, sites, buildings, structures, or objects within the project area.

...A building or other structure that is over 45 years old:

No. There are no buildings or structures located within the vicinity of the site that are more than 45 years old.

...A neighborhood or commercial area that may be important in the history or culture of the community:

No. See responses above regarding the historic and cultural nature of the site and immediate vicinity.

...A neighborhood, commercial, industrial, or rural area that might be eligible for the National Register as a district:

No. There are no listed or eligible neighborhoods, commercial, industrial, or rural areas that might be eligible for the National Register as a district in the project area.

...A known or probable cemetery, through physical alteration or by altering its visual, social, or other characteristics:

No. A cemetery is located on an adjacent parcel to the proposed site. The family that owned the proposed site and surrounding lands approximately 100 years earlier (the Pritchett family) has members interred in this cemetery. The family cemetery is located in a heavily wooded area and will not be moved or affected in any way by the proposed action (Personal communication, Wendal Wood, May 16, 2007).



**Cemetery located on an adjacent parcel**

...A rural landscape that may have cultural or esthetic value:

No. This site is located in a developing area. There are no rural landscapes in the vicinity of the site.

...A well-established rural community, or rural land use:

No. The project site is located within a developed area and is not rural in nature.

...A place of traditional cultural value in the eyes of a Native American group or other community.

No. There are no areas identified as having high potential to contain Native American cultural items within the project area.

...A known archeological site, or land identified by archeologists consulted by GSA as having high potential to contain archeological resources:

Yes. No known archaeological resources are present within the United Land Corp site. However, according to the property owner, this property has not been surveyed for the presence of archaeological resources (Personal communication, Wendal Wood, May 21, 2007). A tract of land immediately adjacent to the United Land Corp site had been surveyed in 2006 (Brady et al. 2007). This survey identified the remains of an outbuilding associated with the Michie Farm (002-1440) in an area that appears to be immediately adjacent to the northwestern boundary of the United Land Corp site. Given the proximity of these remains to the United Land Corp site, additional remains could be present in the immediate vicinity.

As well, as of May 2006, there have been 11 archaeological sites identified within approximately one mile of the United Land Corp site. These sites are situated in upland settings and a number are located above drainages. The United Land Corp site appears to be located within a similar physiographic setting. A visual inspection of the proposed site appears to indicate that subsurface impacts to the parcel have been minor. Therefore, the United Land Corp parcel can be characterized as having a moderate to high potential for the presence of archaeological sites, including remains associated with the adjacent Michie Farm. An archeological survey would need to be conducted to provide a determination regarding the presence of archeological sites.

...An area identified by archeologists or a Native American group consulted by GSA as having high potential to contain Native American cultural items.

Yes. No known Native American archaeological resources are present within the United Land Corp site. However, according to the property owner, this property has not been surveyed for the presence of archaeological resources (Personal communication, Wendal Wood, May 21, 2007). Six of the 11 archaeological sites that have been located within one mile of the United Land Corp parcel are prehistoric Native American sites. These sites are situated in upland settings and a number are located above drainages. The United Land Corp site appears to be located within a similar physiographic setting. A visual inspection of the proposed site appears to indicate that subsurface impacts to the parcel have been minor. Therefore, the proposed NGIC parcel can be characterized as potentially having an impact on as yet unidentified prehistoric Native American cultural items. An archeological survey would need to be conducted to provide a determination regarding the presence of archeological sites.

**Checklist Question F:**

**Is this action likely to generate controversy on environmental grounds?**

Is this action likely to be environmentally controversial in any way?

No. This action is not likely to be environmentally controversial in any way.

**Checklist Question G:**

**Is there a high level of uncertainty about your action's environmental effects?**

No. The proposed action is of a demonstrated and routine construction and operation nature with minimal environmental consequences.

**Checklist Question H:**

**Is the action likely to do something especially risky to the human environment?**

No. The proposed action is of a demonstrated and routine construction and operation nature with no unknown or unacceptable risks.

**Checklist Question I:**

**Is the action part of an ongoing pattern of actions (whether under the control of GSA or others) that are cumulatively likely to have adverse effects on human environment?**

Is the action likely to be:

...Part of an ongoing pattern of development that could collectively change the quality of the human environment, such as suburbanization, "gentrification," or urban renewal?

No. The immediate vicinity and great area surrounding the site have already been developed commercially and residentially. The proposed action would contribute to the change; however, this development would not collectively change the quality of the human environment.

**Checklist Question J:**

**Is the action likely to set a precedent for, or represent a decision in principle about, future GSA actions that could have significant effects on the human environment?**

No. The proposed action is of a demonstrated and routine construction and operation nature with no unknown or unacceptable risks.

**Checklist Question K:**

**Is the action likely to have some other adverse effect on public health and safety or on any other environmental media or resources that are not specifically identified above?**

No. No effect not previously identified in this document is anticipated.

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# **Appendix F**

## **COMMENT LETTERS**

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January 22, 2008

Colonel Brian W. Lauritzen, Commander  
U.S. Army Garrison Fort Belvoir  
9430 Jackson Loop, Suite 100  
ATTN: IMNE-BEL-PW  
Fort Belvoir, Virginia 22060-5116

RE: Draft Environmental Assessment for the Expansion of Rivanna Station,  
Albemarle County, Virginia, (DEQ 07-229F).

Dear Colonel Lauritzen:

The Commonwealth of Virginia has completed its review of the above-referenced Draft Environmental Assessment (EA). The Department of Environmental Quality (DEQ) is responsible for coordinating Virginia's review of federal environmental documents prepared pursuant to the National Environmental Policy Act and responding to appropriate federal officials on behalf of the Commonwealth. The following agencies, Planning District Commission and locality joined in this review:

- Department of Environmental Quality
- Department of Conservation and Recreation
- Department of Game and Inland Fisheries
- Department of Agriculture and Consumer Services
- Department of Transportation
- Department of Health
- Department of Forestry
- Department of Mines, Mineral and Energy
- Department of Historic Resources
- Thomas Jefferson Planning District Commission
- Albemarle County

## PROJECT DESCRIPTION

The U.S. Army Garrison, Fort Belvoir, proposes to construct additional facilities at the National Ground Intelligence Command (NGIC) at Rivanna Station. Rivanna Station is located on 76 acres east of U.S. Route 29 and north of the City of Charlottesville in Albemarle County, Virginia. The facility is a subordinate post of Fort Belvoir. Construction activities include the following:

- A 170,502 square foot, four-story Joint Intelligence Analysis Facility;
- 1,000 linear feet, two-lane extension of Boulders Road;
- A 20,000 square foot remote delivery facility/warehouse for mail and other deliveries;
- A +/- 73,000 square foot addition to the existing National Ground Intelligence Center;
- 230,000 square feet of surface parking;
- A three story, 260-space multi-storied parking garage; and
- Access control point with associated visitor control center with a 40,000 square foot parking lot.

Associated projects include the reconfiguration of existing landscaping, walkways and roadways and the installation of new utilities. In addition, the Army will purchase 50 acres of land north and southeast of Boulders Road to prevent future encroachment by private development around the facility. The land to be purchased is vacant except for a gravel parking area.

These activities are part of the Base Realignment and Closure Commission 2005, Recommendation 167.

## ENVIRONMENTAL IMPACTS AND MITIGATION

**1. Water Quality & Wetlands.** The Draft EA states (page 4-18) that the proposed construction would impact approximately 0.07 acre of wetlands. Permits for wetland impacts will be obtained prior to the start of construction.

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

projects, the seven DEQ regional offices perform permit application reviews and issue permits for the covered activities.

**1(b) Comments.** The DEQ-Valley Regional Office states that the Draft EA addresses anticipated impacts and regulatory requirements associated with stream and wetland impacts.

**1(c) Recommendations.** Since wetlands are to be impacted, a Virginia Water Protection (VWP) permit must be obtained from DEQ prior to construction. A Joint Permit Application (JPA) for a VWP permit must be submitted to DEQ for approval in accordance with 9 VAC 25-210-50. A VWP permit must be approved prior to commencement of any land-disturbing activity on the site.

In general, DEQ recommends that stream and wetland impacts be avoided to the maximum extent practicable. For unavoidable impacts, DEQ encourages the following practices to minimize the impacts to wetlands and waterways:

- operation of machinery and construction vehicles outside of stream-beds and wetlands;
- use of synthetic mats when in-stream work is unavoidable;
- stockpiling of material excavated from the trench for replacement if directional drilling is not feasible; and
- preservation of the top 12 inches of trench material removed from wetlands for use as wetland seed and root stock in the excavated area.

**2. Subaqueous Lands Impacts.** The Draft EA gives no indication that impacts to stream channels would occur as part of the proposed project.

**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.

The Virginia Marine Resources Commission (VMRC) serves as the clearinghouse for the JPA used by the:

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

VMRC will distribute the completed JPA to the appropriate agencies. Each agency will conduct its review and respond.

**3. Erosion and Sediment Control and Stormwater Management.** According to the Draft EA (page 4-27), construction will cause short-term, minor erosion of sediments during grading. However, strict adherence to state and local erosion and sediment control laws and regulations should help to protect natural resources near the project site (Draft EA, page 4-24).

**3(a) Erosion & Sediment Control (ESC) and Stormwater Management Project-Specific Plans.** According to the Department of Conservation and Recreation's (DCR's), Division of Soil and Water Conservation, federal agencies and their authorized agents conducting regulated land-disturbing activities on private and public lands in the state must comply with the Virginia Erosion and Sediment Control Law and Regulations (VESCL&R), Virginia Stormwater Management Law and Regulations (VSWML&R), and other applicable federal nonpoint source pollution mandates (e.g. Clean Water Act Section 313, Federal Consistency under the Coastal Zone Management Act). Clearing and grading activities, installation of staging areas, parking lots, roads, buildings, utilities, or other structures, soil/dredge spoil areas, or related land conversion activities that disturb 10,000 square feet or more would be regulated by VESCL&R and those that disturb one acre or greater would be covered by VSWML&R. Accordingly, the Army should prepare and implement erosion and sediment control (ESC) and stormwater management (SWM) plans to ensure compliance with state law. The federal agency is ultimately responsible for achieving project compliance through oversight of on-site contractors, regular field inspection, prompt action against non-compliant sites, and/or other mechanisms, consistent with agency policy. The Army is highly encouraged to contact DCR's James Watershed Office (telephone, (804) 225-4468) and/or the local ESC and SWM authorities to obtain plan development, implementation assistance and to ensure project conformance during and after active construction.

**3(b) VSMP General Permit for Construction Activities.** DCR is responsible for the issuance, denial, revocation, termination and enforcement of the Virginia Stormwater Management Program (VSMP) General Permit for Stormwater Discharges from Construction Activities (previously known as Virginia Pollutant Discharge Elimination System (VPDES) General Permit for Stormwater Discharges from Construction Activities) related to municipal separate storm sewer systems (MS4s) and construction activities for the control of stormwater discharges from MS4s and land disturbing activities under the Virginia Stormwater Management Program. Therefore, for projects involving land-disturbing activities of 1 acre or more, the applicant or its authorized agent is required to apply for registration coverage under the General Permit for Discharges of Stormwater from Construction Activities. General information and registration forms for the General Permit are available on DCR's website at <http://www.dcr.virginia.gov/sw/vsmp.htm#geninfo>.

**4. Air Pollution Control.** The Draft EA states (page 4-6) that facility construction will cause minor increases in short- and long-term emissions. However, the increases would not be regionally significant and would not contribute to violations of air regulations. The Army is aware that any new sources of emissions may be subject to

both federal and state permitting requirements (Draft EA, page 4-8). The Army will minimize fugitive particle emissions during construction (Draft EA, page 4-28).

**4(a) Agency Jurisdiction.** DEQ's Air Quality Division, on behalf of the State Air Pollution Control Board, is responsible for developing regulations that become Virginia's Air Pollution Control Law. The 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 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. As a part of this mandate, Environmental Impact Reports of projects to be undertaken in the State are also reviewed. In the case of certain projects, additional evaluation and demonstration must be made under the general conformity provisions of state and federal law.

**4(b) Agency Comments.** The DEQ-Valley Regional Office states that the Draft EA addresses anticipated impacts and regulatory requirements associated with air permitting.

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

**4(d) Fugitive Dust.** During debris removal and 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.

**4(e) Fuel Burning Equipment.** An air permit may be required for any new boilers, fuel-burning equipment or emergency generators. For more information, contact Sharon Foley at DEQ's Valley Regional Office (telephone, (540) 574-7821).

**5. Solid and Hazardous Wastes and Hazardous Materials.** The Draft EA states (page 3-12) that the facility participates in a Qualified Recycling Program for recyclables other than paper. Solid waste is disposed of at an approved landfill. Also, the proposed project sites do not appear to have been subject to the disposal of any hazardous waste and there are no known hazardous waste contaminated sites in close proximity to the proposed site (Draft EA, page 3-40).

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

**5(b) Comments.** The Draft EA addresses both solid and hazardous waste issues and included a search of waste-related databases. A GIS database search did not reveal any waste sites within a half mile radius that would impact or be impacted by the project site.

**5(c) Findings.** The Waste Division staff reviewed its data files and determined that there is a hazardous waste facility, two solid waste sites and a Voluntary Remediation Program (VRP) site within the same zip code as the proposed project site, although the proximity of these sites to the subject site is unknown. The sites are as follows:

Hazardous waste:

- University of Virginia, (VAD000820712 LQG (active) & TSD (active)

Solid Waste:

- University of Virginia, PBR 226, RMW Storage Facility
- Virginia Ambulatory Surgery Center, PBR 138, RMW Storage Facility

VRP:

- VRP00381, 904 Grove Street, Certificate Issued.

**5(c) Recommendations.** DEQ encourages all construction projects and facilities to implement pollution prevention principles, including:

- the reduction, reuse, and recycling of all solid wastes generated; and
- the minimization and proper handling of generated hazardous wastes.

For further information, contact Paul Kohler, DEQ-Waste Division, at (804) 698-4208.

**6. Natural Heritage Resources.** The Draft EA states (page 4-24) that strict adherence to state and local erosion and sediment control and stormwater management laws and regulations should protect the habitat of the James spineymussel and the Atlantic pigtoe. The project will not affect any documented state-listed plant or insects.

**6(a) Agency Jurisdiction.** The mission of the Virginia Department of Conservation and Recreation (DCR) is to conserve Virginia's natural and recreational resources. DCR supports a variety of environmental programs organized within seven divisions including the Division of Natural Heritage (DNH). The Natural Heritage Program's (DCR-DNH) mission is conserving Virginia's biodiversity through inventory, protection, and stewardship. The Virginia Natural Area Preserves Act, 10.1-209 through 217 of the Code of Virginia, was passed in 1989 and codified DCR's powers and duties related to statewide biological inventory: maintaining a statewide database for conservation planning and project review, land protection for the conservation of biodiversity, and the protection and ecological management of natural heritage resources.

**6(b) Agency Comments.** DCR-DNH 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.

**6(c) Findings.** According to the information currently in DCR's files, the Atlantic pigtoe (*Fusconaia masoni*, G2/S2/SOC/LT) has been documented adjacent to the project site. Atlantic pigtoe is a medium-sized freshwater mussel reaching a length of 60 mm. In Virginia, this species is known from the James, Chowan and Roanoke River basins (TNC, 1996). The Atlantic pigtoe prefers clear, swift waters with gravel or sand and gravel substrates. Many populations from the main stem of larger rivers have disappeared. The species is limited to the headwater areas of drainages in which it occurs. Threats to this rare mussel species include pollution, impoundments, clearcutting and dredging (Gerberich, 1991). This species is currently listed as threatened by the Virginia Department of Game and Inland Fisheries (DGIF) and is also tracked as a species of concern by the United States Fish and Wildlife Service (USFWS). This designation has no official legal status.

**6(d) Threatened and Endangered Plant and Insect Species.** Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and DCR, DCR has the authority to report for VDACS on state-listed plant and insect species. VDACS has regulatory authority to conserve rare and endangered plant and insect species through the Virginia Endangered Plant and Insect Species Act. DCR found that the current activity will not affect any documented state-listed plant and insect species. VDACS reviewed the document and stated that they concur with the findings in the Draft EA.

**6(e) Natural Area Preserves.** DCR found that there are no State Natural Area Preserves under its jurisdiction in the project vicinity.

**6(f) Recommendations.** Due to the legal status of the Atlantic pigtoe, DCR recommends coordination with DGIF to ensure compliance with protected species legislation. To minimize adverse impacts to the aquatic ecosystem as a result of the proposed activities, DCR also recommends the implementation of and strict adherence to applicable state and local erosion and sediment control/storm water management laws and regulations.

Also, since new and updated information is continually added to Biotics, please contact DCR's Division of Natural Heritage at (804) 786-7951 if a significant amount of time passes before the project is implemented.

**7. Wildlife and Fisheries Resources** The Draft EA states (page 4-24) that surveys for the James spiny mussel, Atlantic pigtoe and the Indiana bat would be completed prior to the start of construction. In addition, the Army has completed a suitable habitat survey for the Appalachian grizzled skipper and determined that the required shale barrens needed for its habitat are not likely present.

**7(a) Agency Jurisdiction.** DGIF, as the Commonwealth's wildlife and freshwater fish management agency, exercises enforcement and regulatory jurisdiction over wildlife and freshwater fish, including state or federally listed endangered or threatened species, but excluding listed insects (*Virginia Code* Title 29.1). DGIF is a consulting agency under the U.S. Fish and Wildlife Coordination Act (16 U.S.C. sections 661 *et seq.*) and provides environmental analysis of projects or permit applications coordinated through DEQ and several other state and federal agencies. DGIF determines likely impacts upon fish and wildlife resources and habitat, and recommends appropriate measures to avoid, reduce, or compensate for those impacts. For more information, see the DGIF website at [www.dgif.state.va.us](http://www.dgif.state.va.us).

**7(b) Agency Comments.** DGIF supports the recommendation that mussel surveys be performed at the project site prior to construction. DGIF does not support proposals to mitigate wetland impacts through the construction of stormwater management ponds, nor does it support the creation of in-stream stormwater management ponds. DGIF is willing to assist the applicant in developing a plan that includes open-space, wildlife habitat, and natural stream channels which retain their wooded buffers.

**7(c) Findings.** According to DGIF's records, the federal endangered James spiny mussel and state threatened Atlantic pigtoe have been documented in the project area. The North Fork Rivanna River has been designated a Threatened and Endangered Species Water due to the presence of these species. It has also been designated a Potential Anadromous Fish Use Area.

DGIF does not document the federal endangered Indiana bat in the immediate project area; however, it appears that habitat for this species will be adversely impacted by the development of this site. Therefore, DGIF supports comments provided by the U.S. FWS and DCR regarding the Indiana bat.

**7(d) Recommendations.** DGIF has the following recommendations:

- Coordinate the mussel survey protocol, location, length and timing with Brian Watson, DGIF -Region II Wildlife Diversity Biologist (telephone, (434) 525-7522). The survey should be performed in the segment of the river that is immediately adjacent to the project and downstream of the proposed stormwater discharge. DGIF will make final comments about the protection of listed mussel species once it reviews the survey results.
- Complete survey work on the Indiana bat prior to construction activities. If impacts to the bat are likely, then mitigatory measures to reduce or compensate those impacts may be required.
- Observe the time-of-year restriction on all instream work in the North Fork Rivanna River and/or its tributaries from May 15 through July 31 for the protection of listed mussels species.
- Follow a time-of-year restriction from February 15 through June 30 for instream work on the North Fork Rivanna River.
- Maintain a 200-foot naturally vegetated riparian buffer on the North Fork Rivanna River and its tributaries.

In addition, to protect listed mussel species, DGIF recommends the following:

- Limit the amount of impermeable surfaces to the greatest extent possible
- Implement LID techniques such as utilizing bioretention areas and grassed swales.
- Use permeable surfaces for all parking lots.
- Avoid and minimize impacts to undisturbed forest, wetlands, and streams to the fullest extent practicable.
- Maintain undisturbed wooded buffers of at least 100 feet in width around all on-site wetlands

For in-stream work or crossings, DGIF recommends:

- conducting any in-stream activities during low or no-flow conditions;
- using non-erodible cofferdams to isolate the construction area;
- blocking no more than 50% of the streamflow at any given time;
- stockpiling excavated material in a manner that prevents reentry into the stream; restoring original streambed and streambank contours;
- re-vegetating barren areas with native vegetation;
- implementing strict erosion and sediment control measures;
- constructing all equipment crossings using clear span structures, to the extent feasible;
- using wire-enforced sediment fencing;
- using straw bales along streams;
- pumping any water that collects within a cofferdam or work trench into a frac tank, sediment basin, or sediment bag to allow the sediment to settle out. When the water is discharged, it should be through a well stabilized vegetated area prior to re-entering the stream.

**7(e) Additional Information.** DGIF maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters that may contain additional information. DGIF's database may be accessed from [www.dgif.virginia.gov/wildlifeinfo\\_map/index.html](http://www.dgif.virginia.gov/wildlifeinfo_map/index.html), or contact Shirl Dressler (telephone, (804) 367-6913).

**8. Geologic Resources, Mineral Resources.** The Draft EA does not address geologic resources of the area.

**8(a) Agency Jurisdiction.** The mission of the Department of Mines, Minerals and Energy (DMME), Division of Mineral Resources (DMR) is to enhance the development and conservation of energy and mineral resources in a safe and environmentally sound manner to support a more productive economy in Virginia. Serving as Virginia's geological survey, DMME-DMR generates, collects, compiles, and evaluates geologic data, creates and publishes geologic maps and reports, works cooperatively with other state and federal agencies, and is the primary source of information on geology, mineral and energy resources, and geologic hazards for both the mineral and energy industries and the general public. DMME-DMR also provides the necessary geologic support for those divisions of DMME that regulate the permitting of new mineral and fuel extraction sites, miner safety, and land reclamation.

**8(b) Agency Comments.** The DMME states that the project does not pose an impact to mineral resources of the Commonwealth.

**9. Forestry Resources.** The Draft EA states (page 4-23) that the proposed project will remove 7.5 acres of forested land.

**9(a) Agency Comments.** The Department of Forestry (DOF) states that the project will have limited impact to the overall forest resources of the Commonwealth.

**9(b) Recommendations.** DOF recommends that wherever feasible, the Army should leave trees in groupings or clusters to provide esthetic and environmental benefits, as well as reducing costs associated with maintaining open space. In addition, mitigation for the clearing of forest resources can be accomplished by replanting pine and/or hardwood seedlings in areas of at least one-half acre in size. DOF's area forester can assist the Army in their reforestation efforts. For additional information on reforestation efforts, contact DOF's Charlottesville Regional Office (telephone, (434) 977-5193).

Also, to the extent practicable, DOF recommends that the Army implement the following measures during construction to protect trees not slated for removal:

- mark and fence trees at least to the dripline or the end of the root system, whichever extends farther from the tree stem;
- mark trees with highly visible ribbon so that equipment operators can see the protected areas easily;
- do not park heavy equipment, move or stack construction materials near trees which can damage root systems by compacting the soil;

- use temporary crossing bridges or mats to minimize soil compaction and mechanical injury to plants; and
- stockpile soil away from trees to avoid killing the root systems.

Questions on tree protection may be directed to Todd Groh of the Department of Forestry (telephone, (434) 997-6555, ext. 3344).

**10. Transportation Impacts.** The Draft EA states (page 4-3) that minor short- and long-term impacts on traffic are expected due to the proposed project. Construction traffic will temporarily increase traffic congestion in the area, but long-term traffic increases will occur due to an increase in employment of approximately 1,050 people at Rivanna Station. The EA suggests that the increase in traffic in the area is due in part to the expansion of Rivanna Station, but also due to natural traffic growth in the area. In addition, the Draft EA states (page 4-5) that the widening of Route 29 will bring relief to the traffic congestion. The widening of Route 29 is a planned project under the Virginia Department of Transportation's (VDOT) Long Range Plan.

**10(a) Agency Comments.** After review of the Draft EA, VDOT has the following comments:

- The traffic study uses a 3% growth rate for determining the background traffic on Route 29. Based on VDOT historical data, the growth trend for this portion of Route 29 is 0.80 %. This will reduce the projected demand on the intersection of Route 29 and Boulders Road.
- The study does not include the approved residential development planned for the west side of Route 29. The development will construct the western leg to the intersection of Route 29 and Boulders Road and provide improvements to the intersection. The construction will change the intersection configuration, traffic patterns and signal timing.
- The Draft EA (page 4-5) and traffic study states that VDOT's Long Range Plan is to widen Route 29 North to the Greene County Line. The widening of Route 29 north of Airport Road (Route 649) is not currently in any plan or forecast model and should not be considered as a solution for traffic congestion at this intersection. Route 29 from Route 643 (Polo Grounds Road) to Route 649 (Airport Road) will be widened, but this section of Route 29 is south of Rivanna Station. In addition the North Point Development in conjunction with the North Fork Research Park have proffered to widen Route 29 from Route 649 (Airport Road) to Route 1571 (Lewis and Clark Drive), but this is also south of Rivanna Station.
- Based on the US 29 North Corridor Transportation Study, the Route 29 corridor through this area was reviewed and the Boulders Road/Route 29 intersection was analyzed. The review included the expansion proposed for the NGIC site and the approved development west of Route 29, with growth projected through

2025. The analysis showed Levels of Service (LOS) C for the overall intersection in the future and did not recommend widening Route 29 through this area. However the side street approaches to the intersection will experience a LOS E in the PM peak hour and a LOS D on the northbound approach to Route 29.

The LOS for the Boulders Road/Route 29 intersection is of concern to VDOT. The Draft EA identifies the widening of Route 29 as the solution, but it does not address or provide assistance for that goal.

**10(b) Recommendations.** An aggressive Ride Share, Transit and Travel Demand Management Program could reduce to a nominal amount the vehicle trips to and from the site. However, in the future (2025 and beyond), other solutions must be identified and implemented in order to maintain an acceptable Level of Service at this intersection.

VDOT recommends that any land use requirements, lane closures, traffic control, or work zone safety issues should be closely coordinated with VDOT's Culpeper Residency Office.

**11. Historic Structures and Archaeological Resources.** According to the Draft EA (page 4-25), there are no National Register-listed or -eligible architectural resources within Rivanna Station. Two archaeological sites are known to exist at the facility. Both sites are not eligible for listing in the National Register of Historic Places (NRHP) and it is not likely that the construction would disturb these resources. However, one of the sites is a cemetery and if the cemetery is disturbed, Fort Belvoir will conduct a formal boundary determination and comply with all relevant Federal, State and local statutes regarding the protection and relocation of cemeteries. In addition, the Army will maintain a minimum 50-foot buffer around the cemetery, in accordance with the State Historic Preservation Office.

**11(a) Agency Jurisdiction.** The Department of Historic Resources (DHR) conducts reviews of projects to determine their effect on historic structures or cultural resources under its jurisdiction. DHR, as the designated State's Historic Preservation Office, ensures that federal actions comply with *Section 106 of the National Historic Preservation Act of 1966 (NHPA)*, as amended, and its implementing regulation at 36 CFR Part 800. The NHPA requires federal agencies to consider the effects of federal projects on properties that are listed or eligible for listing on the National Register of Historic Places. Section 106 also applies if there are any federal involvements, such as licenses, permits, approvals or funding. DHR also provides comments to DEQ through the state EIR review process.

**11(b) Agency Comments.** DHR states that it previously commented directly to the Army. DHR determined that the proposed project will not affect historic properties provided that the cemetery is avoided. DHR has no further comment at this time.

**12. Storage Tanks.** The Draft EA states (page 3-39) that Rivanna Station has one 10,000-gallon diesel underground storage tank that was installed in 2001. The proposed use of emergency generators will require the installation of underground storage tanks to fuel the generators (Draft EA, pages 4-24 and 4-25). The Army is aware of the requirement to apply for permits from DEQ to install, repair, upgrade and close any storage tanks located at the facility.

**12(a) Recommendations.** Any questions concerning registration for storage tanks should be directed to DEQ's Valley Regional Office. Also, if evidence of a petroleum release is discovered during construction of this project, it must be reported to DEQ's Valley Regional Office. Petroleum contaminated soils and ground water generated during construction of this project must be properly characterized and disposed of properly.

**13. Public Water Supply.** The Draft EA does not address public water supply issues.

**13(a) Findings.** The Virginia Department of Health finds that the project should have no adverse impact to public water supplies.

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

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

**15(a) Recommendations.** We have several pollution prevention recommendations that may be helpful in constructing or operating this project:

- 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.
- Consider environmental attributes when purchasing materials. For example, the extent of recycled material content, toxicity level, and amount of packaging should be considered and can be specified in purchasing contracts.

- Consider contractors' commitment to the environment (such as an EMS) when choosing contractors. Specifications regarding raw materials and construction practices can be included in contract documents and requests for proposals.
- Choose sustainable materials and practices for infrastructure construction and design. These could include asphalt and concrete containing recycled materials, and integrated pest management in landscaping, among other things.
- Integrate pollution prevention techniques into the facility maintenance and operation, to include the following: inventory control (record-keeping and centralized storage for hazardous materials), product substitution (use of non-toxic cleaners), and source reduction (fixing leaks, energy-efficient HVAC and equipment). Maintenance facilities should be designed with sufficient and suitable space to allow for effective inventory control and preventative maintenance.

DEQ's Office of Pollution Prevention provides information and technical assistance relating to pollution prevention techniques. For more information, contact DEQ's Office of Pollution Prevention, Mr. Tom Griffin at (804) 698-4545.

**16. Energy Conservation.** The proposal should be planned and designed to comply with state and federal guidelines and industry standards for energy conservation and efficiency. Agencies of the Commonwealth should review Executive Order 48 on energy efficiency in State government operations and take any appropriate actions that will assist in compliance. For example, the energy efficiency of the facilities can be enhanced by maximizing the use of the following:

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

Please contact Matt Heller, DMME (telephone, (434) 951-6351) for additional information.

## **17. Regional and Local Comments.**

**17(a) Regional Comments and Clarifications.** The Thomas Jefferson Planning District Commission (PDC) has the following comments. In addition, the PDC indicates that the Draft EA is unclear on several points and that clarification should be provided. The comments and points of clarification requested are summarized below.

- The Commission supports the request of Albemarle County staff for an extension of the comment period to allow adequate review time, because copies of the Draft EA were not available locally until January 2.
- The Draft EA refers to the purchase of three parcels totaling 50 acres, but the Finding of No Significant Impact letter mentions a “proposed purchase of approximately 100 acres.” In addition, Albemarle County staff has indicated that they cannot determine which parcels correspond to the proposed purchase. The final document should provide clarification regarding the amount of additional land to be purchased.
- Details are needed regarding what the type of Community Support Facility that may be developed on the additional land to be purchased.
- The PDC expressed concern about whether the expansion of the facility could really be considered a minor factor in the degradation of the intersection.
- The VDOT Long-Range Plan does not actually include widening Route 29 as far north as Rivanna Station as stated in the Draft EA. The Commissioners strongly encourage planning to minimize automobile trips to the expanded facility to the greatest extent possible.

See the attached comments for more details, including the excerpt from the Thomas Jefferson PDC Intersections study.

**17(b) Local Clarifications and Comments.** Albemarle County has the following comments. In addition, the County indicates that the Draft EA is unclear on several points and requests that clarification be provided. The comments and points of clarification requested are summarized below:

- There is mention of acquiring parcels north of Boulders Road at some time in the future, but the document does not indicate if the project area represents the proposed acquisition. The final document should clarify the boundaries of the proposed project area (See Fig 1-2, pg 1-9). Also, the Final EA should clarify what activities or uses are proposed for this area.
- PDC staff noted that the project area appears to extend much further than necessary to address the security issues raised in this report. Additionally, other facilities beyond what is considered in the Draft EA could alter the findings of this report with respect to community services and transportation impacts, among other issues. The final document should clarify how the proposed property acquisition is necessary to address security issues and indicate what additional facilities are envisioned for the project area
- The Draft EA notes a proposed development on page 3-2 (parts of Tax Map 33, Parcels 1D and 1F, Albemarle County Site Development Plan 2007-078), but

does not address the overlap between the development and the project area. The final document should address how the privately owned proposed development currently under review by Albemarle County will influence or be influenced by this project.

- The Draft EA does not identify specific improvements proposed by Fort Belvoir that would offset the transportation impacts from the proposed project. The project accelerates the need for offsite road improvements and contributes to the need for those improvements. Since VDOT has not allocated construction funds for the widening of Route 29 in Albemarle County, there could be significant delays on Route 29 in the vicinity of the site if these improvements are not in place when the improvements at NGIC are completed. Other projects in this area have committed to create a six lane road for 1,000' at each side of their entrances on Route 29. Recognition that similar improvements are warranted in this situation seems appropriate.
- Albemarle County fully anticipates transit service to be provided along the Route 29 corridor in the future. There are currently no regular transit routes that run north on Route 29 to the NGIC site.
- The proposed project is compatible with surrounding land uses and the County's current and future land use plans for the area. Please note that the County is currently undertaking a Development Area master planning process that includes the project area - *Places29*.
- During the development of this site, Fort Belvoir made a strong commitment to protecting water resources by having Albemarle County approve both an Erosion and Sediment Control Plan and Stormwater Management Plan for that facility and then working with county staff to implement the approved plan. A similar level of commitment would be supported by Albemarle County.
- The community has an interest in protecting dark skies from excessive lighting, due to the proximity of the surrounding area to two local observatories. The University of Virginia's Astronomy Department is one of the largest astronomy departments in the Southeast and is a world leader in innovation and cutting edge science.

Albemarle County's Comprehensive Plan directly addresses the issue (see "The Dark Sky":

[http://www.albemarle.org/upload/images/forms\\_center/departments/community\\_development/forms/Comprehensive\\_Plan/NATURAL\\_RESOURCES\\_&\\_CULRURAL\\_ASSETS\\_10\\_The\\_Dark\\_Sky.pdf](http://www.albemarle.org/upload/images/forms_center/departments/community_development/forms/Comprehensive_Plan/NATURAL_RESOURCES_&_CULRURAL_ASSETS_10_The_Dark_Sky.pdf)) and Albemarle County's Zoning Ordinance has requirements for minimizing light spillover (18-4.17:

[http://www.albemarle.org/upload/images/forms\\_center/departments/county\\_attorney/forms/Albemarle\\_County\\_Code\\_Ch18\\_Zoning04\\_General\\_Regulations.pdf](http://www.albemarle.org/upload/images/forms_center/departments/county_attorney/forms/Albemarle_County_Code_Ch18_Zoning04_General_Regulations.pdf)).

- The final document should address how the 1000+ new workers and their families might impact area schools.
- The final document should indicate how the facility design is being coordinated with the Albemarle County Police and Fire/Rescue.
- Albemarle County states that they support Fort Belvoir for committing to achieve Leadership in Energy and Environmental Design (LEED) at the Silver level. Given that both Albemarle County and the City of Charlottesville have made a similar commitment with their facilities, this level of environmental leadership is appreciated.
- The Draft EA incorrectly associates UVA's Research Park and the Northside Industrial Park with the Community of Piney Mountain. These industrial areas are in the adjacent Hollymead Community. The GE-Fanuc facility is within Piney Mountain, but not identified in the study.

**17(c) Recommendations.** The Thomas Jefferson PDC has the following recommendations:

- Obtaining LEED certification is strongly encouraged. Commissioners requested special attention to stormwater runoff; as stated in the LEED Specifications for New Construction (U.S. Green Building Council, October 2005).
- The PDC recommends planning to facilitate the use of travel demand management and transit and Rideshare programs to minimize automobile traffic. This includes the planning for transit access and a waiting area.
- For development of interior roads and parking lots, the Commission recommends using "green street" design as shown in the attached excerpt from the Thomas Jefferson PDC's US-29-Hydraulic-250 Bypass Intersections Study (29H250), to minimize stormwater runoff and heat island effects.

Albemarle County has the following recommendations.

- The new NGIC site should be transit-ready and the facility should provide financial assistance to the County for transit service to the site.
- Consideration should be given to providing vanpool/carpool services, supporting local Park-and-Ride and Ride-Share programs to serve employees commuting to and from work, and providing shuttle services during the day which connect to area service/employment centers to meet employee and nearby contractor work-day trip demands. In addition, other traffic management strategies should be implemented, such as staggering shift hours.

- The project should be considered in the context of the Development Area master plan.
- Rainwater harvesting should be included as a design component of the facility as a method of low-impact development and as part of the Fort Belvoir's commitment to LEED design.
- The design of this project should meet local requirements for erosion and sediment control, stormwater management, and stream buffer protection.
- The project design should meet local lighting requirements to the greatest extent feasible and that the Draft EA demonstrate a commitment to honor the County's interest in protecting dark skies.
- Fort Belvoir should coordinate with the Albemarle County Service Authority on sewer capacity available for this property. Section 3.4.2 – Sanitary Sewer does not consider available capacity for future connections. There are known issues with sewer capacity in this area.
- Fort Belvoir should consider providing appropriate habitat for indigenous species (e.g. Indiana bat) when planning replacement vegetation and other mitigation measures. This action would be in support of the County's interest in maintaining biodiversity of natural resources.

For additional information on the County's comments, please see the attached letter or contact Tamara Ambler (telephone, (434) 296-5832 ext. 3264 or email, [tambler@albemarle.org](mailto:tambler@albemarle.org)).

## REGULATORY AND COORDINATION NEEDS

**1. Water Quality and Wetlands.** Impacts to wetlands associated with the proposed improvements may require authorization under a Virginia Water Protection (VWP) permit (9 VAC 25-210-50). A completed Joint Permit Application (JPA) should be submitted and a VWP permit acquired prior to commencement of any land-disturbing activity in wetlands or waters of the U.S. Contact VMRC at (757) 247-2200 for a JPA. The VMRC will distribute the application to the appropriate agencies. Each agency will conduct its review and respond. For additional information on the VWP permit program, contact Keith Fowler of the DEQ-Valley Regional Office (telephone, (540) 574-7812).

**2. Subaqueous Lands Impacts.** Project impacts to subaqueous lands would require a permit from VMRC, pursuant to Section 28.2-1204 of the Code of Virginia. Encroachments channelward of ordinary high water along creeks and streams may require permitting. As with water and wetland permitting, subaqueous lands permitting may be accomplished with the submission of a JPA to the VMRC. For additional information, contact Ben McGinnis of the VMRC at (757) 247-8028.

**3. Erosion and Sediment Control and Stormwater Management.** Since this project will disturb 10,000 square feet or more, an erosion and sediment control (ESC) plan should be submitted for approval to the Department of Conservation and Recreation, Division of Soil and Water Conservation, James Regional Office (VESCL §10.1-560, §10.1-564; VESCR §4VAC50-30-30, §4VAC50-30-100).

As with the ESC Plan, the Army is required to prepare a project-specific Stormwater Management Plan for all projects involving a regulated activity. All specifications and plans must be prepared in accordance with the current versions of the Virginia Stormwater Management Law and the *Virginia Stormwater Management Regulations* (4 VAC 3-20-210 through 3-20-245). The Army must continue to work with DCR's James Regional Office (telephone, (804) 225-4468) for approval of its ESC and SWM Plans.

**3(a) VSMP General Permit.** For projects involving land-disturbing activities impacting 1 acre or more, the Army is required to apply for registration coverage under the Virginia Stormwater Management Program General Permit for Discharges of Stormwater from Construction Activities. Specific questions regarding the Stormwater Management Program requirements should be directed to Holly Sepety, DCR, at (804) 225-2613.

**4. Air Quality Regulations.** This project may be subject to air regulations administered by the Department of Environmental Quality. The following sections of Virginia Administrative Code are applicable:

- 9 VAC 5-50-60 *et seq.* governing fugitive dust emissions; and
- 9 VAC 5-40-5600 *et seq.*, for open burning.

Contact Albemarle County for information on any local requirements pertaining to open burning. For information regarding air permits that may be required for the installation of boilers, fuel-burning equipment or generators, contact Sharon Foley at DEQ's Valley Regional Office (telephone, (540) 574-7821).

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

- Virginia Waste Management Act (Code of Virginia Section 10.1-1400 *et seq.*);
- Virginia Hazardous Waste Management Regulations (VHWMR) (9VAC 20-60);
- Virginia Solid Waste Management Regulations (VSWMR) (9VAC 20-80); and
- Virginia Regulations for the Transportation of Hazardous Materials (9VAC 20-110).

Some of the applicable Federal laws and regulations are:

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

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

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

Contact DEQ's Valley Regional Office (telephone, (540) 574-7800) concerning the 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.

**6. Wildlife Resources.** To ensure compliance with protected species legislation, coordinate the mussel survey protocol, location, length and timing with Brian Watson, DGIF Region II Wildlife Diversity Biologist (telephone, (434) 525-7522). For additional information on DGIF's other recommendations, contact Amy Ewing of DGIF (telephone, (804) 367-2211).

**7. Transportation Impacts.** The Virginia Department of Transportation (VDOT) recommends that the Army coordinate land use requirements, lane closures, traffic control or work zone safety issues with VDOT's Culpeper Residency Office (telephone, (540) 829-7616).

**8. Regulations for Waterworks Operation and Sewer Systems.** All utility work involving installation of new water lines and appurtenances must comply with the Waterworks Regulations and all applicable standards of Albemarle County. The construction of septic and wastewater treatment systems must comply with the State's Sewerage Regulations. For more information, contact the Virginia Department of Health (Susan Douglas, telephone: (804) 864-7500).

**9. Storage Tanks.** Any questions concerning storage tank registration should be directed to Kathy Willis at DEQ's Valley Regional Office (telephone, (540) 574-7895). If evidence of a petroleum release is discovered during construction of this project, it must be reported to DEQ's Valley Regional Office (telephone, (540) 574-7800).

Colonel Brian Lauritzen  
Rivanna Station  
DEQ # 07-229F

**10. Regional and Local Coordination.** Fort Belvoir should coordinate with the Thomas Jefferson PDC (Harrison Rue, telephone (434) 979-7310) and Albemarle County (Tamara Ambler, telephone, (296) 5832, ext. 3264) to ensure that the proposed development is consistent with regional and local comprehensive plans.

Thank you for the opportunity to review the Draft Environmental Assessment for this undertaking. Detailed comments of reviewing agencies are attached for your review. Please contact me at (804) 698-4325 or Anne Pinion at (804) 698-4488 for clarification of these comments.

Sincerely,

Ellie L. Irons, Manager  
Office of Environmental Impact Review

Enclosures

cc:

Paul Kohler, DEQ-ORP  
Ron Phillips, DEQ-VRO  
Amy Ewing, DGIF  
Keith R. Tignor, VDACS  
Mary Stanley, VDOT  
Ethel Eaton, DHR  
Todd Groh, VDF  
Matt Heller, DMME  
Harrison Rue, Thomas Jefferson, PDC  
Robert Tucker, Albemarle County

Piedmont Group of the Sierra Club  
P.O. Box 5531  
Charlottesville, Va. 22905  
January 9, 2008

Brian W. Lauritzen  
Colonel, US Army  
Installation Commander  
Fort Belvoir, Virginia

Dear Colonel Lauritzen:

Thank you for inviting the Piedmont Group of the Sierra Club to comment on Ft. Belvoir's decision not to prepare an environmental impact statement for the expansion of the NGIC facility near Charlottesville. Based on a review of your environmental assessment, we commend the Army for thoughtful analyses of many environmental implications of the project.

However, the Sierra Club believes that further analyses of the environmental and other impacts of the project are warranted. The North Fork of the Rivanna River is an important natural resource in Albemarle County. Soil disturbances near the river obviously have potential to pollute the river. We see that best management practices from the 1992 Virginia Erosion and Sediment Control Handbook will be used to reduce soil erosion. We urge that stronger standards be applied. We encourage the use of native species in landscaping as far as is feasible.

We note that the environmental assessment considered the effects of the project on the real estate tax base and demand for recreation facilities. However, the report did not examine the costs to local governments of providing public education to the children of staff members who will move to the Charlottesville/Albemarle area. This impact could be quite large. In addition, the expansion of intelligence work at the facility surely will elevate the attractiveness of the facility as a target of terrorist attacks. Some consideration of potential increases of risks and community consequences of attacks seem due.

Finally, we did not receive your letter of 10 December until 31 December. This has left us only about a week to develop comments on a substantial project. We understand that Albemarle County has requested a thirty-day extension of the public comment period. We support this request.

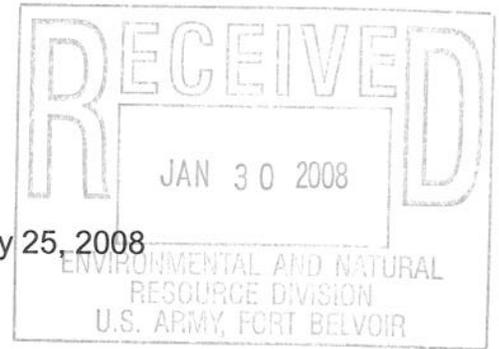
We hope our remarks will be of value.

Sincerely,

Tom Olivier, Conservation Chair

John A. Cruickshank, Chair





January 25, 2008

Colonel Brian W. Lauritzen  
U. S. Army Installation Commander  
U. S. Army Garrison Fort Belvoir  
9430 Jackson Loop, Suite 100  
ATTN: IMNE-BEL-PW  
Fort Belvoir, Virginia 22060-5116

Re: NGIC Expansion

Dear Colonel Lauritzen:

We have reviewed the Draft Finding of No Significant Impact, dated December 20, 2007, and the Draft Environmental Assessment for Expansion of Rivanna Station; Charlottesville, Virginia dated December 2007, and offer the following comments:

#### 3.4 Infrastructure and Utilities

1. 3.4.1 Potable Water Supply: The Rivanna Water and Sewer Authority (RWSA) does own and operate the North Fork Rivanna Water Treatment Plant (NFRWTP). The Albemarle County Service Authority (ACSA) provides potable water service through the public distribution system to the existing NGIC building.
2. 3.4.1 Potable Water Supply: Based upon consumption records of the ACSA, the average daily demand for the NGIC building over the past 12 months is 20,570 gallons.
3. 3.4.2 Sanitary Sewer: The ACSA also provides sanitary sewer service to the existing NGIC building through the public wastewater collection system. Wastewater from the existing NGIC building is treated at the Camelot Wastewater Treatment Plant (Camelot WWTP). The Camelot WWTP is owned by the ACSA and is operated by the RWSA under a Virginia Pollutant Discharge Elimination System (VPDES) permit from the Virginia Department of Environmental Quality (VDEQ).

#### 4.4 Impacts on Infrastructure and Utilities

1. This past fall RWSA directed their consultant, Hazen and Sawyer to conduct an analysis of the Camelot WWTP to verify the capacity of the treatment facility. The plant is currently permitted for a flow rate of 200,000 gallons per day (gpd) and is treating an

average influent flow of 120,000 gpd. The analysis determined that the strength of the influent wastewater has increased significantly over the original design value of the plant; and the flow entering the plant varies significantly over the course of the day with peak flows of up to four to six times the average flow. The plant is currently operated with one-half of the secondary treatment volume dedicated to flow equalization to dampen the high strength wastewater loading and the hydraulic spikes. As a result, Hazen and Sawyer concluded that the plant capacity in this configuration is limited to 120,000 gpd; therefore, the plant is currently at its limiting capacity. At this time, no additional sewer flow can be accepted into the Camelot WWTP. The ACSA and RWSA have determined the short-term solution to improve the treatment capability of the Camelot WWTP is the construction of a flow equalization tank at the plant. Hazen and Sawyer is currently designing the flow equalization tank and geotechnical investigation of the site is underway. At this time, the ACSA and RWSA do not have an exact schedule when the modifications will be approved and completed. The ACSA and RWSA are working closely and expeditiously, to make the modifications to enable the Camelot WWTP to operate at the level it is permitted.

2. The ACSA is conducting a detailed investigation of the wastewater system, which transports wastewater to the Camelot WWTP, to identify sources of high strength sewerage and eliminate it.
3. In addition to the analysis of the Camelot WWTP, the RWSA is completing a Comprehensive Sanitary Sewer Study, which analyzes the wastewater collection basin of the Camelot WWTP. The RWSA consultant for this study, Greeley and Hansen, was tasked with determining the most cost effective long-term solution to the limited capacity of the Camelot WWTP. Their preliminary engineering report recommended a regional wastewater pump station as the preferred alternative. Given the current proposed projects and the potential densities envisioned by the County of Albemarle Comprehensive Plan, it is clear the Camelot WWTP does not have the capacity to accommodate the entire drainage basin. For this reason, the ACSA wishes to move forward as quickly as possible with the design and construction of the regional wastewater pump station. To this end, the ACSA is hosting a meeting with all stakeholders who would be served by this regional wastewater pump station on January 31, 2008. Representatives from the Directorate of Public Works, Fort Belvoir and NGIC have been invited to this meeting and plan to attend.
4. There are no public wastewater lift stations or pumps, which currently serve the existing NGIC facility.

5. The public sewer mains serving the existing NGIC facility were constructed in 2001 and are 10-inches in diameter. The mains are either ductile iron or SDR35 PVC and it is unlikely their condition has deteriorated over the past seven years.

We trust this information is sufficient for your needs. Let us know if you have any questions.

Sincerely,



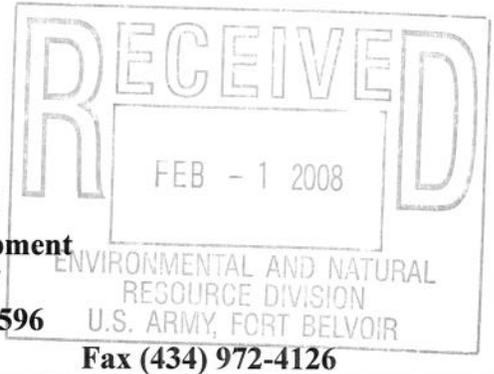
Peter C. Gorham, P.E.  
Director of Engineering

PCG/dbh

Cc: Tamara Ambler, Natural Resources Manager – Albemarle County



**COUNTY OF ALBEMARLE**  
**Department of Community Development**  
**401 McIntire Road, Room 227**  
**Charlottesville, Virginia 22902-4596**



**Phone (434) 296-5832**

**Fax (434) 972-4126**

January 22, 2008

Commander  
U.S. Army Garrison Fort Belvoir  
9430 Jackson Loop, Suite 100  
ATTN: IMNE-BEL-PW  
Fort Belvoir, VA 22060-5116

Thank you for the opportunity to review the Finding of No Significant Impact based upon the Draft Environmental Assessment for the Expansion of Rivanna Station in Charlottesville, Virginia. Our comments are provided below for your consideration, in accordance with the agreed upon revised deadline of January 25, 2008.

1. In general the proposed use is compatible with surrounding uses and the County's current and future land use plans for the area. Most of the project is located within one of the County's designated Development Areas, so development of this type is appropriate. The southeastern portion of the study area is outside of the Development Area, in the Rural Area. Please note that the County is currently undertaking a Development Area master planning process that includes the project area - *Places29*. The County recommends that the project be considered in the context of this master plan.
2. Please clarify the boundaries of the proposed project area (See Fig 1-2, pg 1-9). There is mention of acquiring parcels north of Boulders Road at some time in the future, but the document never indicates if the project area represents the proposed acquisition. It is noted that the shown project area includes privately held property south of Boulders Road, though the report suggests only property north of Boulders Road is yet to be acquired. This area includes the defined project area that is located outside of the designated Development Area. Please clarify what activities or uses are proposed for this area.
3. The Study does not identify specific improvements proposed by the applicant that would offset the transportation impacts attributable to the site. The Study indicated that the overall LOS for the Route 29/Boulder Road intersection will be F in the year 2015. While background traffic increases are expected, this project does accelerate the need for offsite road improvements and contributes to the need for those improvements. VDOT has not allocated construction funds for the widening of Route 29 in Albemarle County in its Six Year Financial Plan. There could be significant delays on Route 29 in the vicinity of the site if these improvements are not in place when the improvements at NGIC are completed. Other projects in this area have committed to create a six lane road for 1,000' at each side of their entrances on Route 29. Those improvements reduced the length of traffic queues at the traffic signals and improved the level of service at the intersections. Recognition that similar improvements are warranted in this situation seems appropriate.

4. Please clarify how the proposed property acquisition is necessary to address security issues. Also, please indicate what additional facilities are envisioned for the project area. Staff has noted that the project area appears to extend much further than necessary to address the security issues raised in this report. Additionally, it is noted the limit of this project area appears to subdivide some existing parcels, suggesting a defined reason for setting the limit of the project area at that point. This leads some in the community to suspect that additional facilities are already envisioned but not identified as part of this environmental assessment. Additional facilities beyond what is considered in the draft EA could alter the findings of this report with respect to community services and transportation impacts, among other issues.
5. Please address how the privately owned proposed development currently under review by Albemarle County (parts of Tax Map 33, Parcels 1D and 1F, Albemarle County Site Development Plan 2007-078) will influence or be influenced by this project. The Environmental Assessment notes this proposed development on page 3-2, but does not address the overlap between the development and the project area.
6. Please coordinate with the Albemarle County Service Authority on sewer capacity available for this property. Section 3.4.2 – Sanitary Sewer does not consider available capacity for future connections but there are known issues with sewer capacity in this area.
7. The original NGIC project on this facility made a strong commitment to protecting water resources by having Albemarle County approve both an Erosion and Sediment Control Plan and Stormwater Management Plan for that facility and then working with county staff to implement the approved plan. A similar level of commitment would be appreciated by Albemarle County with this project. Therefore the County requests that the design of this project meet local requirements for erosion and sediment control, stormwater management, and stream buffer protection. Staff also notes the Environmental Assessment describes a commitment to Low Impact Development and LEED-NC. Albemarle County appreciates the commitment to enhanced water resource protection, and recommends that rainwater harvesting also be included as a design component.
8. Please indicate how the 1000+ new workers and their families might impact area schools.
9. Please indicate how the facility design is being coordinated with the Albemarle County Police and Fire/Rescue.
10. The University of Virginia's Astronomy Department is one of the largest astronomy departments in the Southeast, is a world leader in innovation and cutting edge science, and operates two local observatories. For these reasons the community has a vested interest in protecting dark skies from excessive lighting. Albemarle County's Comprehensive Plan directly addresses the issue (see "The Dark Sky": [http://www.albemarle.org/upload/images/forms\\_center/departments/community\\_development/forms/Comprehensive\\_Plan/NATURAL\\_RESOURCES\\_&\\_CULRURAL\\_ASSETS\\_10\\_The\\_Dark\\_Sky.pdf](http://www.albemarle.org/upload/images/forms_center/departments/community_development/forms/Comprehensive_Plan/NATURAL_RESOURCES_&_CULRURAL_ASSETS_10_The_Dark_Sky.pdf)) and Albemarle County's Zoning Ordinance has requirements for minimizing light spillover (18-4.17: [http://www.albemarle.org/upload/images/forms\\_center/departments/county\\_attorney/forms/Albemarle\\_County\\_Code\\_Ch18\\_Zoning04\\_General\\_Regulations.pdf](http://www.albemarle.org/upload/images/forms_center/departments/county_attorney/forms/Albemarle_County_Code_Ch18_Zoning04_General_Regulations.pdf)). Staff believes it would be appropriate for the Environmental Assessment to demonstrate a commitment to honor Albemarle County's interest in

protecting dark skies, and requests that the project design meet local lighting requirements to the greatest extent feasible.

11. With respect to the facilities response to Executive Orders 13101 and 13148 on page 6-8, staff applauds Fort Belvoir for committing to achieve LEED-NC at the Silver level. Given both Albemarle County and the City of Charlottesville have made a similar commitment with their facilities, this level of environmental leadership is appreciated.
12. While there are currently no regular transit routes that run north on Route 29 to the NGIC site, the County fully anticipates transit service to be provided along the Route 29 corridor in the future. The County has already obtained transit proffers from developments along the corridor and is anticipating expansion of transit along the corridor in long range transportation plans. The County recommends that the new NGIC site should be transit-ready and NGIC provide financial assistance to the County for transit service to the site. In addition, consideration should be given to providing vanpool/carpool services, supporting local Park-and-Ride and Ride-Share programs to serve employees commuting to and from work, and providing shuttle services during the day which connect to area service/employment centers to meet employee and nearby contractor work-day trip demands. In addition, other traffic management strategies should be implemented, such as staggering shift hours. These efforts could reduce the potential traffic impacts on the existing road system.
13. In support of the County's interest in maintaining biodiversity of natural resources, it is recommended that replacement vegetation and other mitigation measures consider the provision of appropriate habitat for indigenous species (e.g. Indiana bat).
14. The study incorrectly associates UVA's Research Park and the Northside Industrial Park with the Community of Piney Mountain. These industrial areas are in the adjacent Hollymead Community. The GE-Fanuc facility is within Piney Mountain, but not identified in the study.

Again, thank you for consideration of our comments. If you require any additional information I can be reached at (434) 296-5832 ext. 3264 or by email at [tambler@albemarle.org](mailto:tambler@albemarle.org).

Sincerely,



Tamara Jo Ambler  
Natural Resources Manager

Cc: Project File



*Thomas  
Jefferson*

## Planning District Commission

Sustainable solutions to regional issues

### City of Charlottesville

David E. Brown  
Jason Pearson

### Albemarle County

Sally H. Thomas  
David Wyant

### Fluvanna County

Charles W. Allbaugh, CPA, Chair  
Grant Tate

### Greene County

Jeri Allen  
Carl Schmitt

### Louisa County

Fitzgerald Barnes  
Jackson Wright

### Nelson County

Fred Boger  
Connie Brennan

### Executive Director

Harrison B. Rue

January 11, 2008

Mrs. Anne N. Pinion  
Department of Environmental Quality  
Office of Environmental Impact Review  
629 East Main Street, 6<sup>th</sup> floor  
Richmond, VA 23219

Dear Mrs. Pinion:

The Thomas Jefferson Planning District Commission reviewed the Environmental Assessment for the Expansion of the Rivanna Station (Department of Defense) at its January 3, 2008 meeting. The Commission had a number of comments on the EA, beginning with the need for more time for local staff to comment. Recognizing that copies of the EA were not available locally until January 2, the Commission supports the request of Albemarle County staff for an extension of the comment period for 30 days from that time in order to allow adequate review. The Commission also had the following comments:

- Clarification is needed regarding the amount and location of additional land to be purchased. The EA refers to the purchase of three parcels totaling 50 acres, but the FONSI mentions a “proposed purchase of approximately 100 acres.” Albemarle County staff have indicated that they cannot determine which parcels correspond to the proposed purchase.
- Clarification is needed regarding what a “Community Support Facility” that may be developed on the additional land to be purchased might entail.
- Obtaining LEED certification is strongly encouraged. Commissioners requested special attention to stormwater runoff; as stated in the LEED Specifications for New Construction (U.S. Green Building Council, October 2005): “Implement a stormwater management plan that prevents the post-development peak discharge rate and quantity from exceeding the pre-development peak discharge rate and quantity for the one- and two-year 24-hour design storms.”
- For development of interior roads and parking lots, the Commission recommends using “green street” design as shown in the attached excerpt from the TJPDC’s US-29-Hydraulic-250 Bypass Intersections Study (29H250), to minimize stormwater runoff and heat island effects.
- Some concern about whether the expansion of the facility could really be considered a minor factor in the degradation of the intersection was expressed. It was also pointed out that the VDOT Long-Range Plan does not actually include widening Route 29 as far north as NGIC, so this is unlikely to be a source of traffic relief in the near future. The Commissioners strongly encourage planning to facilitate the use of transit, travel demand management,

and the use of RideShare to minimize automobile trips to the expanded facility to the greatest extent possible. In particular, planning for transit access and a waiting area (sited as necessary to meet security requirements) is recommended.

Thank you for the opportunity to comment on the Environmental Assessment.

Sincerely,

A handwritten signature in black ink, appearing to read "H. Rue", with a long horizontal flourish extending to the right.

Harrison Rue  
Executive Director

Over a seven year time period, Option B provides the greatest positive impact on existing properties' development potential.

In terms of tax revenues seven years after the transportation improvements, the implications of all Options are provided in Table AE 6 below.

**Table AE 6. Net New Tax Revenues**

<u>Area</u>	<u>A-1</u>	<u>A-2</u>	<u>B-1/2</u>	<u>C</u>
Triangle Area	\$480,400	\$468,500	\$853,700	\$376,100
Kmart Area	\$220,800	\$194,500	\$635,000	\$69,000
Best Buy Area	\$216,900	\$216,400	\$216,900	\$222,400
Holiday Inn Area	\$27,300	-\$29,400	\$26,400	\$40,000
250 Interchange Area	\$97,300	\$97,300	-\$31,600	\$97,400
Hillsdale	\$554,400	\$554,400	\$554,400	\$554,400
Barracks Road Area	\$32,845	\$32,845	\$0	\$0
Net New Revenue	\$1,629,945	\$1,534,545	\$2,254,800	\$1,359,300

Fiscal impacts range from \$1.4 to \$2.25 million per year depending upon the transportation Option selected. At an interest rate of 5 percent over 20 years this stream of new tax revenue could generate \$17 to \$28 million in capital. Option B provides the highest net return of the three Options.

## Environment

### Green Streets

The construction of new roadways and the possible redevelopment of significant portions of land in the project area provide the unique opportunity to implement measures to reduce the extent of impervious surfaces, and attenuate and treat polluted urban runoff from within the public right of way and that from private development. The latter includes runoff from roofs and paved surfaces, such as parking lots and driveways. The following paragraphs focus on the discussion of design solutions for runoff from the public right of way. In addition, solutions for parking lots are presented here because of the prevalence and extent of parking lots in the project area today and in the foreseeable future. This approach improves the quality of existing open spaces and drainages while helping to ensure a new lush landscaped character for the area.

While a reduction in the amount of runoff flows and water quality treatment can be achieved by using a 'pipe and pond' approach combined with mechanical filter systems, they can be achieved in a more sensible and environmentally sustainable way by employing an approach often referred to as 'Green Streets'<sup>5</sup>. Green Streets solutions help control stormwater while enriching the character of urban neighborhoods. The approach is based in the understanding that pedestrian-oriented street facilities can be designed in such a way to achieve water management goals as well as pedestrian goals. In particular, the same landscaping components of a street that add to pedestrian comfort can also perform stormwater retention and treatment functions, contributing to better flood control and water quality. Planting strips, planted medians, tree wells, and other

<sup>5</sup> Metro, 'Green Streets – Innovative Solutions for Stormwater and Stream Crossings', Portland, June 2002.

planted areas can reduce urban runoff by retaining stormwater. The soils in these planted areas also remove pollutants as it filters through or runs off, providing natural water treatment. Paved areas, such as parking lots and lanes, sidewalks, and ball courts, if designed with porous surfaces and ample reservoir or infiltration capabilities beneath, can be used to improve water management. Considering these ideas will ensure that environmental sustainability and quality-of-life objectives are incorporated into the planning and engineering analyses of collection system improvements.

Green Streets design elements appropriate for the project area include the following:

- Use of permeable paving materials (illustrated in Figure AE 6);
- Filter strips and swales in street medians (illustrated in Figure AE 7);
- Linear detention basins (illustrated in Figure AE 8); and
- Street tree wells (illustrated in Figure AE 9).

These elements can be used individually or in combination depending on the envisioned overall stormwater collection system. Figure AE 10 shows an illustrative example of how some of these features can be integrated into a street similar to the proposed Hillsdale Drive extension and Figure AE 11 illustrate how swales and permeable paving can be integrated into the design of a parking lot.

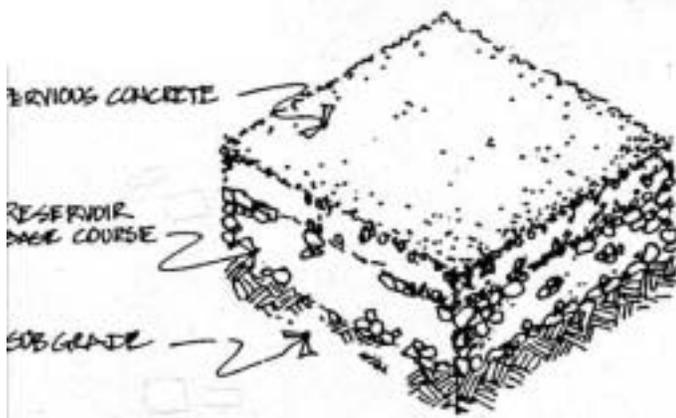
It is important to plan the implementation of green streets solutions as an overall system or network of elements and to include the tie-ins with the existing natural and built drainage system in the area. The diagram of the potential future land use pattern (see Figure AD 27) discussed earlier illustrates how existing elements of the natural drainage system in the project area can be woven into the emerging new land use pattern, and provide excellent opportunities for the tying in of green streets elements constructed within and adjacent to public right of ways.

Both Albemarle County and Charlottesville are in the process of reviewing current stormwater and watershed protection ordinances, allowing introduction of these design solutions as preferred options in site design review of developments.

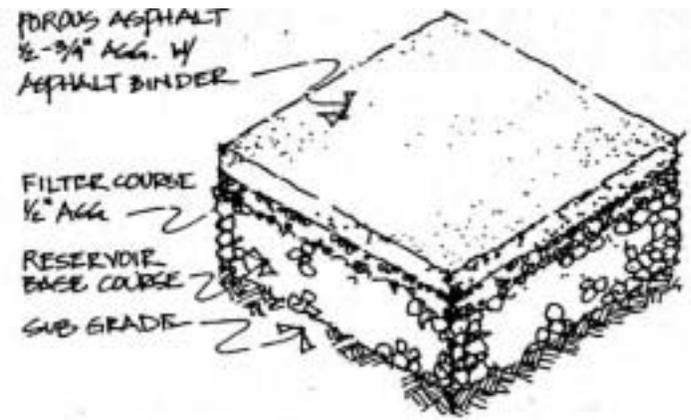
### **Construction Cost**

~~Costs for design and construction of the transportation options were prepared by the Virginia Department of Transportation. Construction costs were developed on the basis of quantities of materials calculated from the designs developed for the transportation options using locally applicable unit costs. Right of way costs were estimated on the basis of VDOT experience for property acquisition in the Albemarle County area using estimates of takings developed from the designs. To complete the cost estimates, VDOT also estimated engineering design costs to prepare construction documents. Figure AE 12 shows a summary of construction cost for the transportation options with a standard boulevard design on US-29 north of Hydraulic.~~

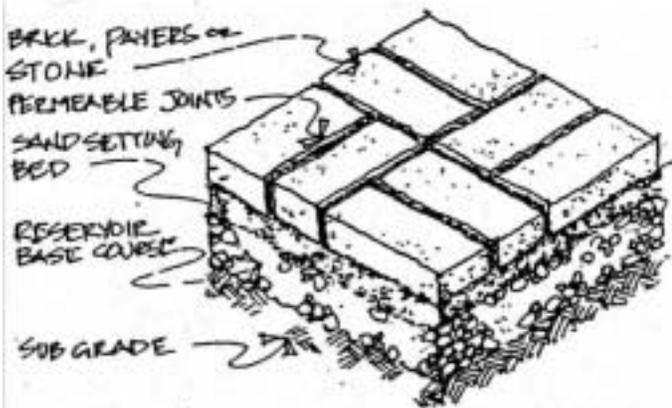
# Figure AE 6: Green Streets Solutions - Permeable Pavement



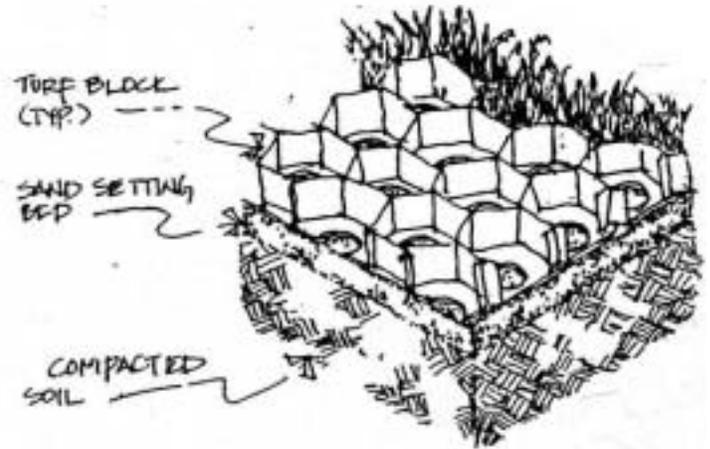
a) Pervious concrete.



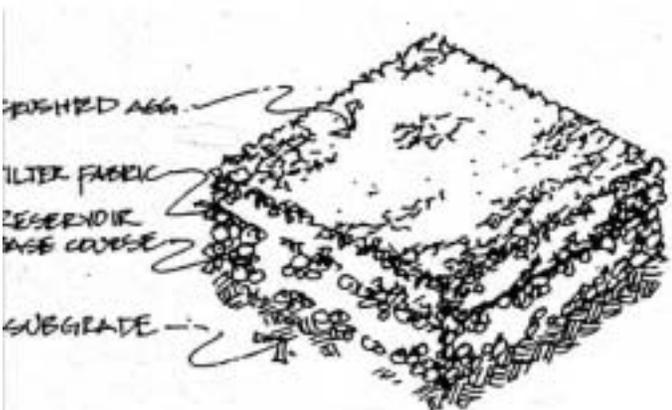
b) Porous asphalt.



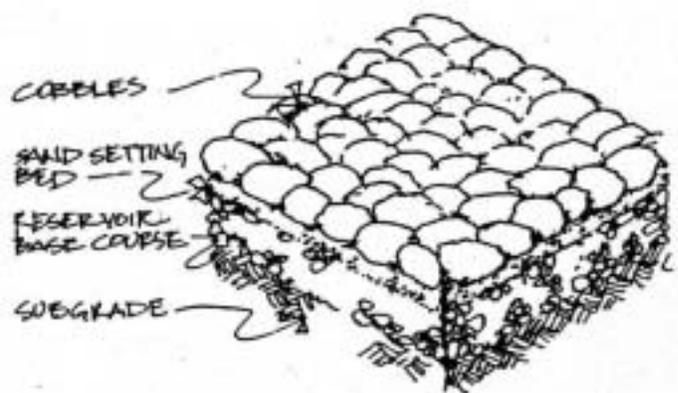
c) Unit pavers/bricks/stone



d) Turf block.



e) Crushed aggregate



f) Cobbles.

Figure AE 7: Green Streets Solutions - Swales

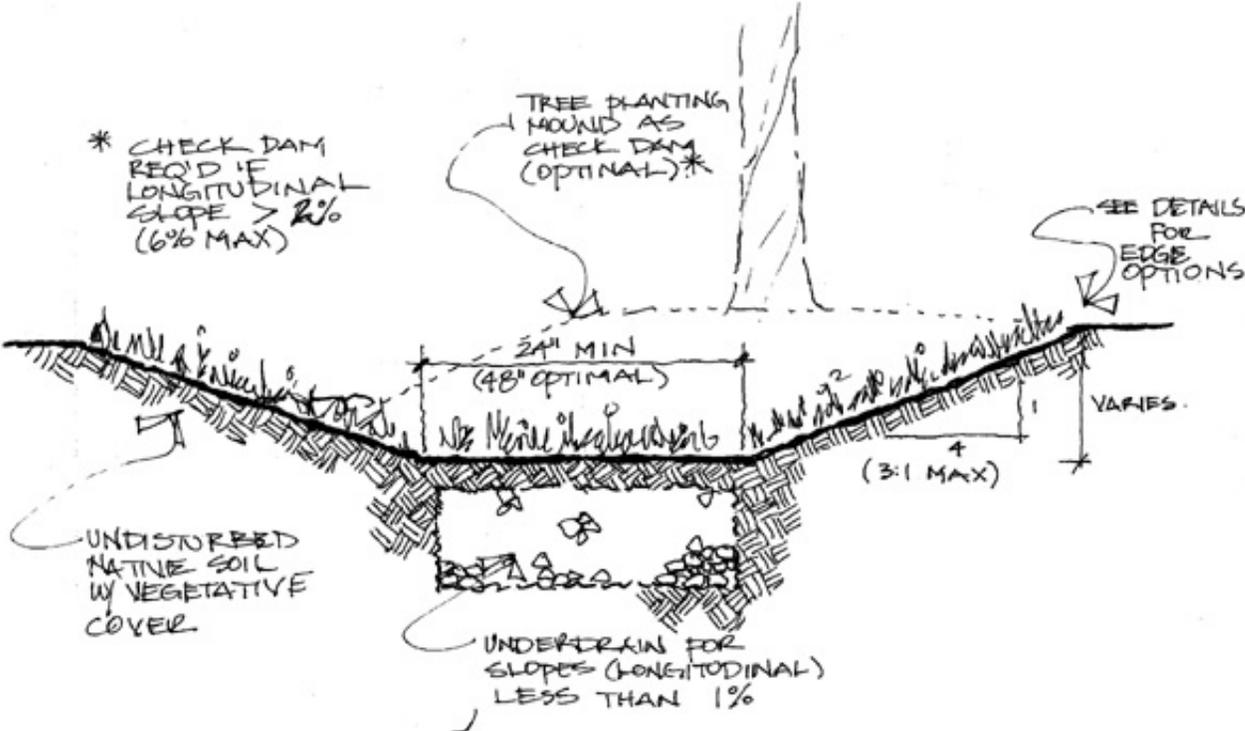


Figure AE 8: Green Streets Solutions - Linear Detention Basin

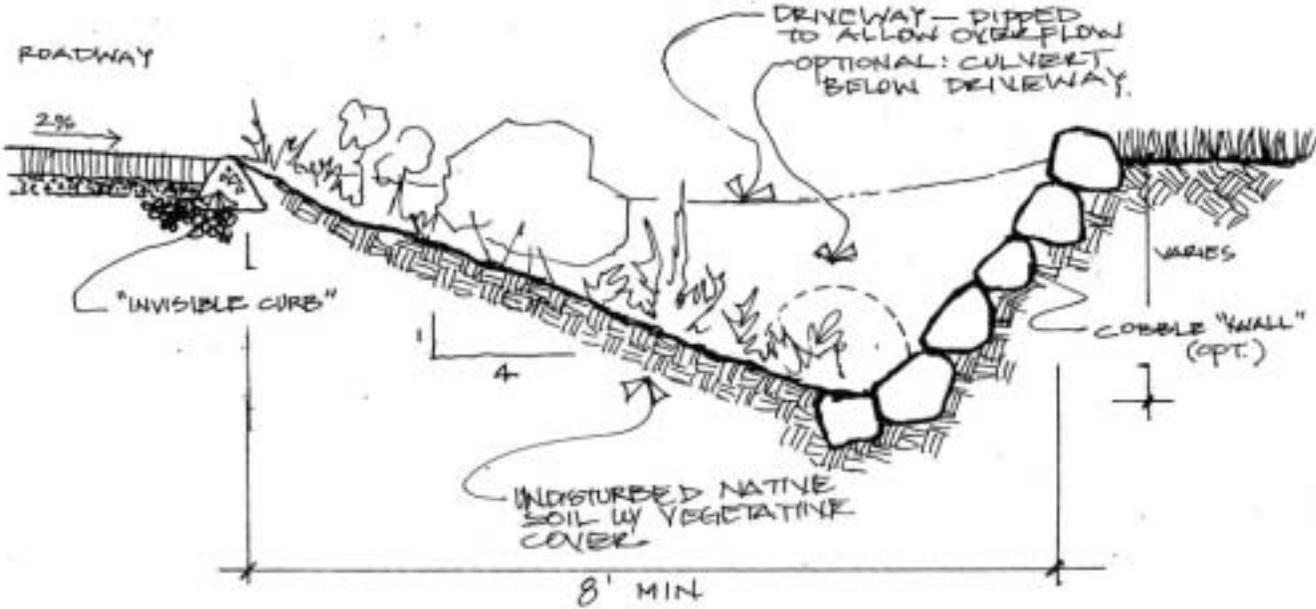
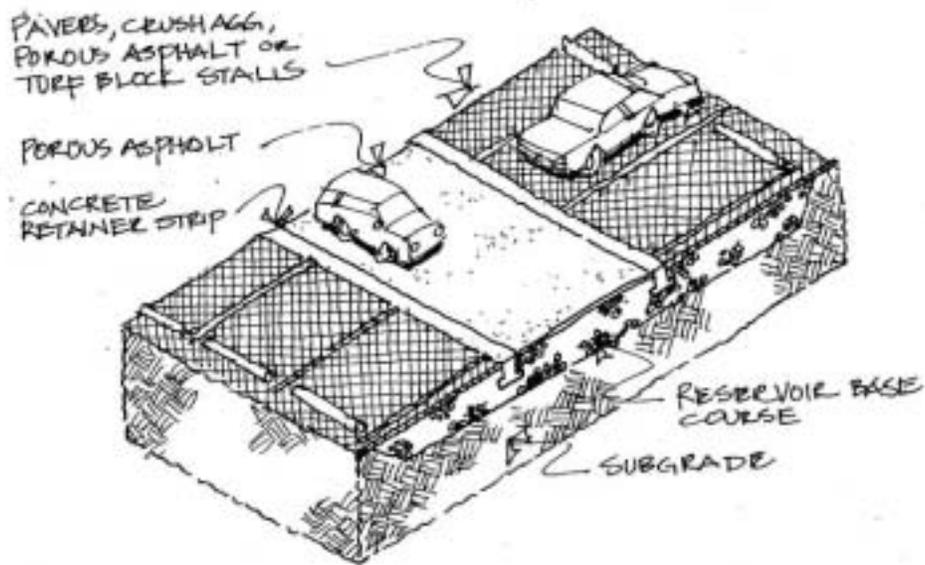
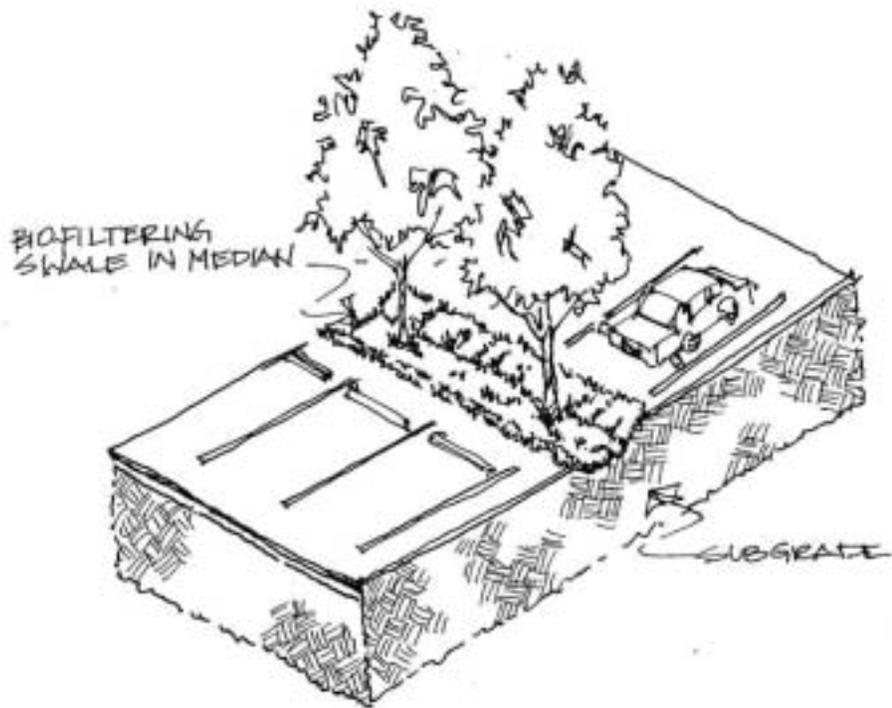




Figure AE 11: Green Streets Solutions - Example Parking Lot



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FOR EXPANSION OF RIVANNA STATION

Comment Summary #	Reviewer Comment #	Page	Comment	Name of Reviewer	Source of Reviewer Comment	Location of action to address comment.					Action Taken in EA to Address the Comment Fort Belvoir concurs and intends to follow all applicable Army regulations and local, state and Federal laws and regulations	
						Chapter	Section	Page	Paragraph	Sentence		
1	1c	4-18	Since wetlands are to be impacted, a Virginia Water Protection (VWP) permit must be obtained from DEQ prior to construction. A Joint Permit Application (JPA) for a VWP permit must be submitted to DEQ for approval in accordance with 9 VAC 25-210-50. A VWP permit must be approved prior to commencement of any land-disturbing activity on the site.	DEQ, Division of Water Quality Programs	Coordinated Comments Letter, Dated 22-Jan-2008							Fort Belvoir concurs and intends to follow all applicable Army regulations and local, state and Federal laws and regulations
2	2a		The Virginia Marine Resources Commission (VMRC) serves as the clearinghouse for the JPA used by the U.S. Army Corps of Engineers (Corps) for issuing permits pursuant to Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act. DEQ for issuance of a Virginia Water Protection permit, VMRC for encroachments on or over state-owned subaqueous beds as well as tidal wetlands, and local wetlands board for impacts to wetlands. VMRC will distribute the completed JPA to the appropriate agencies. Each agency will conduct its review and respond.	VMRC	Coordinated Comments Letter, Dated 22-Jan-2008							Fort Belvoir concurs and intends to follow all applicable Army regulations and local, state and Federal laws and regulations
3	3a	4-24, 4-27	Accordingly, the Army should prepare and implement erosion and sediment control (ESC) and stormwater management (SWM) plans to ensure compliance with state law. The Army is highly encouraged to contact DCR's James Watershed Office and/or the local ESC and SWM authorities to obtain plan development, implementation assistance and to ensure project conformance during and after active construction.	DCR, Division of Soil and Water Conservation	Coordinated Comments Letter, Dated 22-Jan-2008							Fort Belvoir concurs and intends to follow all applicable Army regulations and local, state and Federal laws and regulations
4	3b	4-27	Therefore, for projects involving land-disturbing activities of 1 acre or more, the applicant or its authorized agent is required to apply for registration coverage under the General Permit for Discharges of Stormwater from Construction Activities.	DCR, Division of Soil and Water Conservation	Coordinated Comments Letter, Dated 22-Jan-2008							Fort Belvoir concurs and intends to follow all applicable Army regulations and local, state and Federal laws and regulations
5	4b	4-8, 4-28	The DEQ-Valley Regional Office states that the Draft EA addresses anticipated impacts and regulatory requirements associated with air permitting.	DEQ, Division of Air Quality	Coordinated Comments Letter, Dated 22-Jan-2008							Fort Belvoir concurs and intends to follow all applicable Army regulations and local, state and Federal laws and regulations
6	4c	4-8, 4-28	If project activities include the burning of construction or debris material, this activity must meet the requirements under 9 VAC 5-40-5600 et seq. of the Regulations for open burning, and it may require a permit. The Regulations provide for, but do not require, the local adoption of a model ordinance concerning open burning. The Army should contact County officials to determine what local requirements, if any, exist.	DEQ, Division of Air Quality	Coordinated Comments Letter, Dated 22-Jan-2008	4	4.3.1.2	4-9	3	1 & 2		Modified text to include Albemarle County Open Burning Ordinance.
7	4d	4-8, 4-28	During debris removal and 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.	DEQ, Division of Air Quality	Coordinated Comments Letter, Dated 22-Jan-2008							Fort Belvoir concurs and intends to follow all applicable Army regulations and local, state and Federal laws and regulations
8	4e	4-8, 4-28	An air permit may be required for any new boilers, fuel-burning equipment or emergency generators.	DEQ, Division of Air Quality	Coordinated Comments Letter, Dated 22-Jan-2008							Fort Belvoir concurs and intends to follow all applicable Army regulations and local, state and Federal laws and regulations
9	5c	3-12, 3-40	DEQ encourages all construction projects and facilities to implement pollution prevention principles, including: the reduction, reuse, and recycling of all solid wastes generated, and the minimization and proper handling of generated hazardous wastes.	DEQ, Virginia Waste Management Board	Coordinated Comments Letter, Dated 22-Jan-2008							Fort Belvoir concurs and intends to follow all applicable Army regulations and local, state and Federal laws and regulations

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10	6f	4-24	Due to the legal status of the Atlantic pigtoe, DCR recommends coordination with DGIF to ensure compliance with protected species legislation. To minimize adverse impacts to the aquatic ecosystem as a result of the proposed activities, DCR also recommends the implementation of and strict adherence to applicable state and local erosion and sediment control/storm water management laws and regulations.	DCR, Division of Natural Heritage	DEQ Coordinated Comments Letter, Dated 22-Jan-2008	4	4.8.5.1, 4.13	4-26; 4-33	3; 2	3; Last Bullet		Modified text to include that Fort Beavor will coordinate with DGIF and/or FWS during wetland permitting and section 7 for James Spiny mussel and coordination for the Atlantic Pigtoe Mussel will occur at that time as well to determine conservation and mitigation measures to be employed
11	7b	4-24	The Draft EA states (page 4-24) that surveys for the James spiny mussel, Atlantic pigtoe and the Indiana bat would be completed prior to the start of construction. In addition, the Army has completed a suitable habitat survey for the Appalachian grizzled skipper and determined that the required shale barriers needed for its habitat are not likely present. DGIF supports the recommendation that mussel surveys be performed at the project site prior to construction. DGIF does not support proposals to mitigate wetland impacts through the construction of stormwater management ponds, nor does it support the creation of in-stream stormwater management ponds. DGIF is willing to assist the applicant in developing a plan that includes open-space, wildlife habitat, and natural stream channels which retain their wooded buffers. DGIF does not document the federal endangered Indiana bat in the immediate project area, however, it appears that habitat for this species will be adversely impacted by the development of this site. Therefore, DGIF supports comments provided by the U.S. FWS and DCR regarding the Indiana bat.	DGIF	DEQ Coordinated Comments Letter, Dated 22-Jan-2008	4	4.8.5.1 & 4.13	4-26; 4-33	3; 2	3; Last Bullet		Modified text to include that Fort Beavor will coordinate with DGIF and/or FWS during wetland permitting and section 7 for James Spiny mussel and coordination for the Atlantic Pigtoe Mussel will occur at that time as well to determine conservation and mitigation measures to be employed. Fort Beavor intends to complete an Indiana Bat habitat survey.
12	7c	4-24	According to DGIF's records, the federal endangered James spiny mussel and state threatened Atlantic pigtoe have been documented in the project area. The North Fork Rivanna River has been designated a Threatened and Endangered Species Water due to the presence of these species. It has also been designated a Potential Anadromous Fish Use Area.	DGIF	DEQ Coordinated Comments Letter, Dated 22-Jan-2008	4	4.8.5.1 & 4.13	4-26; 4-33	3; 2	3; Last Bullet		modify text to state section 7 consultation will occur.
13	8b		The DIMME states that the project does not pose an impact to mineral resources of the Commonwealth.	DMME, Division of Mineral Resources	DEQ Coordinated Comments Letter, Dated 22-Jan-2008							Fort Beavor concurs.
14	9a		The Department of Forestry (DOF) states that the project will have limited impact to the overall forest resources of the Commonwealth.	DOF	DEQ Coordinated Comments Letter, Dated 22-Jan-2008							Fort Beavor concurs.
15	10a	4-3	The traffic study uses a 3% growth rate for determining the background traffic on Route 29. Based on VDOT historical data, the growth trend for this portion of Route 29 is 0.80 %. This will reduce the projected demand on the intersection of Route 29 and Boulders Road.	VDOT	DEQ Coordinated Comments Letter, Dated 22-Jan-2008	4	4.2.1.1	4-4; 4-5	1; 2	3-4; 1		Modified Text
16	10a	4-3, 4-5	The study does not include the approved residential development planned for the west side of Route 29. The development will construct the western leg to the intersection of Route 29 and Boulders Road and provide improvements to the intersection. The construction will change the intersection configuration, traffic patterns and signal timing.	VDOT	DEQ Coordinated Comments Letter, Dated 22-Jan-2008	4	4.11	4-30	3	1-3		Modified Text
17	10a	4-5	The Draft EA (page 4-5) and traffic study states that VDOT's Long Range Plan is to widen Route 29 North to the Greene County Line. The widening of Route 29 north of Airport Road (Route 649) is not currently in any plan or forecast model and should not be considered as a solution for traffic congestion at this intersection. Route 29 from Route 643 (Polo Grounds Road) to Route 649 (Airport Road) will be widened, but this section of Route 29 is south of Rivanna Station. In addition the North Point Development in conjunction with the North Fork Research Park have proffered to widen Route 29 from Route 649 (Airport Road) to Route 1571 (Lewis and Clark Drive), but this is also south of Rivanna Station.	VDOT	DEQ Coordinated Comments Letter, Dated 22-Jan-2008	4	4.2.1.1, 4.11	4-5; 4-30	1; 4	1; 1-2		Modified Text

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Comment Summary #	Rever Comment #	Page	Comment	Name of Reviewer	Source of Reviewer Comment	Location of action to address comment				Action Taken in EA to Address the Comment	
						Chapter	Section	Page	Paragraph		Sentence
18	10a	4-3, 4-5	Based on the US 29 North Corridor Transportation Study, the Route 29 corridor through this area was reviewed and the Bouliders Road/Route 29 intersection was analyzed. The review included the expansion proposed for the NGIC site and the approved development west of Route 29, with growth projected through 2025. The analysis showed Levels of Service (LOS) C for the overall intersection in the future and did not recommend widening Route 29 through this area. However the side street approaches to the intersection will experience a LOS E in the PM peak hour and a LOS D on the northbound approach to Route 29.	VDOT	DEQ Coordinated Comments Letter, Dated 22-Jan-2008	4	4.2.1.1	4-4 & 4-5	2 & 1	3 & 1	Modified Text
19	10a	4-5	The LOS for the Bouliders Road/Route 29 intersection is of concern to VDOT. The Draft EA identifies the widening of Route 29 as the solution, but it does not address or provide assistance for that goal.	VDOT	DEQ Coordinated Comments Letter, Dated 22-Jan-2008	4	4.2.1.4	4-5	5	First & Second Bullet	Modified Text
20	10b	4-3	An aggressive Ride Share, Transit and Travel Demand Management Program could reduce to a nominal amount the vehicle trips to and from the site. However, in the future (2025 and beyond), other solutions must be identified and implemented in order to maintain an acceptable Level of Service at this intersection. VDOT recommends that any land use requirements, lane closures, traffic control, or work zone safety issues should be closely coordinated with VDOT's Culpeper Residency Office.	VDOT	DEQ Coordinated Comments Letter, Dated 22-Jan-2008	4	4.2.1.4	4-5	5	Second Bullet	Modified Text
21	11b	4-25	DHR states that it previously commented directly to the Army. DHR determined that the proposed project will not affect historic properties provided that the cemetery is avoided. DHR has no further comment at this time.	DHR	DEQ Coordinated Comments Letter, Dated 22-Jan-2008						Fort Belvoir concurs
22	12a	3-39, 4-24, 4-25	Any questions concerning registration for storage tanks should be directed to DEQ's Valley Regional Office. Also, if evidence of a petroleum release is discovered during construction of this project, it must be reported to DEQ's Valley Regional Office. Petroleum contaminated soils and ground water generated during construction of this project must be properly characterized and disposed of properly.	DEQ, Valley Regional Office	DEQ Coordinated Comments Letter, Dated 22-Jan-2008						Fort Belvoir concurs and intends to follow all applicable Army regulations and local, state and Federal laws and regulations
23	13a		The Virginia Department of Health finds that the project should have no adverse impact to public water supplies.	DOH	DEQ Coordinated Comments Letter, Dated 22-Jan-2008						Fort Belvoir concurs and intends to follow all applicable Army regulations and local, state and Federal laws and regulations
24	14	4-23	The use of herbicides or pesticides for 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.	DACS	DEQ Coordinated Comments Letter, Dated 22-Jan-2008	4	4.8.4.1	4-25	5	2	Modified text to reflect that Rivanna Station facility was added to Fort Belvoir's IPM Program and Installation Pest Management Plan in 2005
25	15a		Consider development of an effective Environmental Management System (EMS)	DEQ, Office of Pollution Prevention	DEQ Coordinated Comments Letter, Dated 22-Jan-2008	4	4.4.1	4-12	5	1	Modified text to state Rivanna Station will be integrated into Fort Belvoir EMS
26	15a		Consider environmental attributes when purchasing materials.	DEQ, Office of Pollution Prevention	DEQ Coordinated Comments Letter, Dated 22-Jan-2008	4	4.4.1	4-12	5	2	Modified text to state Rivanna Station will at a minimum meet LEED Silver and LID principles will guide material selection.

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						Chapter	Section	Page	Paragraph	Sentence	
27	15a		Consider contractors' commitment to the environment (such as an EMS) when choosing contractors.	DEQ, Office of Pollution Prevention	20 Coordinated Comments Letter, Dated 22-Jan-2008	4	4.4.1	4-12	5	1	Modified text to state Rivanna Station will be integrated into Fort Belvoir EMS.
28	15a		Choose sustainable materials and practices for infrastructure construction and design.	DEQ, Office of Pollution Prevention	20 Coordinated Comments Letter, Dated 22-Jan-2008	4	4.4.1	4-12	5	1 and 2	Modified text to state Rivanna Station will at a minimum meet LEED Silver and LID principles will guide material selection.
29	15a		Integrate pollution prevention techniques into the facility maintenance and operation, to include the following: inventory control (record-keeping and centralized storage for hazardous materials), product substitution (use of nontoxic cleaners), and source reduction (fixing leaks, energy-efficient HVAC and equipment).	DEQ, Office of Pollution Prevention	20 Coordinated Comments Letter, Dated 22-Jan-2008	4	4.4.1	4-12	2	7	Modified text to state Rivanna Station is integrated into Fort Belvoir Pollution Prevention Plan.
30	16		The proposal should be planned and designed to comply with state and federal guidelines and industry standards for energy conservation and efficiency. Agencies of the Commonwealth should review Executive Order 48 on energy efficiency in State government operations and take any appropriate actions that will assist in compliance.	DMME	20 Coordinated Comments Letter, Dated 22-Jan-2008						Fort Belvoir concurs and intends to follow all applicable Army regulations and local, state and Federal laws and regulations.
31	17a		The Commission supports the request of Albemarle County staff for an extension of the comment period to allow adequate review time, because copies of the Draft EA were not available locally until January 2.	PDC	20 Coordinated Comments Letter, Dated 22-Jan-2008						Extension was granted to the County.
32	17a		The Draft EA refers to the purchase of three parcels totaling 50 acres, but the Finding of No Significant Impact letter mentions a "proposed purchase of approximately 100 acres." In addition, Albemarle County staff has indicated that they cannot determine which parcels correspond to the proposed purchase. The final document should provide clarification regarding the amount of additional land to be purchased.	PDC	20 Coordinated Comments Letter, Dated 22-Jan-2008	1; 2; 4	1; 1.1; 2.1; Figure 2.3; Figure	1-1 & 1-4; 2-1-4; 2-2; 4	1-4 & 1-2; 2-1-2; 2-4	1; 2; 3 & 1; 1-2; 2	Text and figures will be modified to be more specific about individual parcels being purchased and use. Modification will include times when NEPA mitigation.
33	17a		Details are needed regarding what the type of Community Support Facility that may be developed on the additional land to be purchased.	PDC	20 Coordinated Comments Letter, Dated 22-Jan-2008	4	4.11	4-29	1	1-5	Modified text about potential Child Development Center. Removed polygons for Child Development Center from Figures.
34	17a		The PDC expressed concern about whether the expansion of the facility could really be considered a minor factor in the degradation of the intersection.	PDC	20 Coordinated Comments Letter, Dated 22-Jan-2008	4	4.2.1.1 & 4.11	4-4; 4-5; 4-30	1-2; 1-2; 2-4	1-2; 1-2; 1-3; 1-5	Modified Text
35	17a		The VDOT Long-Range Plan does not actually include widening Route 29 as far north as Rivanna Station as stated in the Draft EA. The Commissioners strongly encourage planning to minimize automobile trips to the expanded facility to the greatest extent possible.	PDC	20 Coordinated Comments Letter, Dated 22-Jan-2008	4	4.2.1.1; 4.2.1.4; 4.11	4-5; 4-5; 4-30	1-4; 5	1; 1-2; First and Second Bullet	Modified Text

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						Chapter	Section	Page	Paragraph	
36	17b	1-9	<p><b>Comment</b> The VDOT Long-Range Plan does not actually include widening Route 29 as far north as Rivanna Station as stated in the Draft EA. The Commissioners strongly encourage planning to minimize automobile trips to the expanded facility to the greatest extent possible.</p>	Albemarle County	DEQ Coordinated Comments Letter, Dated 22-Jan-2008	4	4.2.1.1; 4.2.1.4; 4.11	4-5; 4-5; 4-30	1; 4; 5 First and Second Bullet	Action Taken in EA to Address the Comment Modified Text
37	17b		<p>PDC staff noted that the project area appears to extend much further than necessary to address the security issues raised in this report.</p>	Albemarle County	DEQ Coordinated Comments Letter, Dated 22-Jan-2008	2	2.0.2.2	2-7	1-3	Modified text for clarification
38	17b		<p>Additionally, other facilities beyond what is considered in the Draft EA could alter the findings of this report with respect to community services and transportation impacts, among other issues. The final document should clarify how the proposed property acquisition is necessary to address security issues and indicate what additional facilities are envisioned for the project area.</p>	Albemarle County	DEQ Coordinated Comments Letter, Dated 22-Jan-2008	2	2.0.2.2	2-7	1-3	Modified text
39	17b	3-2	<p>The Draft EA notes a proposed development on page 3-2 (parts of Tax Map 33, Parcels 1D and 1F, Albemarle County Site Development Plan 2007-078), but does not address the overlap between the development and the project area. The final document should address how the privately owned proposed development currently under review by Albemarle County will influence or be influenced by this project.</p>	Albemarle County	DEQ Coordinated Comments Letter, Dated 22-Jan-2008	4	4.11	4-29	1	Modified text
40	17b		<p>The Draft EA does not identify specific improvements proposed by Fort Belvoir that would offset the transportation impacts from the proposed project. The project accelerates the need for offsite road improvements and contributes to the need for those improvements. Since VDOT has not allocated construction funds for the widening of Route 29 in Albemarle County, there could be significant delays on Route 29 in the vicinity of the site if these improvements are not in place when the improvements at NGIC are completed. Other projects in this area have committed to create a six lane road for 1,000 at each side of their entrances on Route 29. Recognition that similar improvements are warranted in this situation seems currently no regular transit routes that run north on Route 29 to the NGIC site.</p>	Albemarle County	DEQ Coordinated Comments Letter, Dated 22-Jan-2008	4	4.2.1.4	4-5	First & Second Bullet	Modified Text
41	17b		<p>Albemarle County fully anticipates transit service to be provided along the Route 29 corridor in the future. There are currently no regular transit routes that run north on Route 29 to the NGIC site.</p>	Albemarle County	DEQ Coordinated Comments Letter, Dated 22-Jan-2008	4	4.2.1.4	4-5	First & Second Bullet	Modified Text
42	17b		<p>The proposed project is compatible with surrounding land uses and the County's current and future land use plans for the area. Please note that the County is currently undertaking a Development Area master planning process that includes the project area - Places29.</p>	Albemarle County	DEQ Coordinated Comments Letter, Dated 22-Jan-2008	3; 4	3.1.1 & 4.1.1.1	3-1; 3-2; 4-1	2; 1-3; 4	Information on the County's Development Area Master Plan is incorporated into the document.
43	17b		<p>During the development of this site, Fort Belvoir made a strong commitment to protecting water resources by having Albemarle County approve both an Erosion and Sediment Control Plan and Stormwater Management Plan for that facility and then working with county staff to implement the approved plan. A similar level of commitment would be supported by Albemarle County.</p>	Albemarle County	DEQ Coordinated Comments Letter, Dated 22-Jan-2008					Fort Belvoir will comply with applicable Army regulations and local, state and federal laws and regulations.
44	17b		<p>The community has an interest in protecting dark skies from excessive lighting, due to the proximity of the surrounding area to two local observatories. The University of Virginia's Astronomy Department is one of the largest astronomy departments in the Southeast and is a world leader in innovation and cutting edge science.</p>	Albemarle County	DEQ Coordinated Comments Letter, Dated 22-Jan-2008	3; 4	3.1.1; 4.1.1.1; 4.13	3-4; 4-1; 4-32	1-2; 1; Ninth Bullet	Fort Belvoir concurs and modified text

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						Chapter	Section	Page	Paragraph		Sentence
45	17b		The final document should address how the 1000+ new workers and their families might impact area schools.	Albemarle County	DEQ Coordinated Comments Letter, Dated 22-Jan-2008	4	4.6.1	4-15	2-4		Modified text.
46	17b		The final document should indicate how the facility design is being coordinated with the Albemarle County Police and Fire/Rescue.	Albemarle County	DEQ Coordinated Comments Letter, Dated 22-Jan-2008	4	4.6.1	4-14	4	5	Modified text.
47	17b		Albemarle County states that they support Fort Belvoir for committing to achieve Leadership in Energy and Environmental Design (LEED) at the Silver level. Given that both Albemarle County and the City of Charlottesville have made a similar commitment with their facilities, this level of environmental leadership is appreciated.	Albemarle County	DEQ Coordinated Comments Letter, Dated 22-Jan-2008						Fort Belvoir concurs.
48	17b		The Draft EA incorrectly associates UVA's Research Park and the Northside Industrial Park with the Community of Piney Mountain. These industrial areas are in the adjacent Hollymead Community. The GE-Fanuc facility is within Piney Mountain, but not identified in the study.	Albemarle County	DEQ Coordinated Comments Letter, Dated 22-Jan-2008	3	3.1.1, 4.1.1.1	3-2, 4-1	1, 3		Modified text to reflect correction.
49			We see that best management practices from the 1982 Virginia Erosion and Sediment Control Handbook will be used to reduce soil erosion. We urge that stronger standards be applied.	Sierra Club, Piedmont Group	Sierra Club Letter, Dated 9-Jan-2008	4	4.4.1	4-12	5	2	Modified text to state Rivanna Station will at a minimum meet LEED Silver and LID principles which will provide additional protection.
50			We encourage the use of native species in landscaping as far as is feasible.	Sierra Club, Piedmont Group	Sierra Club Letter, Dated 9-Jan-2008						Fort Belvoir concurs see Section 4.13 of the EA.
51			However, the report did not examine the costs to local governments of providing public education to the children of staff members who will move to the Charlottesville/Albemarle area.	Sierra Club, Piedmont Group	Sierra Club Letter, Dated 9-Jan-2008	4	4.6.1	4-15	2-4		Modified text.
52			In addition, the expansion of intelligence work at the facility surely will elevate the attractiveness of the facility as a target of terrorist attacks. Some consideration of potential increases of risks and community consequences of attacks seem due.	Sierra Club, Piedmont Group	Sierra Club Letter, Dated 9-Jan-2008						This is outside the scope of the EA. Information can be found at Virginia Department of Emergency Management at www.vamergency.com
53			We understand that Albemarle County has requested a thirty-day extension of the public comment period. We support this request.	Sierra Club, Piedmont Group	Sierra Club Letter, Dated 9-Jan-2008						Extension was granted to the County.
54	1		The Camelot Wastewater Treatment Plant (WWTP) is currently at its limiting capacity (120,000 gallons per day). Camelot WWTP is designing a flow equalization tank for a short term solution and a regional wastewater pump station for a long-term solution.	Albemarle County Service Authority	Albemarle County Service Authority Letter, Dated 25-Jan-2008	3, 4	3.4.2, 4.4.1, 4.13	3-11, 4-11, 4-33	4, 1;	First Bullet	Modified Text.



**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

REPLY TO  
ATTENTION OF

APR 22 2008

Directorate of Public Works

Mr. John Cruickshank  
Sierra Club, Piedmont Group  
Chairman, Executive Committee  
P.O. Box 5531  
Charlottesville, Virginia 22905

Dear Mr. Cruickshank:

Thank you for providing comments on the Draft Environmental Assessment (EA) for the Expansion of Rivanna Station, Charlottesville VA. I appreciate the opportunity for improving the document and decision process made possible by staff comments. Your comments were considered and incorporated into the final documents as appropriate. Enclosed is a summary of modifications to the EA. You may view the final EA at [www.belvoir.army.mil](http://www.belvoir.army.mil).

Point of contact is Bill Sanders, Director of Public Works at 703-806-3017.

Sincerely,

  
Brian W. Lauritzen  
Colonel, US Army  
Installation Commander

Enclosure

**“EXCELLENCE THROUGH SERVICE”**



**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

REPLY TO  
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Directorate of Public Works

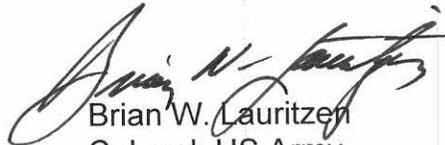
Ms. Ellie Irons  
Program Manager  
Office of Environmental Impact Review  
Virginia Department of Environmental Quality  
P.O. Box 10009  
Richmond, Virginia 23219

Dear Ms. Irons:

Thank you for providing comments on the Draft Environmental Assessment (EA) for the Expansion of Rivanna Station, Charlottesville VA. I appreciate the opportunity for improving the document and decision process made possible by staff comments. Your comments were considered and incorporated into the final documents as appropriate. Enclosed is a summary of modifications to the EA. You may view the final EA at [www.belvoir.army.mil](http://www.belvoir.army.mil).

Point of contact is Bill Sanders, Director of Public Works at 703-806-3017.

Sincerely,

  
Brian W. Lauritzen  
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REPLY TO  
ATTENTION OF

APR 22 2008

Directorate of Public Works

Ms. Tamara Ambler  
Natural Resources Manager  
Albemarle County Water and Natural  
Resources Management  
401 McIntire Road, North Wing  
Charlottesville, Virginia 22902

Dear Ms. Ambler:

Thank you for providing comments on the Draft Environmental Assessment (EA) for the Expansion of Rivanna Station, Charlottesville VA. I appreciate the opportunity for improving the document and decision process made possible by staff comments. Your comments were considered and incorporated into the final documents as appropriate. Enclosed is a summary of modifications to the EA. You may view the final EA at [www.belvoir.army.mil](http://www.belvoir.army.mil).

Point of contact is Bill Sanders, Director of Public Works at 703-806-3017.

Sincerely,

Brian W. Lauritzen  
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