



Final Environmental Assessment

For the National Foreign Affairs Training Center (NFATC)
2017 Master Plan Update



Prepared by:
The U.S. General Services Administration

April 2017



Final Environmental Assessment

National Foreign Affairs Training Center (NFATC) 2017 Master Plan Update
Arlington, VA

Responsible Agency:



U.S. General Services Administration
Public Buildings Service, National Capital Region

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Abstract

The United States (U.S.) General Services Administration (GSA), National Capital Region, has prepared this Environmental Assessment (EA) for George P. Shultz National Foreign Affairs Training Center (NFATC) 2017 Master Plan Update, located at 4000 Arlington Boulevard in Arlington County, Virginia. The NFATC site comprises approximately 72 acres of land where the State Department maintains the property as an educational and training center. The center is a major federal government education facility serving trainees in the Foreign Service. It also serves as a professional training and conference center for Department of State (DOS) staff. The proposed action calls for phased improvements to this essential facility to accommodate its evolving training mission, as well as its growing campus population (on-site and distance learners) over the next decade. Improvements include expansion of existing facilities, as well as construction of new facilities. All improvements will remain within the existing 72-acre site. Three Master Plan Alternatives and the No-Action Alternative were considered. The EA has been prepared pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended; 333

April 2017

Table of Contents

1.0	PURPOSE OF AND NEED FOR ACTION.....	1
1.1	Purpose of the Updated Master Plan	1
1.2	Objectives of the Updated Master Plan	4
1.3	Relevant Laws and Regulations	5
1.4	Environmental Issues Raised through the Scoping Process	6
1.4.1	What is NEPA and the Scoping Process?.....	6
1.4.2	What is Section 106 of the National Historic Preservation Act?	7
2.0	DESCRIPTION OF THE MASTER PLAN UPDATE AND ALTERNATIVES.....	8
2.1	No-Action Alternative	8
2.2	Build Alternatives.....	8
2.2.1	NFATC Master Plan Update Build Alternative 1 – Carried Forward.....	17
2.2.2	NFATC Master Plan Update Build Alternative 2 - Eliminated	18
2.2.3	NFATC Master Plan Update Build Alternative 3 - Eliminated	19
3.0	AFFECTED ENVIRONMENT AND SIGNIFICANCE OF EFFECTS	23
3.1	NEPA Topics Eliminated from Detailed Evaluation.....	23
3.2	Land Use and Zoning.....	30
3.2.1	Affected Environment.....	30
3.2.2	Significance of Effects	30
3.3	Resource Protection Areas	30
3.3.1	Affected Environment.....	30
3.3.2	Significance of Effects	31
3.4	Parks and Recreation	32
3.4.1	Affected Environment.....	32
3.4.2	Significance of Effects	33
3.5	NFATC Jogging/Bike Trail, Pedestrian Tunnel, and Neighborhood Connectivity	34
3.5.1	Affected Environment.....	34
3.5.2	Significance of Effects	35
3.6	Landscape and Viewshed.....	38
3.6.1	Affected Environment.....	38

3.6.2	Significance of Effects	38
3.7	Environmental Justice	40
3.7.1	Affected Environment.....	40
3.7.2	Significance of Effects	42
3.8	Perimeter Security	42
3.8.1	Affected Environment.....	42
3.8.2	Significance of Effects	42
3.9	Historic Resources.....	43
3.9.1	Affected Environment.....	43
3.9.2	Significance of Effects.....	45
3.10	Traffic Volumes and Levels of Service.....	49
3.10.1	Affected Environment.....	49
3.10.2	Significance of Effects	51
3.11	Parking	53
3.11.1	Affected Environment.....	53
3.11.2	Significance of Effects	55
3.12	Alternative Modes of Transportation	56
3.12.1	Affected Environment.....	56
3.12.2	Significance of Effects	57
3.13	Cumulative Effects	59
3.13.1	Past and Present Actions	59
3.13.2	Reasonably Foreseeable Actions	60
3.13.3	Cumulative Effects	60
4.0	REFERENCES	63
5.0	LIST OF PREPARERS	64
APPENDICES		A-1
A.	Scoping Letters and Distribution Lists.....	A-1
B.	Public Officials and Agency Coordination and Comments	B-1
C.	Section 106 Consultation	C-1
D.	NFATC Traffic Analysis	D-1
E.	View Shed and Massing Analysis	E-1

LIST OF TABLES

Table 1: NFATC Population Projections (No-Action Alternative) 4
 Table 2: NFATC Initial Improvement Concepts to Meet Program Needs 5
 Table 3: NFATC Population Projections (Build Alternative) 11
 Table 4: Comparison of NFATC Existing Condition, No-Action Alternative, and Build Alternatives 12
 Table 5: Comparison of Impacts – Full Build-Out by 2025 21
 Table 6: NFATC Jogging/Bike Trail vs. Arlington County Sidewalks – Distance and Time 36
 Table 7: Environmental Justice Populations 40
 Table 8: Archaeological Test Areas and Proposed Action 47
 Table 9: Campus Population 51
 Table 10: LOS Comparison – 2005 and 2016 NFATC Traffic Study Results 52

LIST OF FIGURES

Figure 1: Project Location 2
 Figure 2: George P. Shultz National Foreign Affairs Training Center (NFATC) 2
 Figure 3: Existing NFATC Campus, Building Function, and Building Size 3
 Figure 4: Existing and Proposed Plan from Approved 1988 NFATC EA 9
 Figure 5: Existing Condition and Approved Sites from 2005 Master Plan Update and 2005 EA/FONSI 10
 Figure 6: NFATC Existing Condition / No-Action Alternative 13
 Figure 7: NFATC Build Alternative 1 14
 Figure 8: NFATC Build Alternative 2 15
 Figure 9: NFATC Build Alternative 3 16
 Figure 10: Build Alternative 1 – Shifted Footprint of Building B 18
 Figure 11: Petroleum Releases within or near the NFATC 29
 Figure 12: Approximate RPA Impacts 31
 Figure 13: Recreation Resources and Neighborhoods 33
 Figure 14: NFATC Jogging/Bike Trail on Secure Campus (No Public Access) 36
 Figure 15: Proposed Treatment of NFATC Pedestrian Tunnel to Provide Public Access 37
 Figure 16: Additional Tree Cover as Visual Barrier 39
 Figure 17: Environmental Justice Populations by Block Group 41
 Figure 18: Perimeter Security Hardening 43
 Figure 19: Arlington Hall Station Historic District 45
 Figure 20: Sites Requiring Phase I Archaeology Survey & Areas of Prior U.S. Army Development 46
 Figure 21: Historic Structures Area of Potential Effects 48
 Figure 22: Traffic Analysis – Intersections Studied 50
 Figure 23: Current NFATC Parking 54

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1.0 PURPOSE OF AND NEED FOR ACTION

The U.S. Department of State (DOS) is updating the 1989 Master Plan for the approximately 72-acre George P. Shultz National Foreign Affairs Training Center (NFATC) located at the former Arlington Hall Station in Arlington Virginia. NFATC is the primary training facility for the Foreign Service Institute (FSI). As part of the 2017 Master Plan Update, the U.S. General Services Administration (GSA), on behalf of DOS, prepared an Environmental Assessment (EA) in compliance with the National Environmental Policy Act (NEPA) of 1969 and Section 106 of the National Historic Preservation Act (“NHPA”), [54 U.S.C. §§ 100101, et seq.], and its implementing regulations at 36 CFR Part 800. GSA is the lead federal agency for the EA.

The last update to the NFATC campus Master Plan was completed in 2005. This 2017 Master Plan Update follows the previously established vision and includes the approved buildings of the original 1989 Master Plan and the 2005 update¹. It provides updated information to meet the main goals of this 2017 Master Plan Update: construction of Building B, expansion of the Childcare Center (Building L), and perimeter security enhancements that reflect updated requirements for federal facilities.

The NFATC is located on approximately 72 acres in Arlington County, Virginia at the southeast intersection of Arlington Boulevard (Route 50) and George Mason Drive. It is approximately seven miles west of the U.S. Capitol Building and monumental core of Washington, DC (Figure 1). The NFATC is comprised of two major parcels: an approximately 65-acre main academic campus, and the approximately 7-acre West Parcel, used by FSI for satellite parking and by Memorandum of Understanding (MOU) with Arlington County as a public park. The gross square footage (GSF) of buildings on the NFATC campus now totals 623,547 GSF (Figure 2). The location, size, and function of existing buildings at the NFATC are illustrated in Figure 3. With the implementation of the Master Plan Update, the primary uses of the NFATC campus will remain unchanged.

1.1 PURPOSE OF THE UPDATED MASTER PLAN

Since the 2005 Master Plan Update, training and security requirements for DOS and FSI have changed to reflect changes in world politics, diplomacy, education, technological advances, and security requirements. FSI’s mission is to provide highly specialized training programs, varying in duration from one day to one year. Training may occur either on site, through the internet, or as a combination, referred to by FSI as blended learning. Digital video e-learning originates from studios on the NFATC campus to a worldwide audience.

Over the intervening years, training methodologies have moved away from lecture-based instruction towards more interactive and experiential methods incorporating increased use of technology. Modern, reactive training methodology requires flexible, reconfigurable spaces that are not currently available on the campus. There is a need for additional facilities to accommodate new, specialized training programs which require a combination of smaller classrooms, as well as larger classrooms and areas to support flexible class configurations. New approaches to interactive training include role plays, simulation

¹ The original, 1988 EA for the NFATC and the subsequent 2005 NFATC Master Plan Update and 2005 EA received NEPA and Section 106 approvals for buildings on sites currently identified as the locations for Buildings B, F, K, and L. See Section 2.2 for additional details.

Figure 1: Project Location

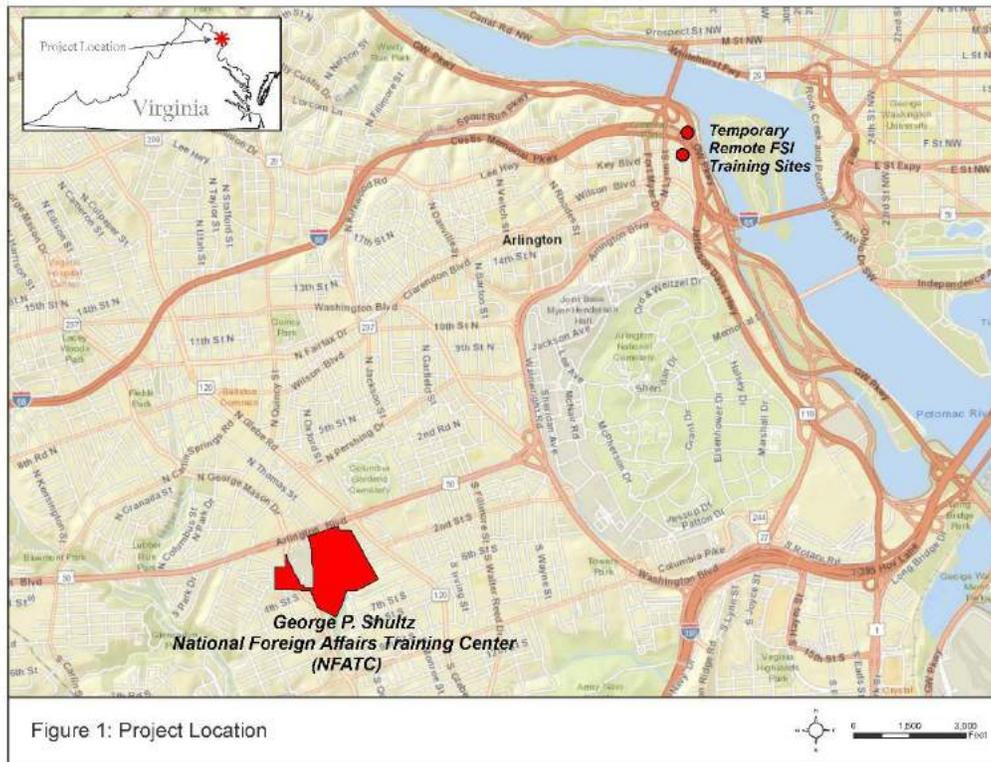
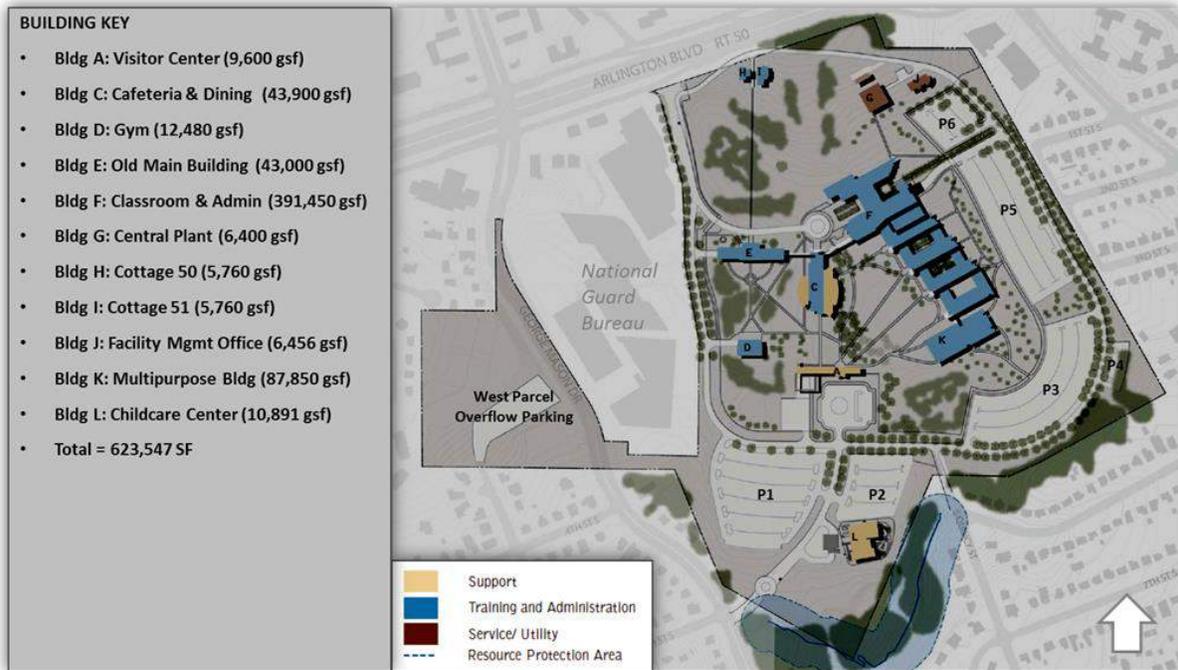


Figure 1: Project Location

Figure 2: George P. Shultz National Foreign Affairs Training Center (NFATC)



Figure 3: Existing NFATC Campus, Building Function, and Building Size



exercises, holographic interaction, and case studies integration. Expansion within the NFATC must accommodate the increased number of instructors and support personnel who will create and maintain these programs, as well as expanded e-learning and mentored distance learning programs. Worldwide terrorism and increased threats against federal enclaves and employees have resulted in enhanced federal security requirements for federal facilities. The perimeter of the NFATC campus must be made secure and done so in accordance with the standards set forth in “The Risk Management Process for Federal Facilities: An Interagency Security Committee Standard August 2013 – 1st Edition” (issued pursuant to Executive Order 12977, October 19, 1995, as amended by Executive Order 13286, March 5, 2003).

The 2017 Master Plan Update states that since 2004, substantial growth and policy requirements have increased the number of DOS employees worldwide by approximately 32%, from 55,655 to 73,268 in 2015². FSI also serves employees from other Federal agencies. This growth, along with accompanying training requirements for each DOS employee and US Government staff, has increased FSI classroom enrollment 69%, from 37,367 in 2004 to 63,093 in 2015 with a combined classroom and distance learning enrollment increase of 361%, from 39,017 to 179,949.³ The 2017 Master Plan Update is based on the past, present, and future NFATC campus population data presented in Table 1. Population projections were provided by DOS and FSI staff. Key assumptions for the 2020 and 2025 population projections are provided in the bulleted text that follows Table 1.

² Department of State and General Services Administration. *National Foreign Affairs Training Center: 2017 Master Plan Update*. NCP Submission – January 13, 2017. Page 14.

³ Ibid.

Table 1: NFATC Population Projections (No-Action Alternative)

Population Group	2005 NFATC Master Plan Update Data	2005 NFATC EA Data	2017 NFATC Master Plan Update Data	2020 NFATC Master Plan Update Data		2025 NFATC Master Plan Update Data	
				On-Campus	Off-Campus	On-Campus	Off-Campus
Faculty / Staff	845	920	1,400	1,170	200	1,400	200
Students	1,642	1,348	1,818	1,652	250	2,409	250
Total Planning Population	2,487	2,268	3,218	2,822	450	3,359	450

Source: U.S. Department of State and Foreign Services Institute November 8, 2016.

- One off-campus training location at 1200 Wilson Boulevard, in Rosslyn, VA (DOS-acquired commercial office space) will be required to accommodate overflow students and staff from NFATC.
- The daily off-campus population will remain static at 450 individuals into 2025.
- There will be a continued 3% growth in daily campus student population through 2025 and an increase in FSI personnel of 30 individuals by 2018.
- FSI full-time and contract staff are part of Daily On-Campus population.

An updated Master Plan is necessary to plan sufficient training and support space for present and anticipated methods of instruction, increased training hours, and new program requirements.

1.2 OBJECTIVES OF THE UPDATED MASTER PLAN

The major objectives of the 2017 Master Plan Update are to:

- Advance projects previously identified and approved in the 1989 Master Plan and the 2005 NFATC Master Plan Update to support current FSI programs;
- Enhance security to reflect current threat assessment levels;
- Provide associated infrastructure projects needed to support new security and training requirements;
- Meet established historic preservation requirements for identified historic buildings and districts, as well as cultural landscape elements on the NFATC campus; and
- Comply with all governmental requirements, including those for energy, health and wellness, accessibility, and the environment.

The 2017 Master Plan Update proposes specific physical changes to the campus including:

- Supplementing existing training facilities to provide additional efficient and flexible training space for DOS and other government employees;
- Accommodating the planned 2020 consolidation of off-site FSI classroom training facilities from other National Capital Region locations;

- Providing adequate childcare facilities, student study spaces, collaboration spaces, information resources, and food service to improve FSI support services;
- Enhancing security protection, including eliminating the jogging/bike trail⁴ traversing the southern portion of the campus and installing new security elements such as guard booths, barriers, low walls, fencing, and screening; and
- Providing stormwater management improvements to accompany the proposed development on campus.

DOS and FSI developed the improvement concepts identified in Table 2 to meet space requirements and objectives. Improvement concepts were then vetted through the Master Plan Update process and developed into Build Alternatives (see Chapter 2). Initially, up to 328,800 gross square feet (GSF) of additional building space were identified as necessary to meet current and future campus training needs.

Table 2: NFATC Initial Improvement Concepts to Meet Program Needs

Improvement Concept	Improvement Purpose	Improvement Description
New - Building B	New training and classroom facilities	Approximately 200,000 GSF
Expansion – Building L	Expand Childcare Center	Approximately 10,000 GSF
Expansion – Building F	Expand office and classroom space	Approximately 75,000 GSF
Expansion – Building K	Expand multi-purpose auditorium space via horizontal expansion	Approximately 12,000 GSF
Expansion – Building K	Expand multi-purpose auditorium space via vertical expansion	Approximately 25,000 GSF
Expansion – Visitor Center	Expand Visitor Center for more efficient visitor processing	Approximately 6,800 GSF
New & Upgraded – Physical Security	Enhance physical security to meet facility requirements	New perimeter fencing, upgraded guard booths, new bollards, new signage
<i>Additional Building Square Footage</i>		<i>Approximately 328,800 GSF</i>

1.3 RELEVANT LAWS AND REGULATIONS

This EA was prepared in accordance with the following laws and regulations:

- Section 102(2) of the National Environmental Policy Act of 1969 (NEPA), as amended
- 22 CFR Part 161-Regulations for Implementation of NEPA

⁴ Public access to and use of the jogging/bike trail on both the East and West Parcels of the NFATC are stipulated in the 7/30/08 amended Memorandum of Understanding (MOU) between the DOS and Arlington County. There are no easements providing for public use of the jogging/bike trail.

- The Council of Environmental Quality implementing regulations under 40 CFR Parts 1500 to 1508.
- National Historic Preservation Act of 1966 (NHPA)
- Section 106 of the NHPA and its implementing regulations (36 CFR Part 800-Protection of Historic Properties)
- Environmental Quality Improvement Act of 1970, as amended, (42 U.S.C. 4371 et seq.).
- Executive Order 11514, Protection and Enhancement of Environmental Quality, as amended
- Executive Order 13508, Chesapeake Bay Protection and Restoration
- Executive Order 12898 Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations
- Executive Order 13045, Protection of Children from Environmental Health Risks and Safety Risks
- EO 13175, Consultation and Coordination with Indian Tribal Governments
- EO 13693 Planning for Federal Sustainability in the Next Decade
- Other applicable statutes, judicial decisions, Federal policies, regulations, and guidelines.

1.4 ENVIRONMENTAL ISSUES RAISED THROUGH THE SCOPING PROCESS

1.4.1 What is NEPA and the Scoping Process?

NEPA is the nation's legislative charter for protection of the environment. NEPA requires federal agencies to consider environmental impacts of their projects during federal agency planning and decision-making. NEPA requires federal agencies to prepare an EA if the significance of the impacts that may result from the Proposed Action is unknown. GSA's EAs and other NEPA documents are prepared in accordance with the Council on Environmental Quality (CEQ) regulations for implementing NEPA (40 Code of Federal Regulations (CFR) 1500-1508), GSA Order ADM 1095.1F-Environmental Considerations in Decision-Making, and the Public Building Service (PBS) NEPA Desk Guide (October 1999). Public involvement is an important part of the NEPA process. Title 40 Code of Federal Regulations (CFR) Part 1500.1(b) states, "NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken." By involving citizens, stakeholder groups, and local, state, and federal agencies, the Federal Government can make better informed decisions.

Through the NEPA process, the public has had and will continue to have opportunities to comment on the 2017 Master Plan Update. GSA initiated the public involvement processes through the distribution of scoping letters to Federal, State, local agencies, elected officials, and other interested parties. "Scoping" is a tool for identifying the issues that should be addressed in the EA and processes required under Section 106 process of the National Historic Preservation Act (NHPA). Scoping allows the public to help define priorities and express stakeholder and community issues to the agency through written comments and the one-on-one exchange of information with Project Team members. GSA distributed scoping letters inviting Federal, state, and local agencies and officials to provide comments and express concerns about the 2017 Master Plan Update. In addition, GSA hosted a Public Scoping Meeting on July 19, 2016. The public was invited to attend the meeting through mailed postcard invitations, public

notices in local and national newspapers, and a public meeting announcement on GSA's project website (<http://www.gsa.gov/portal/content/136234>). The public scoping period was open from July 19, 2016 through August 19, 2016.

Approximately 17 individuals attended the Public Scoping Meeting and a total of eight written comments were provided by the general public. Of the 43 agencies and officials receiving scoping letters, five provided responses: the Advisory Council on Historic Preservation (ACHP), the Virginia Department of Historic Resources (VDHR) (also referred to as the State Historic Preservation Office or SHPO), the Washington Metropolitan Area Transit Authority (WMATA), the National Capital Planning Commission (NCPC), and Arlington County. Of the four Tribal Nations contacted, one provided a response. Scoping letters received can be found in Appendices A, B, and C.

Comments received during the scoping period were taken into consideration during the development of the EA. The key issues identified during scoping included:

- Transportation - impacts to traffic, off-site parking, bicycle and pedestrian connectivity between adjacent communities with campus access restrictions, and future demands on mass transit services;
- Historic Resources – project effects to the Arlington Hall Station Historic District and adjacent Barcroft and Alcova Heights historic resources, Tribal consultation, and compliance with Section 106;
- Adjacent Communities – views of new buildings, campus lighting, adequate on-campus parking to eliminate on-street parking in adjacent neighborhoods, the need for additional vehicular access points on campus to eliminate long lines of cars waiting to get past the security gates.

1.4.2 What is Section 106 of the National Historic Preservation Act?

The NHPA of 1966 governs Federal agencies in their handling of historic properties. As with NEPA, Section 106 of the NHPA requires that federal agencies take into account the adverse effects of their actions (undertaking) on historic resources. Under the NHPA, historic resources are defined as any district, site, building, structure, or object listed in or eligible for listing in the National Register of Historic Places (NRHP). Section 106, and its implementing regulations 36 CFR Part 800, encourages avoidance and minimization of adverse effects to historic resources. When these cannot be avoided, mitigation measures must be developed. The lead agency is required to consult with local and state agencies, as well as other consulting parties with interest in the undertaking. GSA has initiated consultations with the Virginia Department of Historic Resources (VDHR) for this project, as well as invited consulting parties and Tribal Nations to participate.

The public had the opportunity to comment on historic preservation issues during the public review period of the draft version of this EA. The public review period of the draft EA was open from December 15, 2016 through January 13, 2017.

2.0 DESCRIPTION OF THE MASTER PLAN UPDATE AND ALTERNATIVES

This EA evaluates a No-Action Alternative and a Build Alternative (implementation of improvements proposed in the 2017 Master Plan Update). The No-Action Alternative is required by CEQ regulations and is intended to serve as a baseline for the assessment of impacts. The Build Alternative represents concepts developed to address FSI's current and future training program requirements in light of the Master Plan objectives for the NFATC.

2.1 NO-ACTION ALTERNATIVE

NEPA requires Federal agencies to consider a No-Action Alternative as part of their impact analysis. Evaluating the No-Action Alternative provides a baseline for comparing the environmental impacts of the Build Alternative. Under the No-Action Alternative, the improvements proposed under the Build Alternative would not occur. No new facilities would be constructed and existing buildings would not be expanded. Because the No-Action Alternative does not include campus improvements, its features are the same as the Existing Condition. Implementation of the No-Action Alternative would not provide DOS and FSI with sufficient training and support space for present and anticipated methods of instruction, increased student population, increased training hours, and new program security requirements. The 2020 consolidation of off-site FSI classroom training onto the NFATC campus would not occur. Off-campus training at the DOS-acquired space in Rosslyn, Virginia would continue providing required training to support 450 students and faculty.

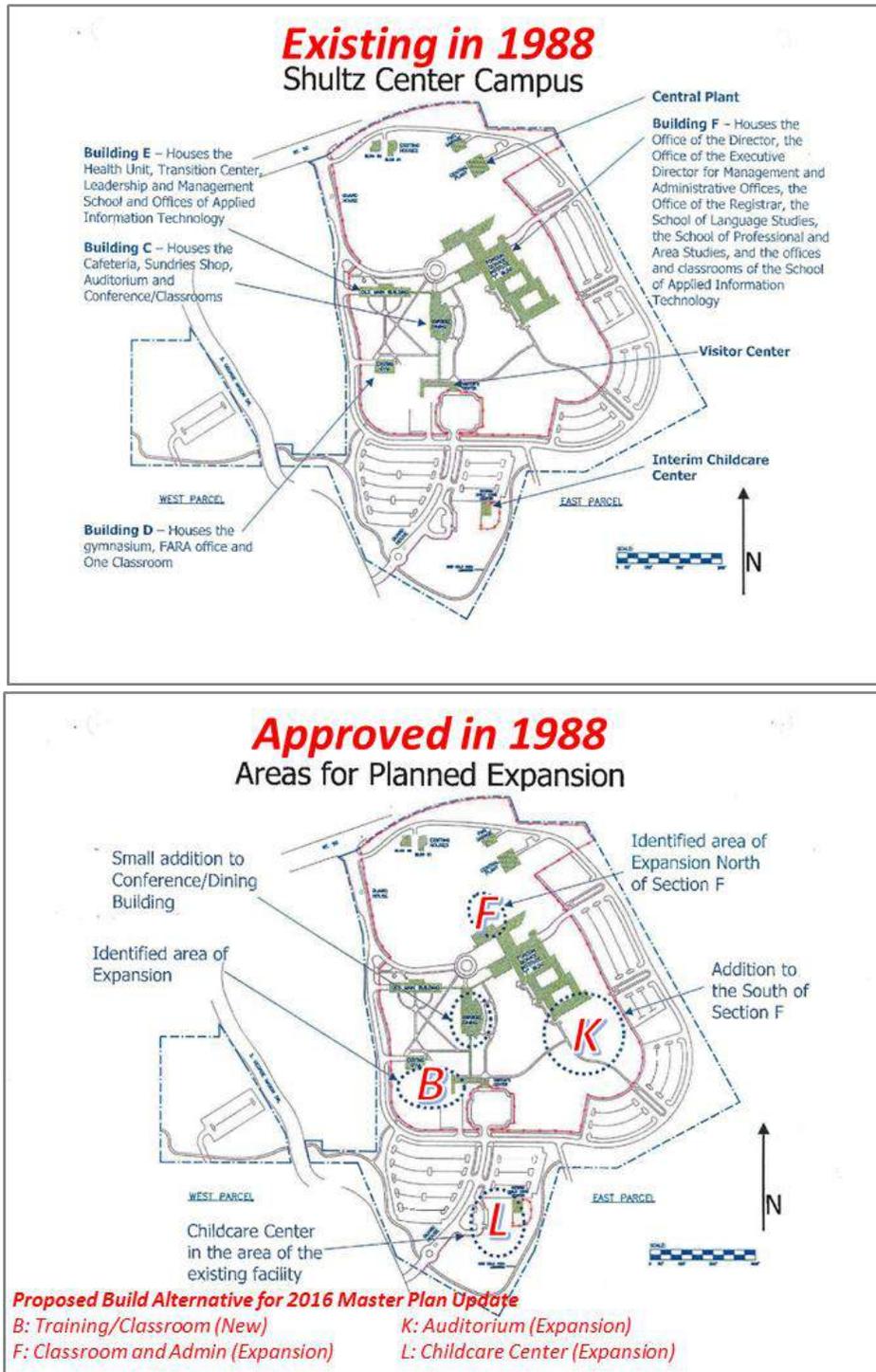
2.2 BUILD ALTERNATIVES

To achieve project objectives and address current and future NFATC campus needs, construction of a new building and the expansion of several existing buildings would be required, as would physical security enhancements and infrastructure improvements. No campus expansion is proposed under the Build Alternative; all improvements would occur within the existing property boundary, including new and/or additional perimeter fencing. Consolidation of FSI training programs on campus would eliminate some duplicate support requirements, enhance the student experience by providing access to their peers who are also going abroad, and provide access to the FSI immunization and family support resources. There are no other training facilities other than the space in Rosslyn, VA that would be consolidated onto the NFATC campus. No changes to the West Parcel are under consideration as part of the 2017 Master Plan Update.

The previously approved Build Alternative from the original 1988 EA, as well as the subsequent 2005 NFATC Master Plan Update and the 2005 EA/FONSI, is identified in Figures 4 and 5, respectively. As shown in Figure 4, sites for campus expansion were identified and approved in the original 1988 EA. These sites are currently identified as the locations for Buildings B, F, K, and L. Construction and expansion of these buildings were to be phased based on campus need and funding availability. When the NFATC Master Plan Update and the corresponding EA/FONSI were updated in 2005, existing and projected campus needs called for the immediate expansion of Buildings K and L, and the retention of sites for Buildings B and F for future implementation (Figure 5). Given funding constraints, only a portion of the Building K expansion and none of the Building L expansion were completed. The 2017 NFATC Master Plan Update reevaluates existing and future needs of the NFATC. Based on existing and anticipated demand, the expansion of Buildings K and L continue to be needed, as do the construction of

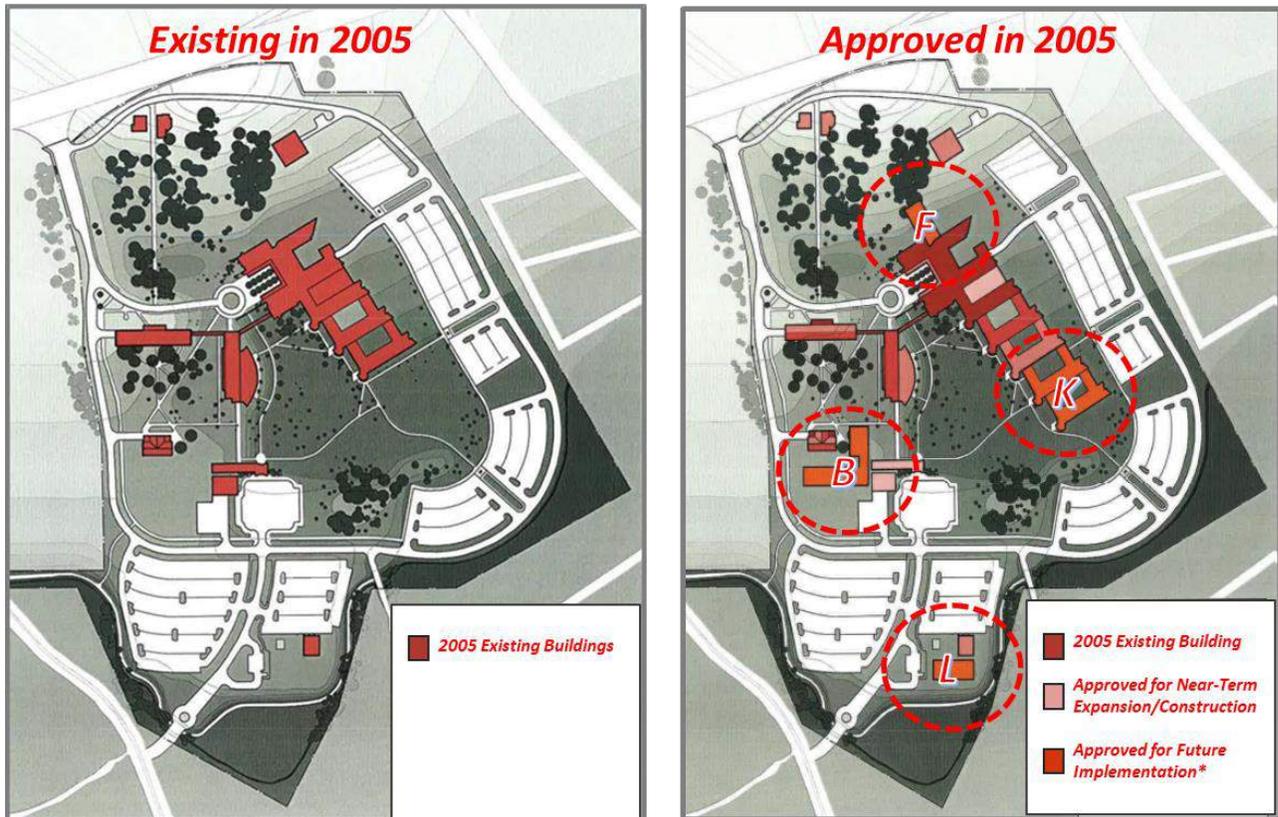
Buildings B and F which were part of the approved Build Alternative presented in the original 1988 EA, the 2005 Master Plan Update, and the 2005 EA/FONSI.

Figure 4: Existing and Proposed Plan from Approved 1988 NFATC EA



Source: Government Services Administration. *National Foreign Affairs Training Center – Environmental Assessment, Arlington Hall*. September 9, 1988.

Figure 5: Existing Condition and Approved Sites from 2005 Master Plan Update and 2005 EA/FONSI



*Sites for Building B, F, K, and L were originally approved for future implementation in 1988 then approved again in 2005.

Sources:

U.S. Department of State. *The George P. Shultz National Foreign Affairs Training Center – NCPC Evaluation of the Master Plan Update*. May 28, 2004.

U.S. Department of State. *Final Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) for the George P. Shultz National Foreign Affairs Training Center*. March 2005.

For this EA, the need for additional facilities and services at NFATC are projected to year 2025 based on FSI’s projected student, faculty, and staff populations. Given the evolving nature and unpredictable nature of global politics, accurate NFATC population projections beyond 2025 are difficult at best. Future Master Plan Updates will address long-range issues that extend beyond the 2025 horizon.

Three Master Plan Build Alternatives were developed in light of the objectives identified in Chapter 1:

- Build Alternative 1,
- Build Alternative 2, and
- Build Alternative 3.

Population projections for students, faculty, and staff are the same, regardless of the Build Alternative. These population projections helped guide the sizing of new and existing facilities to best meet training needs (Table 3.). The only difference in daily, on-campus population projections between the No-Action Alternative and the Build Alternatives would be 450 individuals. Under the No-Action Alternative, 450

individuals would continue to be located at the DOS-acquired space for temporary off-campus training space in Rosslyn, Virginia. Under the Build Alternatives, training would be consolidated and there would be sufficient facilities available for those 450 individuals to be on campus.

Table 3: NFATC Population Projections (Build Alternative)

Year	Daily On-Campus Population	Daily Off-Campus Population*	Distinct Annual Student Count	Annual FSI Personnel	ANNUAL TOTAL
FY 2004	2,487	0	37,367	845	38,212
FY2015	3,165	0	36,687	1,400	38,087
FY2020	3,028	450	42,529	1,400	43,929
FY2025	3,809	0	50,782	1,400	52,182

Development of the Build Alternatives included avoiding and/or minimizing potential impacts to the human and natural environment. Regional and local contexts for the NFATC and characteristics of the campus, including existing buildings, land use, circulation, parking, infrastructure, historic features, and natural features, were considered in the development of Build Alternatives for the Master Plan Update.

Differences among the three Build Alternatives are best illustrated by the square footage comparison in Table 4. Figures 6 through 9 illustrate the proposed footprint of the existing/No Action Alternative relative to the improvements associated with each of the three Build Alternatives.

The goal of consolidating off-site FSI classroom training facilities from other National Capital Region locations by 2020 would be met under any of the Build Alternatives. New and expanded training facilities at NFATC would be able to accommodate 450 students and faculty currently receiving/providing training off campus.

The order in which improvements are undertaken would depend on funding availability and the periodic assessment of DOS/FSI's mission-critical needs. Several projects are currently identified by DOS and FSI for early, high-priority implementation:

- Building B - a new training/classroom building,
- Building L - Childcare Center Facility expansion,
- Physical Security Enhancements – upgraded perimeter fencing and guard booths, and
- Infrastructure Improvements.

The campus would remain in operation during construction of any of the proposed improvements. In addition, all perimeter fencing improvements will be located within the existing property boundary of the NFATC. No VDOT right-of-way will be required for fencing improvements and no sidewalk improvements to the sidewalk along Arlington Boulevard and adjacent to the NFATC campus are proposed.

Table 4: Comparison of NFATC Existing Condition, No-Action Alternative, and Build Alternatives

Building ID	Existing Building Name	Existing Condition / No-Action Alternative	Build Alternative 1	Build Alternative 2	Build Alternative 3
		<i>gsf</i>	<i>gsf</i>	<i>gsf</i>	<i>gsf</i>
A	Visitor Center	9,600	9,600	9,600	-
C	Cafeteria & Dining	43,900	43,900	43,900	43,900
D	Gym	12,480	12,480	12,480	12,480
E	Old Main Building	43,000	43,000	43,000	43,000
F	Classroom & Administration	391,450	391,450	391,450	391,450
G	Central Plant	6,400	6,400	6,400	6,400
H	Cottage 50	5,760	5,760	5,760	5,760
I	Cottage 51	5,760	5,760	5,760	5,760
J	Facility Management Office	6,456	6,456	6,456	6,456
K	Multipurpose Building	87,850	87,850	87,850	87,850
L	Childcare Center	10,891	10,891	10,891	10,891
Subtotal of Existing Building Square Footage		623,547	623,547	623,547	613,947
Building ID	Proposed New or Expansion Building Name	Existing Condition / No-Action Alternative	Build Alternative 1	Build Alternative 2	Build Alternative 3
		<i>gsf</i>	<i>gsf</i>	<i>gsf</i>	<i>gsf</i>
A	New - Visitor Center	-	-	-	6,010
A	Expansion - Visitor Center	-	6,800	5,078	-
B	New - Building B	-	200,232	200,232	200,232
F	North Expansion - Classroom & Administration	-	75,000	75,284	-
G	Expansion - Central Plant	-	6,165	6,165	-
K	Expansion - Auditorium	-	12,000	13,013	-
K	Vertical Expansion - Auditorium	-	-	25,452	-
K	New - Building K	-	-	-	113,201
L	Expansion - Childcare Center	-	10,000	10,000	10,000
Subtotal of Proposed Building GrossSquare Footage		0	310,197	335,224	329,443
Total Existing and New/Expansion Square Footage		623,547	933,744	958,771	943,390

Figure 6
NFATC Master Plan
**Existing Condition/
 No-Action Alternative**



- NFATC Boundary
- Arlington Hall Station Historic District
- Existing Fencing
- Jogging/Bike Trail
- Existing Stormwater Pond
- Resource Protection Area (RPA)

Existing Buildings

- A: Visitor Center
- C: Cafeteria & Dining
- D: Gym
- E: Old Main Building
- F: Classroom & Admin
- G: Central Plant
- H: Cottage 50
- I: Cottage 51
- J: Facility Management Office
- K: Multipurpose Building
- L: Childcare Center



Figure 7
NFATC Master Plan
Build Alternative 1



- NFATC Boundary
- Arlington Hall Station Historic District
- Build Alternative 1
- Phase I Archaeology Survey Required
- Proposed Perimeter Fencing
- Existing Fencing
- Jogging/Bike Trail
- Existing Stormwater Pond
- Resource Protection Area (RPA)

Existing Buildings

- A: Visitor Center
- C: Cafeteria & Dining
- D: Gym
- E: Old Main Building
- F: Classroom & Admin
- G: Central Plant
- H: Cottage 50
- I: Cottage 51
- J: Facility Management Office
- K: Multipurpose Building
- L: Childcare Center

Proposed Buildings

- A: Visitor Center (Expansion)
- B: Training/Classroom (New)
- F: Classroom and Admin (Expansion)
- G: Central Plant (Expansion)
- K: Auditorium (Expansion)
- L: Childcare Center (Expansion)



Figure 8
NFATC Master Plan
Build Alternative 2



- NFATC Boundary
- Arlington Hall Station Historic District
- Build Alternative 2
- Phase I Archaeology Survey Required
- Proposed Perimeter Fencing
- Existing Fencing
- Jogging/Bike Trail
- Existing Stormwater Pond
- Resource Protection Area (RPA)

Existing Buildings

- A: Visitor Center
- C: Cafeteria & Dining
- D: Gym
- E: Old Main Building
- F: Classroom & Admin
- G: Central Plant
- H: Cottage 50
- I: Cottage 51
- J: Facility Management Office
- K: Multipurpose Building
- L: Childcare Center

Proposed Buildings

- A: Visitor Center (Expansion)
- B: Training/Classroom (New)
- F: Classroom and Admin (Expansion)
- G: Central Plant (Expansion)
- K: Auditorium (Expansion)
- L: Childcare Center (Expansion)



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Figure 9
NFATC Master Plan
Build Alternative 3



- NFATC Boundary
- Arlington Hall Station Historic District
- Build Alternative 3
- Phase I Archaeology Survey Required
- Proposed Perimeter Fencing
- Existing Fencing
- Jogging/Bike Trail
- Existing Stormwater Pond
- Resource Protection Area (RPA)

Existing Buildings

- A: Visitor Center
- C: Cafeteria & Dining
- D: Gym
- E: Old Main Building
- F: Classroom & Admin
- G: Central Plant
- H: Cottage 50
- I: Cottage 51
- J: Facility Management Office
- K: Multipurpose Building
- L: Childcare Center

Proposed Buildings

- A: Visitor Center (Expansion)
- B: Training/Classroom (New)
- F: Classroom and Admin (Expansion)
- G: Central Plant (Expansion)
- K: Auditorium (Expansion)
- L: Childcare Center (Expansion)



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2.2.1 NFATC Master Plan Update Build Alternative 1 - Carried Forward

Alternative 1 retains the existing buildings on campus, generally continuing their current use. It is consistent with the original 1989 Master Plan and the subsequent 2005 Master Plan Update. Build Alternative 1 would provide an additional 310,197± GSF of new and expanded facilities. This represents a 50% increase in square footage over the No-Action Alternative. Expanded or new construction would occur incrementally, as needed and as funding is available. Additions under Build Alternative 1 would be as follows:

- A new Visitor Center south of the existing Visitor Center. The existing Visitor Center would be repurposed as a student center.
- A new training wing addition north of Building F.
- An addition to the Chiller Plant (Building G), as needed, to supplement the campus expansion.
- An addition to Building K to the west for an auditorium.
- A new training building (Building B) located south of the existing Gym.
- An addition to the Childcare Center (Building L) on the southern side of the existing facility.
- Closure of public access to the existing jogging/bike trail to comply with enhanced security requirements.

Build Alternative 1 incorporates previously identified smaller construction projects from earlier Master Plans and provides flexibility to accommodate growth as needed. In addition to the new and expanded buildings presented in Table 4 and Figure 7, improvements under Build Alternative 1 include physical security enhancements with new perimeter fencing, upgraded guard booths, bollards, and signage. Alternative 1 meets the objectives identified in Chapter 1 and best meets the Planning Principles identified in the 2017 Master Plan Update. Build Alternative 1 is considered a viable alternative and is carried forward for detailed analysis and consideration in this EA.

Following the review of the Draft EA, additional measures were developed for Building B to minimize the potential for adverse effects to the Arlington Hall Station Historic District, a property eligible for listing on the National Register of Historic Places (NRHP). As shown in Figure 10, the footprint of Building B was shifted to the south, farther away from the old gymnasium (Building D). While the configuration of Building B changed, the gross square footage remains the same. Build Alternative 1 now includes the revised footprint location of Building B.

Figure 10: Build Alternative 1 - Shifted Footprint of Building B



2.2.2 NFATC Master Plan Update Build Alternative 2 - Eliminated

Build Alternative 2 also retains the existing buildings on campus, generally continuing their current use (Figure 8). Alternative 2 would provide an additional 335,224± GSF of new and expanded facilities. This represents a 54% increase in square footage over the No-Action Alternative. Additions under Build Alternative 2 would be as follows:

- Alternative 2 calls for an addition to the east of the existing Visitor Center building. This alternative would retain the circular drop-off and limited visitor parking south of the Visitor Center.
- A new training wing addition to the north side of Building F.
- Two additions to Building K - an auditorium addition to the west and an additional training floor above the existing Building K.
- A new training building (Building B) located south of the Gym; and
- An addition to the north of the existing Childcare Center.
- Enhanced security requirements, including new guard booths, bollards, and other vehicle barriers, as well as new or modified perimeter fencing.
- Closure of public access to the existing jogging/bike trail to comply with enhanced security requirements.

Build Alternative 2 consolidates the bulk of FSI’s programmatic requirements into a compact massing of buildings located on or near the southern parcels of the campus. However, Build Alternative 2 would not address or meet the project purpose and need for the following reasons:

- The proposed pedestrian circulation within the academic heart of the NFATC campus does not meet FSI programmatic requirements.
- With new security requirements, an addition to the Visitor Center would not adequately solve the problems of screening visitors in an efficient and timely manner. A new building would better meet the current security requirements.
- The addition to the Childcare Center, located to the north of the existing building, would be more costly. A substantial number of utility mains located in the parking lot would require

relocation, including the main electric feed, as well as telecommunication lines and storm drain lines. The addition would also eliminate approximately 91 parking spaces in Lot P2.

- The addition to the Childcare Center does not meet the perimeter security setback requirements; cost-prohibitive security enhancements would be needed to maintain the perimeter security requirements.
- A portion of the Childcare Center addition encroaches on the resource protection area (RPA) along Doctors Run.
- The expansion of Building K, which adds an upper floor to the existing building, would be too disruptive to the campus and would require significant construction challenges to protect the safety of staff and existing, nearby buildings.

For these reasons, Build Alternative 2 is eliminated from further consideration in the EA.

2.2.3 NFATC Master Plan Update Build Alternative 3 - Eliminated

Build Alternative 3 retains the existing buildings on campus, generally continuing their current use (Figure 9). Alternative 3 would provide an additional 329,443± GSF of new space. This represents a 51% increase in square footage over the No-Action Alternative. Additions under Build Alternative 3 would be as follows:

- Build Alternative 3 calls for a new Visitor Center building located southeast of the existing Visitor Center and southwest of Building K.
- The existing Visitor Center would be repurposed as a student study center.
- A new training building (Building K) would be constructed southwest of existing Building K.
- A new training building (Building B) would be constructed south of the Gym.
- An addition to the Childcare Center would be added to the east.
- Enhanced security requirements, including new guard booths, bollards, and other vehicle barriers, as well as new or modified perimeter fencing.
- Closure of public access to the existing jogging/bike trail to comply with enhanced security requirements.

Build Alternative 3 would consolidate the bulk of FSI's programmatic requirements into a compact massing of buildings located to the south and west of the existing Visitor Center. It would reconfigure the entry sequence at the George Mason gate and the roads in the southern portion of the main campus. However, Build Alternative 3 would not address or meet the project purpose and need for the following reasons:

- The addition to the Childcare Center does not meet the perimeter security setback requirements of a minimum of 15 feet; cost-prohibitive security enhancements would be needed to maintain the perimeter security requirements.
- A portion of the Childcare Center addition encroaches on the resource protection area (RPA) along Doctors Run.
- The locations of the new Visitor Center and new K Building in Build Alternative 3 would not meet FSI program adjacency requirements.
- Building K would be within the Visitor Center Test Area, an area with the potential to yield archaeological resources and an area requiring a Phase 1 archaeology survey prior to ground-disturbing activity.

- Build Alternative 3 would not include a Central Plant expansion, potentially impacting the infrastructure improvements identified as needed in the project's Purpose and Need statement.
- The reconfiguration of the road on the south requires more site improvements, which would be disruptive to entering and exiting of the campus. In addition, the reconfiguration would eliminate approximately 47 parking spaces from parking lot P2

For these reasons, Build Alternative 3 is eliminated from further consideration in the EA.

Table 5 provides a comparison of facility size and potential impacts associated with the No-Action Alternative and the three Build Alternatives.

Table 5: Comparison of Impacts - Full Build-Out by 2025

Resource	No-Action Alternative	Build Alternative 1	Build Alternative 2	Build Alternative 3
Square Feet Building Space	623,547 Total GSF <i>0 additional GSF</i>	933,744± Total GSF <i>310,197± additional GSF</i>	958,771± Total GSF <i>335,224± additional GSF</i>	943,390± Total GSF <i>329,443± additional GSF</i>
Year 2025 Daily, On-Campus Population	3,359 Total Daily On-Campus Population. Approximately 450 students, faculty, and staff would remain off-campus due to space constraints on-campus.	3,809 Total Daily On-Campus Population There would be no difference among the Build Alternatives relative to future, on-campus, daily population projections.		
Traffic	By 2025, main intersections will continue to operate at similar levels of service (LOS C or better) with slightly higher delays. Exception to this is George Mason / 6 th street intersection (LOS F).	Traffic volumes and impacts would be similar to No-Action Alternative. The additional 450 student/staff populations would create a slight increase in traffic on the roadways and intersections surrounding the Shultz Center. George Mason / 6th street intersection would operate at a slightly worse LOS F than it does under the No-Action Alternative.		
Parking – # of Spaces	1,690	1,690	1,599	1,643
Mass Transit	Public transportation would experience increased use from the expansion of NFATC that might necessitate additional buses or transit, or increased frequency of service. The updated Transportation Management Plan (TMP) remains consistent with the 2005 TMP by way of encouraging the use of active transportation (biking, walking), public transit, DOS and private shuttle services, and ridesharing to reduce the use of single occupant vehicles and the need for parking on campus.			
Pedestrian/Bicycle Circulation	For security reasons, the NFATC will become a closed campus. The existing jogging/bike trail near the Childcare Center will be removed and the remaining trails within the campus will be accessible only to DOS-badged personnel. Neighborhood connectivity via NFATC will not be possible and will require a slightly longer bicycle ride or walk around the campus to get to and from desired destinations. Pedestrian tunnel access from the sidewalks adjacent to George Mason Drive are currently blocked by NFATC perimeter fencing. With the proposed upgrades in perimeter fencing, the fencing will be reconfigured to allow public access to the pedestrian tunnel on the east side of George Mason Drive. This would occur regardless of the alternative.			
Historic Resources	The No-Action Alternative will have no adverse effect on the historic resources on this site.	GSA and DOS have consulted with the Virginia Department of Historic Resources (DHR), also referred to as the State Historic Preservation Office (SHPO), and determined that the new building program and perimeter security fence have the potential to have an adverse effect on the Arlington Hall Historic District. GSA and DOS have also deferred further archaeological investigations until construction. GSA, DOS, SHPO, and the Advisory Council on Historic Preservation (ACHP) will have a signed Programmatic Agreement (PA) in place prior to the approval of the Master Plan by the National Capital Planning Commission (NCPC) and will consult on design submissions and archaeology investigations to address potential adverse effects that may result.		
Viewsheds	The No-Action Alternative will have no effect on the viewsheds of and from the NFATC.	Portions of new and expanded buildings may be visible from within and outside of campus, depending on the viewer’s location. Additional tree plantings will be added around the buildings and the perimeter of the campus to screen interior views of the site from adjacent residences.		
Ambient Air Quality	No significant change in air quality is anticipated in local or regional air quality due to the No-Action or Build Alternative.			
Ambient Noise	No significant change in ambient noise level is anticipated due to the No-Action or Build Alternatives.			
Socioeconomics	Neither the No-Action nor any of the Build Alternatives will impact social or economic character, employment, commerce, or housing in the surrounding area or on campus. On-campus populations are anticipated to consistently grow at a 3% rate per year, regardless of alternative.			

Resource	No-Action Alternative	Build Alternative 1	Build Alternative 2	Build Alternative 3
Environmental Justice	The No-Action and the Build Alternatives are contained within the existing boundaries of a secured installation. While minority and low-income populations are present within the Buckingham block group (to the north of the NFATC and separated by Arlington Boulevard), none of the alternatives would result in a disproportionately high and adverse impact on environmental justice populations. NFATC’s operations do not currently impact the adjacent populations’ abilities to get access or receive goods and services, or pose an impact on community functions.			
Soils	There would be no ground disturbing activities; therefore there would be no impact to soils.	There would be small, short-term and long-term disturbances to the existing topography under any of the Build Alternatives due to building construction. Soil borings may be taken as needed to determine soil characteristics for use in building design and landscaping. The borings would temporarily disturb a small area. Structural fill may be required for the construction of new and/or expanded buildings. All appropriate local and state erosion and sediment control measures will be adhered to during construction activities. After construction is completed, disturbed soils will be landscaped with appropriate vegetative species to enhance the campus setting		
Surface Water & Wetlands	There would be no ground disturbing activity; therefore, surface water and wetlands would not be disturbed.	No direct impacts to surface waters or wetlands are anticipated. Approximately 1,444 linear feet (lf) of new fencing would be constructed within the RPA and a combined total of approximately 723 lf of fencing and jogging/bike trail would be removed from the RPA. Impacts to the RPA, as well as short-term impacts, would be minimized as much as possible by implementing BMPs during construction.	No direct impacts to surface waters, wetlands. Expansion of Childcare Center (Bldg. L) would encroach on approximately 480 ft ² of the RPA around Doctors Run Branch. In addition, approximately 1,444 lf of new fencing would be constructed within the RPA. Potential short-term, indirect adverse impacts to surface waters during construction would be minimized through use of BMPs.	No direct impacts to surface waters, wetlands. Expansion of Childcare Center (Bldg. L) would encroach on approximately 5,066 ft ² of the RPA around Doctors Run Branch. In addition, approximately 1,444 lf of new fencing would be constructed within the RPA. Potential short-term, indirect adverse impacts to surface waters during construction would be minimized through use of BMPs.
Groundwater & Hydrology	There would be no ground disturbing activity; therefore, there would be no impacts to groundwater or its hydrology.	There would be a net increase in impervious surface area on the campus due to new and expanded buildings (± 111,428 ft ²). To counter this impact, landscaping would include additional trees and native plantings, as well as BMPs such as bioretention basins and rain gardens to enhance water collection/filtration and groundwater recharge.	There would be a net increase in impervious surface area on the campus due to new and expanded buildings (± 111,619 ft ²). To counter this impact, landscaping would include additional trees and native plantings, as well as BMPs such as bioretention basins and rain gardens to enhance water collection/filtration and groundwater recharge.	There would be a net increase in impervious surface area on the campus due to new and expanded buildings (± 96,469 ft ²). To counter this impact, landscaping would include additional trees and native plantings, as well as BMPs such as bioretention basins and rain gardens to enhance water collection/filtration and groundwater recharge.
Land Use Planning & Zoning	The NFATC site is a teaching facility with a campus-like setting, primarily surrounded by residential areas and small parks. No changes to land uses or zoning are anticipated under the No-Action or Build Alternatives. The NFATC site will remain a teaching facility in a campus-like setting, regardless of alternative. No impacts to off-site residential or recreational spaces are anticipated.			

3.0 AFFECTED ENVIRONMENT AND SIGNIFICANCE OF EFFECTS

This chapter describes the existing natural and human environment, as well as the potential environmental impacts associated with the Proposed Action of Build Alternative 1, as described in Chapter 2 and detailed in the 2017 Master Plan Update. The information presented reflects the current conditions, as updated from the March 2005 EA/FONSI for the George P. Shultz National Foreign Affairs Training Center (NFATC).

The full range of NEPA topics was considered for this study. Many topics were eliminated from detailed study because the Proposed Action would cause negligible or no impact. A summary of those topics is presented in Section 3.1. The remaining portion of this chapter addresses those topics for which additional study is warranted to determine whether or not the resources in question are impacted by the Proposed Action.

3.1 NEPA TOPICS ELIMINATED FROM DETAILED EVALUATION

As with any environmental analysis, there are resource issues that are dismissed from further analysis because the Proposed Action would cause negligible or no impact. Negligible impacts are effects that are localized and immeasurable at the lowest level of detection. Therefore, these topics are briefly discussed and then dismissed from further consideration or analysis.

Socioeconomics

Neither the No-Action nor the Proposed Action will impact land use on site or the surrounding areas. Under either scenario, the site will remain a teaching facility with a campus-like setting and the surrounding residential areas will remain the same. With the Proposed Action, the amount of open space located within the facility boundaries will be reduced; however, the reduction will not negatively impact the campus-like setting.

There may be short-term employment increases due to construction activities; however, no significant or long-term changes in area employment are anticipated as a result of the Proposed Action. The No-Action Alternative would not provide for short-term, construction-related employment opportunities. Long-term employment would be similar to that of the Proposed Action.

With the Proposed Action, the future on-campus population will increase by 450 over the No-Action Alternative. However, because student population is largely transient, no long-term demands for housing in the immediate area are anticipated.

Due to training capacity constraints at NFATC, DOS acquired commercial office space in Rosslyn, VA to supplement FSI training facilities on the NFATC campus. The DOS-acquired space totals approximately 175,000 square feet. This is a short-term solution for DOS to accommodate unexpected training requirements at NFATC. Under the Proposed Action, staff and students will return to the NFATC campus when space is available. The DOS release of this space will make available more commercial space options for those seeking such facilities.

Children's Environmental Health

In accordance with Executive Order (E.O.) 13045, Protection of Children from Environmental Health Risks and Safety Risks, neither the No-Action nor the Proposed Action would pose an environmental health or safety risk to children. Under the Proposed Action, all construction activities would occur within a closed campus. The Childcare Center will be constructed and operated in compliance with the requirements of EO 13045.

Public Drinking Water

In their letter dated December 19, 2016, the Virginia Department of Health – Office of Drinking Water, stated: there are no public groundwater wells within a 1 mile radius of the project site; there are no surface water intakes located within a 5 mile radius of the project site; the project is not within the watershed of any public surface water intakes; and there are no apparent impacts to public drinking water sources due to the Proposed Action.

Topography, Geology, and Soils

The No-Action Alternative would not disturb topography, geology, or soils.

There may be short-term and long-term disturbances to the existing topography as a result of the Proposed Action. Soil borings may be taken as needed to determine soil characteristics for use in the design of the Proposed Action. The borings would temporarily disturb a small area. The existing topography and vegetation would be altered by construction because earthwork would be required. All appropriate local and state erosion and sediment control measures would be adhered to during construction activities. After construction is completed, disturbed areas would be landscaped with appropriate vegetative species to enhance the campus setting.

Prior to any ground-disturbing activities associated with the Proposed Action, DOS and/or its contractors will ensure that this project is in compliance with Virginia's Erosion and Sediment Control Law (Virginia Code § 62.1-44.15:61) and Regulations (9 VAC 25-840-30 et seq.) and Stormwater Management Law (Virginia Code § 62.1-44.15:31) and Regulations (9 VAC 25-870-210 et seq.). Because the Proposed Action involves land-disturbing activities of equal to or greater than one acre, DOS and/or its contractors or agents will register for coverage under the Virginia Stormwater Management Program General Permit for Discharges of Stormwater from Construction Activities (9 VAC 25-870-1 et seq.). This includes developing a project-specific Stormwater Pollution Prevention Plan (SWPPP). The SWPPP will be prepared prior to submission of the registration statement for coverage under the General Permit for construction and will address water quality and quantity in accordance with the Virginia Stormwater Management Program (VSMP) Regulations.

Hydrology and Groundwater

There is no permanent surface water located on the site. The NFATC site was previously bisected by one drainageway and skirted by other intermittent/ephemeral tributaries that flowed to Doctors Run and on to Four Mile Run. Through development of the campus and surroundings, these corridors and waterways were interrupted, disconnected, and even buried to create level space suitable for buildings.

The No-Action Alternative would have no additional impact on hydrology or groundwater.

The Proposed Action would result in a net increase in impervious surface area. Therefore, there would be a minor, long-term adverse impact to groundwater. Adherence to best management practices (BMPs) for stormwater will help to minimize this impact. The Proposed Action will be implemented in

compliance with Section 438 of the Energy Independence and Security Act of 2007 (EISA-438), including reducing impervious surfaces, using vegetative practices, porous pavements, cisterns and green roofs. All construction activity would meet or exceed Virginia and Arlington County regulations, as applicable. A Stormwater Pollution Protection Plan (SWPPP), including a Stormwater Management Plan, erosion and sediment control plan, pollution prevention plan, and description of necessary control measures would be developed in accordance with the Virginia Department of Environmental Quality's (DEQ) Virginia Stormwater Management Plan (VSMP) regulations for construction activities and maintained onsite throughout construction.

Floodplains

Federal activities within floodplains must comply with EO 11988: Floodplain Management, 33 C.F.R. 1977 and EO 13690: Establishing a Federal Flood Risk Management Standard (FFRMS) and a Process for Further Soliciting and Considering Stakeholder Input. The Proposed Action identified in the 2017 NFATC Master Plan Update meets the requirements of both EO 11988 and EO 13690 and the 2016 GSA PBS Floodplain Management Desk Guide. In accordance with the FFRMS, the NFATC is not located in a floodplain. Because the NFATC site is not located within the floodplain, the Proposed Action is not expected to have a measurable effect on the frequency, elevation, intensity, or duration of floods, nor would it impact floodplain functions. The No-Action Alternative would continue to be in compliance with EO 11988 and EO 13690.

Vegetative Habitat

Vegetation on campus varies in character, dominated by areas of large, deciduous trees and smaller, ornamental trees and shrubs, as well as mowed lawns and gardens that aid in stormwater management. The existing mature tree canopy has generally been well maintained throughout the campus, enhancing both the historic context and the contemporary landscape efforts on the campus. Tree cover on campus is closely related to campus sustainability goals. Trees reduce urban heat islands and enhance microclimates, stabilize soils, reduce erosion and sediment runoff, reduce stormwater runoff through evapotranspiration, promote infiltration, and slow water movement through the site. The tree canopy also provides critical ecological habitat and contributes to pollinator corridors.

The No-Action Alternative would not alter the existing vegetative habitat on campus.

Under the Proposed Action, the canopy will be supplemented as needed to support new building footprints, security modifications at the entrances, and required stormwater management improvements when projects are implemented. Because the design for the proposed improvements is preliminary, the exact number and type of trees to be lost is not possible to determine. A preliminary estimate based on aerial imagery indicates between 10 and 12 trees overall would be lost. Of the trees to be lost, the majority are oaks.

Vegetation disturbance will be minimized as much as practicable during construction. Perimeter roads and cleared areas on these sites would be kept to a minimum, carefully landscaped, and managed in a manner that addresses security, aesthetics, and natural character. Overall, improvements to the NFATC campus include a landscape plan that promotes the addition of native vegetation and maintains and conserves trees and other vegetation. Therefore, impacts to vegetation from the Proposed Action would be negligible, short-term, and beneficial.

During final design activities, a Landscape Conservation Plan will be submitted to Arlington County officials who will then review the proposed activity to ensure compliance with the county's planting standards. In addition, the DOS and/or its contractors will comply with the county's Tree Protection and Planting Standards⁵.

Surface Waters and Wetlands

There are no wetlands on the NFATC site. An unnamed tributary to Doctors Branch follows the southwestern boundary of the NFATC main campus property boundary. Doctors Branch, a perennial stream, runs parallel to and outside of the southeastern boundary of the main campus. Neither water bodies would be directly impacted by the No-Action or the Proposed Action Alternative.

Wildlife and Aquatic Resources

The wildlife that occupies the NFATC consists of those species that survive in urban conditions, primarily urban birds and squirrels and, on occasion red foxes. These species are not anticipated to be significantly impacted by the Proposed Action.

There are no naturally occurring aquatic resources on the NFATC campus that would be impacted by the No-Action Alternative or the Proposed Action.

Protected Species and Critical Habitat

In accordance with the federal Endangered Species Act (ESA) of 1973, the Virginia Endangered Species Act of 1972 (§ 29.1-563 through 570), and the Virginia Natural Area Preserves Act of 1989 (§ 10.1-209 through 217) the U.S. Fish and Wildlife Service, the Virginia Department of Game and Inland Fisheries, and the Virginia Department of Conservation and Recreation were contacted for consultation in compliance with Section 7 of the Endangered Species Act and Virginia law. No known listed or endangered species, no critical habitat, and no natural heritage resources would be impacted by the No-Action Alternative or the Proposed Action.

Coastal Zone Management

Arlington County is part of the Commonwealth of Virginia's coastal zone. Section 307 of the Federal Coastal Zone Management Act of 1972, as amended, requires that proposed federal activities affecting a state's coastal zone be consistent, to the maximum extent practicable, with a state's federally-approved Coastal Zone Management Program (CZMP). The Virginia Department of Environmental Quality (DEQ) states the Proposed Action will be consistent with the Virginia Coastal Zone Management Program.⁶ The project will be conducted in a manner that is consistent with the coastal lands management enforceable policy of the CZM Program, as administered by DEQ, pursuant to the Chesapeake Bay Preservation Act (Virginia Code §62.1-44.15 et seq.) and the Chesapeake Bay Preservation Area Designation and Management Regulations (9 VAC 25-830 et. seq.).

Neither the No-Action Alternative nor the Proposed Action would have a direct effect on the coastal zone or coastal zone resources and uses. The potential for indirect or direct effects would be nonexistent or minimal for each of the enforceable regulatory programs of Virginia's Coastal Resources Management Program.

⁵ Arlington County, Virginia. *Stormwater Manual: A Guide to Stormwater Requirements for Land Disturbing Activities in Arlington County*. Appendices A through G. January 2017.

⁶ See Appendix B for DEQ's letter to GSA, dated February 7, 2017, regarding the Federal Consistency Determination for this project.

Stormwater Management

The No-Action Alternative would continue to comply with current local, state, and federal environmental requirements including stormwater management and energy conservation.

The 2017 Master Plan Update for the Proposed Action addresses new stormwater requirements with an emphasis on absorption and recharging aquifers. The primary focus of the proposed planting strategy is to provide a diverse and low-maintenance plant palette to support native wildlife, provide seasonal interest, and contribute to environmentally appropriate stormwater collection and filtration. In accordance with LEED guidelines, plant selection will focus on reducing potable water use for irrigation.

Under the Proposed Action, stormwater runoff will be collected and temporarily retained along a continuous network through the campus that has been integrated into the existing topography. In most cases, water may only be visible during large storm events. The soil and plantings that are part of this green infrastructure system will primarily provide infiltration and cleanse and slow any remaining runoff before it enters Doctor's Branch to the south of the campus. The areas where runoff is collected will cultivate a lush plant palette and support native fauna, creating niche eco-amenities. By dispersing the stormwater management system across the NFATC campus in a decentralized approach, the overall sustainability and resilience of this system will be integrated with the overall campus environment and will help move the campus towards its pre-development hydrology.

The Proposed Action would be designed to be in compliance with Section 438 of the Energy Independence and Security Act of 2007 (EISA), requiring federal agencies to reduce stormwater runoff from federal development projects in a manner that is focused on collecting and repurposing stormwater on-site to the maximum extent technically feasible. For more information, refer to the NFATC 2017 Master Plan Update which provides greater detail and exhibits on the proposed stormwater management techniques and the landscape design.

During final design activities, a Stormwater Pollution Prevention Plan (SWPPP) will be submitted to Arlington County officials who will then review the proposed activity to ensure compliance with the county's stormwater standards. In addition, the DOS and/or its contractors will comply with the county's stormwater management⁷ guidelines.

Climate Change and Sustainability

The Proposed Action will be implemented in accordance with the requirements of E.O. 13693, Planning for Federal Sustainability in the Next Decade. The Proposed Action will implement sustainable building design and transportation strategies to address the challenges of climate change and advance projects that will minimize fossil fuel consumption and reduce greenhouse gas emissions. Buildings will be designed to achieve energy, waste, and water net zero use, where feasible.

The Proposed Action for the NFATC 2017 Master Plan Update incorporates sustainable site strategies that will conserve resources, protect the environment, improve employee health and wellness, and reduce operational costs. Improvements proposed under the Build Alternative will meet requirements of the LEED Rating System, as well as all additional Federal Government sustainability goals and Guiding Principles.

⁷ Arlington County, Virginia. *Stormwater Manual: A Guide to Stormwater Requirements for Land Disturbing Activities in Arlington County*. Appendices A through G. January 2017.

Implementation of the Proposed Action will require compliance with federal sustainability goals. Design and construction phases, as well as post-construction operations, have goals to reduce water and energy consumption, improve the health and wellbeing of occupants, reduce pollution and waste, and reduce the impact on the natural environment. Executive Order 13693 - Planning for Federal Sustainability in the Next Decade, and Guiding Principles for Sustainable Federal Buildings, associated instructions, and other applicable standards and requirements will be reviewed prior to the implementation of the Proposed Action. The following sustainability principles are part of the NFATC 2017 Master Plan Update: transportation, parking, stormwater run-off and campus hardscapes, renewable and clean energy, energy and water conservation.

The exact details of these plans and measures will be developed during the course of final design. However, GSA and DOS are committed to ensuring the long-term viability, security, responsiveness, and efficiency of the Federal Government. As proactive Federal partner, GSA recognizes a fiduciary obligation to provide Federal agencies with the spaces, services, products, and vehicles they need to carry out their missions today, while advancing the economic, social, and environmental well-being of the United States tomorrow. GSA also understands its responsibility to the broader public to serve as an economic catalyst while safeguarding our nation's valuable resources and remains committed to operating in a fair, efficient, open, and transparent manner.

Air Quality

The NFATC is located in an area of Ozone Nonattainment and in an emission control area for oxides of nitrogen (NOx) and volatile organic compounds (VOCs). No significant change in air quality is anticipated in local or regional air quality due to the No-Action Alternative or the Proposed Action. No additional parking is to be added to the facility. The potential increase in auto emissions from the projected growth in on-campus populations would not result in significant changes in existing air quality. In addition, the Transportation Management Plan (TMP) prepared for the Master Plan Update includes strategies to reduce the number of individual vehicles traveling to the site; thereby, potentially reducing auto emissions in the region.

During construction activities, DOS and/or its contractors and agents will take the required precautions to restrict emissions, including open burning (9 VAC 5-1 30 et seq.) and fugitive dust emissions (9 VAC 5-50-60 et seq.).

Noise

No substantive increase in ambient noise level is anticipated as a result of the No-Action Alternative or the Proposed Action. Short-term impacts on ambient noise levels may occur during construction activities of the Proposed Action, but this would be temporary. Construction hours would be in accordance with Arlington County code to minimize potential impacts to the surrounding residential neighborhoods.

Utilities and Services

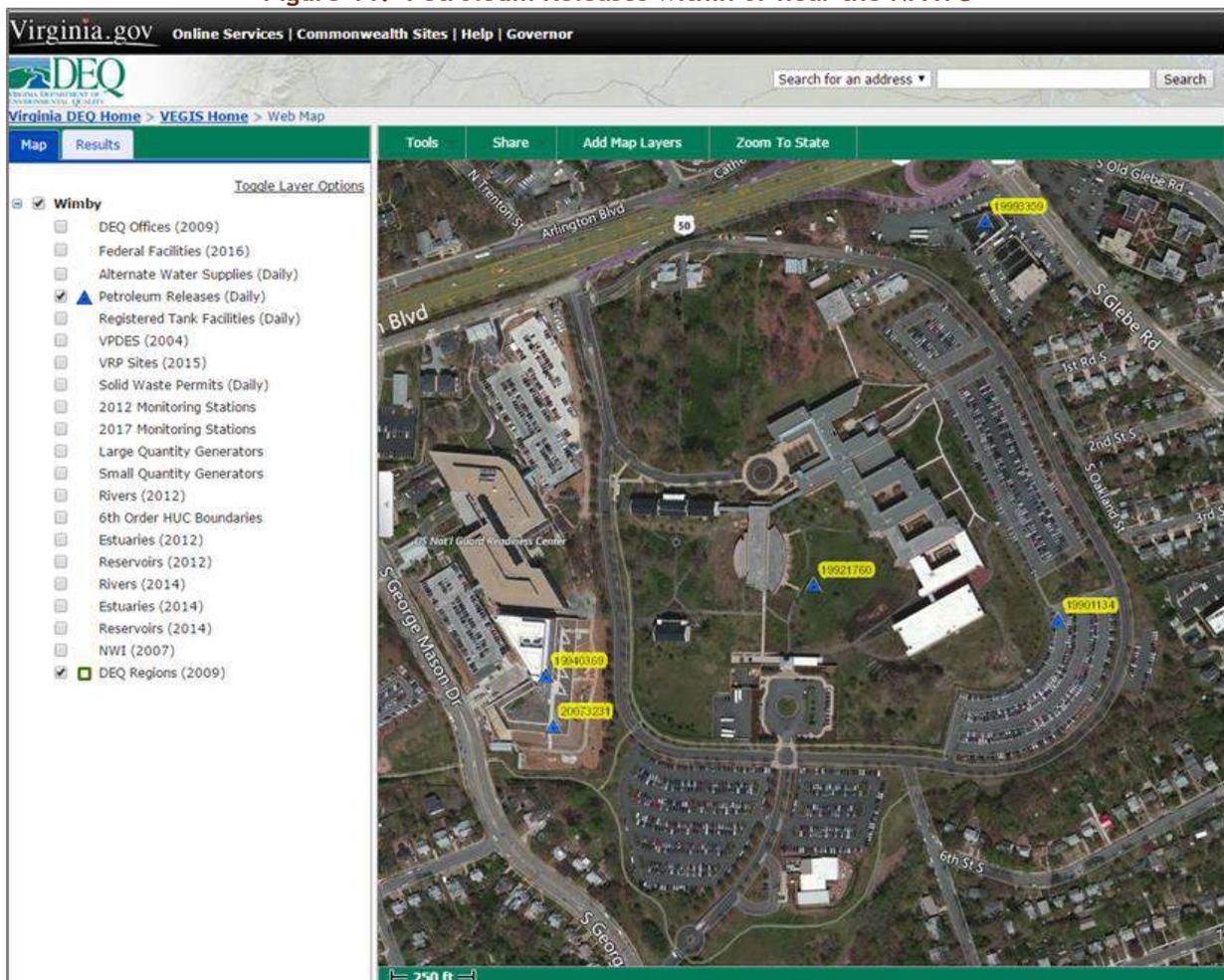
Under the No-Action Alternative, the campus would continue to provide adequate utilities and services. Under the Proposed Action, with the increase in student and staff populations, the power infrastructure would need slight modification. However, the existing 34.5kV loop distribution system would remain unchanged with a few exceptions where new buildings are constructed and there is no nearby transformer. Existing plumbing connections and infrastructure are expected to remain and will adequately serve building expansions and new buildings.

Hazardous, Toxic, and Radioactive Waste (HTRW)

A detailed review of HTRW sites on the NFATC was conducted for this project. Environmental Data Resources, Inc. (EDR) prepared a Radius Map Report with GeoCheck for the area. The findings of the report indicate no recognizable environmental conditions that may have impacted the NFATC property. A subsequent review of the DEQ database revealed four cases of petroleum releases within or adjacent to the NFATC campus between 1990 and 1999 (Figure 11). Following the completion of appropriate clean-up activities, each case has since been closed by DEQ with no further action required.

There are no other waste sites of possible concern within or adjacent to the NFATC campus. In addition, construction of new buildings and expansions of existing buildings will use nontoxic materials both internally and externally. Therefore, the Proposed Action will not have any HTRW impacts. Should a HTRW site be identified, any solid waste, hazardous waste, or hazardous material would be managed in accordance with applicable federal, state, and local environmental regulations. This includes asbestos-containing material (ACM) and lead-based paint.

Figure 11: Petroleum Releases within or near the NFATC



Source: Virginia Department of Environmental Quality. VEGIS – What’s in My Back Yard (Wimby): Petroleum Releases (Daily). Accessed on 2/14/17 at http://www.deq.virginia.gov/mapper_ext/?service=public/wimby#.

Federal Space Management

The Proposed Action and the management of the NFATC site will be in compliance with the requirements of Executive Order 12072: Federal Space Management (43 FR 36869, 3 CFR, 1978 Comp., p. 213).

3.2 LAND USE AND ZONING

3.2.1 Affected Environment

Existing land uses around NFATC are predominantly federal and local government and private residential with scattered commercial uses located mainly along Glebe Road to the east. The closest federal use is the Army National Guard Bureau (NGB) facility adjacent to the northwest side of NFATC. Constructed in 1988 and then expanded in 2011, the Army National Guard Readiness Center building is a 250,000 square foot, 8-story Headquarters and administrative building. To the east, southeast, and southwest, NFATC is surrounded primarily by long-established residential communities, with most homes built in the late 1930s and early 1940s. Residential neighborhoods in the vicinity include Alcova Heights, Barcroft, Arlington Forest, Buckingham, and Arlington Heights; primarily single-family low density and low-medium density residential homes. The Alcova Heights Park and Playground, a neighborhood park along Doctors Run Branch, backs up to the southern corner of the NFATC campus. A number of places of worship are located within nearby residential neighborhoods.

The NFATC is zoned by Arlington County as an “S-3A” Special District “to encourage the retention of certain properties in a relatively undeveloped state. Land so designated may include publicly or privately owned properties which have distinct and unique site advantages or other features so as to make them desirable to retain as active or passive recreation or for a scenic vista. . .”⁸ Within Special Districts, for institutions such as the NFATC, building height limits within zones S-3A are not to exceed 45 feet.

3.2.2 Significance of Effects

Typically, federal facilities are exempt from local zoning ordinances. However, in 1987, a Memorandum of Understanding (MOU) between the Department of the Army and the Department of State was signed that set the conditions for the transfer of Arlington Hall Station from the Army to the DOS and the National Guard Bureau (NGB). Items 13 and 14 of the MOU state that site plans for both the DOS (now the NFATC) and the NGB will be consistent with local zoning and that the MOU may be amended by mutual consent.

Neither the No-Action nor the Proposed Action would change existing land use or zoning.

3.3 RESOURCE PROTECTION AREAS

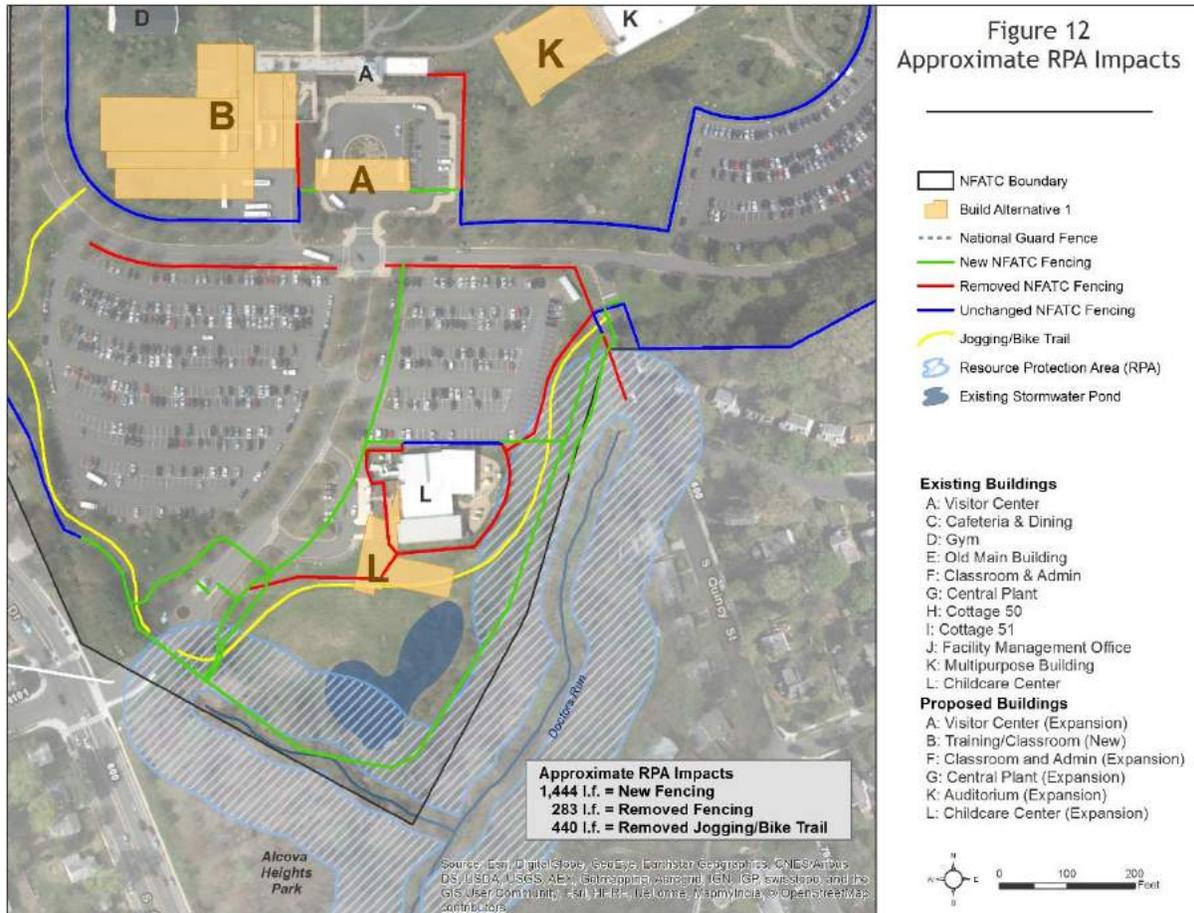
3.3.1 Affected Environment

The Chesapeake Bay Preservation Act of 1988 (CBPA) and Executive Order 13508, Strategy for Restoring and Protecting the Chesapeake Bay Watershed, aim to protect and improve the water quality of the Chesapeake Bay, its tributaries, and other Virginia state waters by minimizing the effects of human activity upon these waters. The Bay Act requires all tidewater localities in Virginia (including Arlington County) to designate Resource Protection Areas (RPAs), which include lands adjacent to water bodies with perennial flow that have an intrinsic water quality value due to the ecological and biological processes they perform or are sensitive to impacts which may result in significant degradation to water

⁸ Arlington County. *Arlington County Virginia: Zoning Ordinance*. Section 4.2, Page 4-5, Adopted 1/28/17.

quality. RPAs include: tidal wetlands; nontidal wetlands contiguous to and connected by surface flow to tidal wetlands or waterbodies with perennial flow; tidal shores; and any other lands that the locality considers necessary to protect the quality of state waters, such as floodplains. RPAs require a buffer area at least 100 feet in width located adjacent to and landward of any of these resources and along both sides of any water body with perennial flow. Within the NFATC property limits, a portion of a RPA buffer along Doctors Run and its intermittent tributary are located to the south and southeast of the Childcare Center (Building L) (Figure 12).

Figure 12: Approximate RPA Impacts



3.3.2 Significance of Effects

Under the No-Action Alternative, there would be no new development on campus; therefore, there would be no impact to surface waters or encroachments into the RPA.

Under the Proposed Action, expansion of the Childcare Center would be outside of the RPA boundary. However, the adjacent construction of perimeter fencing would be within the RPA, as would ground-disturbing activity associated with removing the adjacent jogging/bike trail. As shown in **Figure 12**, approximately 1,444 linear feet (lf) of new fencing would be constructed within the RPA and a combined total of approximately 723 lf of fencing and jogging/bike trail would be removed from the RPA. Removal

of the asphalt trail will eliminate approximately 4,440 ft² of impervious surface area within the RPA and approximately 11,272 ft² or ¼ acre of impervious surface area on campus overall. New fencing would be built on discreet fencing posts, as opposed to continuous footings, to minimize soil disturbance. In addition, impacts to the RPA would be minimized as much as possible by implementing BMPs during construction, including but not limited to the use of silt fences, hay bales, and revegetation of exposed sediment.

In accordance with Arlington County Code (Chapter 61, Chesapeake Bay Preservation Ordinance, § 61-1 to 61-19), a minor water quality impact assessment is required for any land disturbance or development that proposes to disturb up to 5,000 ft² of land in the RPA buffer or proposes to modify or encroach into the RPA buffer. Creating a new structure in the RPA, such as additional fencing, generally requires an exception request from Arlington County. During final design activities, a minor water quality impact assessment will be submitted to Arlington County officials who will then review the proposed RPA activity to ensure that water quality is protected.⁹

A Stormwater Pollution Prevention Plan (SWPPP), including a stormwater management plan, erosion and sediment control plan, pollution prevention plan, and description of necessary control measures would be developed in accordance with VDEQ VSMP regulations for construction activities and maintained onsite throughout construction. Therefore, impacts to the RPA are considered minor under the Proposed Action.

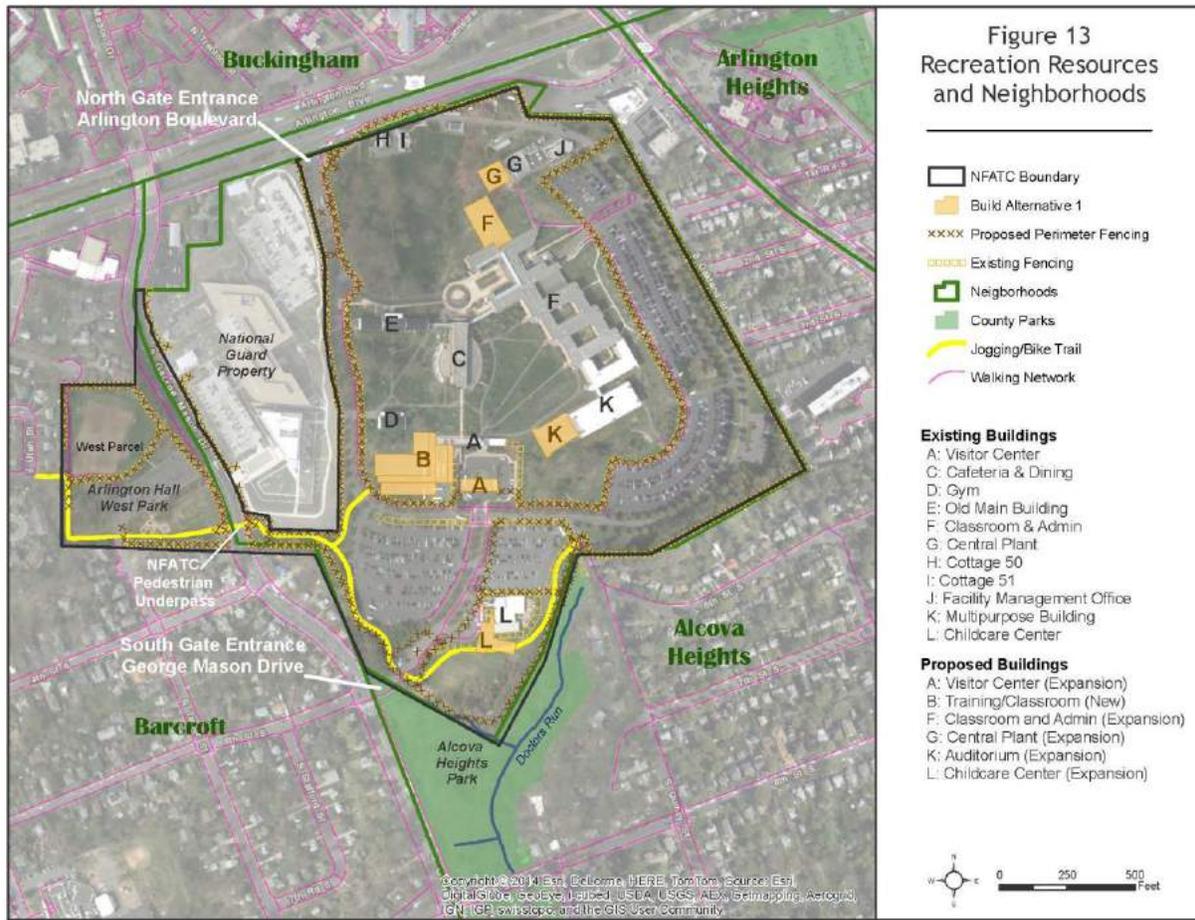
3.4 PARKS AND RECREATION

3.4.1 Affected Environment

Two parks are located adjacent to or within the NFATC campus: Alcova Heights Park and Arlington Hall Park, respectively (Figure 13). Alcova Heights Park is located adjacent to the southern edge of the NFATC site at South George Mason Drive and South 6th Street. This 13-acre park was made possible, in part, by the conveyance of 7.97 acres of the Department of the Army's property to Arlington County in 1959. Today, the park contains a picnic shelter, picnic tables and a grill, public restrooms, playground, baseball field, basketball court, and sand volleyball court, as well as a portion of Doctor's Branch, a small tributary stream to Four Mile Run. In addition, an unimproved dirt path is located just south of the NFATC boundary, between Doctors Run and the private homes adjacent to the park. Pedestrians use the dirt path to gain access to other neighborhoods and as a short-cut.

⁹ Arlington County, Virginia. Arlington County Code, Chapter 61: Chesapeake Bay Preservation Ordinance, §61-1 to 61-19. Accessed on 3-01-17 at <http://arlingtonva.s3.amazonaws.com/wp-content/uploads/sites/22/2014/01/County-Code-61-Chesapeake-Bay-Preservation-Ordinance.pdf>.

Figure 13: Recreation Resources and Neighborhoods



The West Parcel, although federally owned by DOS and within the NFATC property boundary, is maintained by Arlington County as Arlington Hall Park. A Memorandum of Understanding (MOU) between DOS and the county addresses maintenance, hours of availability, and related conditions. The 7-acre park includes a playground, picnic area with grill, and multi-use field for soccer and baseball. The park provides recreation opportunities for NFATC staff and students, as well as the Arlington County community. In addition to recreational use, the West Parcel provides overflow parking for the NFATC campus. Parking for 121 vehicles is located on the parking lot on the lower level of the parcel to the east, near George Mason Drive. The West Parcel is separated from the main NFATC campus by George Mason Drive and the National Guard Bureau site.

3.4.2 Significance of Effects

Neither the No-Action Alternative nor the Proposed Action would directly impact the use of or resources within Alcova Heights Park and Arlington Hall Park. Under either alternative, no changes are proposed to the existing MOU between DOS and Arlington County for Arlington Hall Park, located within NFATC's West Parcel.

3.5 NFATC JOGGING/BIKE TRAIL, PEDESTRIAN TUNNEL, AND NEIGHBORHOOD CONNECTIVITY

3.5.1 Affected Environment

Arlington County is a strong supporter of community walkability to promote the health benefits to its citizens and the environment, to provide commuting options, and to help with community-building. The county is a designated Gold-Level Walk Friendly Community, one of only 15 communities across the nation to receive the Gold rating.¹⁰ A designated walking network is part of the county's Master Transportation Plan. The walking network is shown on Figure 13.

An element of the walking network is the approximately 3,055 foot-long paved jogging/bike trail that runs along the southern edge of the NFATC property, from Quincy Street southwestward past the Childcare Center, then west past the guard station at George Mason Drive, northward towards the National Guard Bureau, then westward to the West Parcel and Arlington Hall Park (Figure 13). Public access to and use of the jogging/bike trail on both the East and West Parcels of the NFATC are stipulated in the 7/30/08 amended MOU between the DOS and Arlington County.¹¹ There are no easements providing for public use of the jogging/bike trail. The MOU states:

B. Ownership

The United States Government, acting through DOS, agrees to permit Arlington County use of the jogging/bike trail, and to provide easements for the water, sanitary, and sewer lines which pass through the East Parcel.

If use of the bike trail negatively impacts on the operations of DOS, Arlington County and DOS shall work together to resolve the problem.

C. Jogging/Bike Trail [East Parcel]

DOS shall maintain a ten (10) foot wide paved jogging/bike trail on the East Parcel from the top of the steps leading from the tunnel under South George Mason Drive to South Quincy Street . . .

D. Arlington County Use

The bike trail shall be accessible to the public during the hours of operation of the West Parcel . . .

Public use of outdoor recreation facilities on the East Parcel shall be allowed subject to control by DOS. . .¹²

Both NFATC staff and students and the surrounding community use the trail daily. In 2016, Arlington County staff conducted a trail use count from September 1st through September 18th.¹³ During that period, the total trail use count was 1,192 individuals with an average daily use of 66 persons. During the week, the periods of greatest use were between 7:00 AM and 5:00 PM, with the hour of 8:00 AM

¹⁰ Walk Arlington. Arlington Brings Home Another Gold with Second Walk Friendly Community Designation. Accessed on 11/16/17 at: <http://www.walkarlington.com/pages/about/arlington-recognized-as-walk-friendly-community/>.

¹¹ The MOU remains in force for a minimum of 10 years from date of signature (7/30/2018) may be terminated if mutually agreed upon, and may be extended an additional 5 year increments if mutually acceptable.

¹² Department of State and County Board of Arlington County, Virginia. *Amended Memorandum of Understanding*. Signed July 2008. Pages 6 and 7.

¹³ The Draft EA incorrectly reported that FSI was responsible for the trail use survey, conducted in September 2016. The survey was actually conducted by Arlington County, with assistance from FSI.

having the greatest use (11 individuals). On the weekends, the periods of greatest use were between 8:00 AM and 3:00 PM, with the hour of 8:00 AM having the greatest use (4 individuals).

Pedestrian access between the West Parcel/Arlington Hall West Park and the East Parcel of the NFATC is provided via NFATC's pedestrian tunnel under George Mason Drive. Current NFATC and National Guard fencing is parallel to the sidewalks along George Mason Drive, prohibiting direct access from the sidewalk to the tunnel. On the eastern side of George Mason Drive, pedestrian access to the tunnel is currently possible by way of the NFATC jogging/bike trail. However, should the NFATC need to be secured, the gates crossing the trail can be locked, thereby cutting-off tunnel access to those without appropriate NFATC-issued security clearance badges.

Comments received during the public scoping process held in July and August, 2016 expressed concern for maintaining public access to this trail. Citizens commented the trail is an important and safe link in pedestrian connectivity between neighborhoods. Use of the pedestrian trail through the NFATC underpass allows for a safe, traffic-free crossing of S. George Mason Drive.

3.5.2 Significance of Effects

The Draft EA stated, "While input from the public scoping process showed a concern to keep the pedestrian trail open to the public, the Proposed Action's impact on neighborhood connectivity would be minor. This determination is based on the limited number of individuals using the NFATC pedestrian trail, as well as the extensive walking network of sidewalks adjacent to campus that offer an alternative to the pedestrian trail." Following public review of the Draft EA, the majority of those commenting on the trail took exception to the Draft EA statement that elimination of the trail would not be a "significant" impact.¹⁴

Further consideration has since been given to the impact of removing the trail from public use. As shown on Figure 14, Arlington County has an established walking network of sidewalks and trails within and adjacent to the NFATC campus. Eliminating public access to the jogging/bike trail would add approximately 1.5 to 6.7 minutes of walking time using an alternate route via sidewalks (Table 6). Closure of the jogging/bike trail would be an inconvenience to those currently using the trail for commuting and recreation; as a short-cut to neighborhoods, community facilities, and community services; and as a safe route to schools.

¹⁴ Under the guidance of NEPA, the term "significant" has specific meaning and implications. Determination of the significance of an impact is based on the consideration of two variables: "context" and "intensity" (40 CFR 1508.27). Context means the significance of an action must be analyzed in its current and proposed short-and long-term effects on the whole of a given resource (e.g.-affected region). Intensity refers to the severity of the effect.

Figure 14: NFATC Jogging/Bike Trail on Secure Campus (No Public Access)

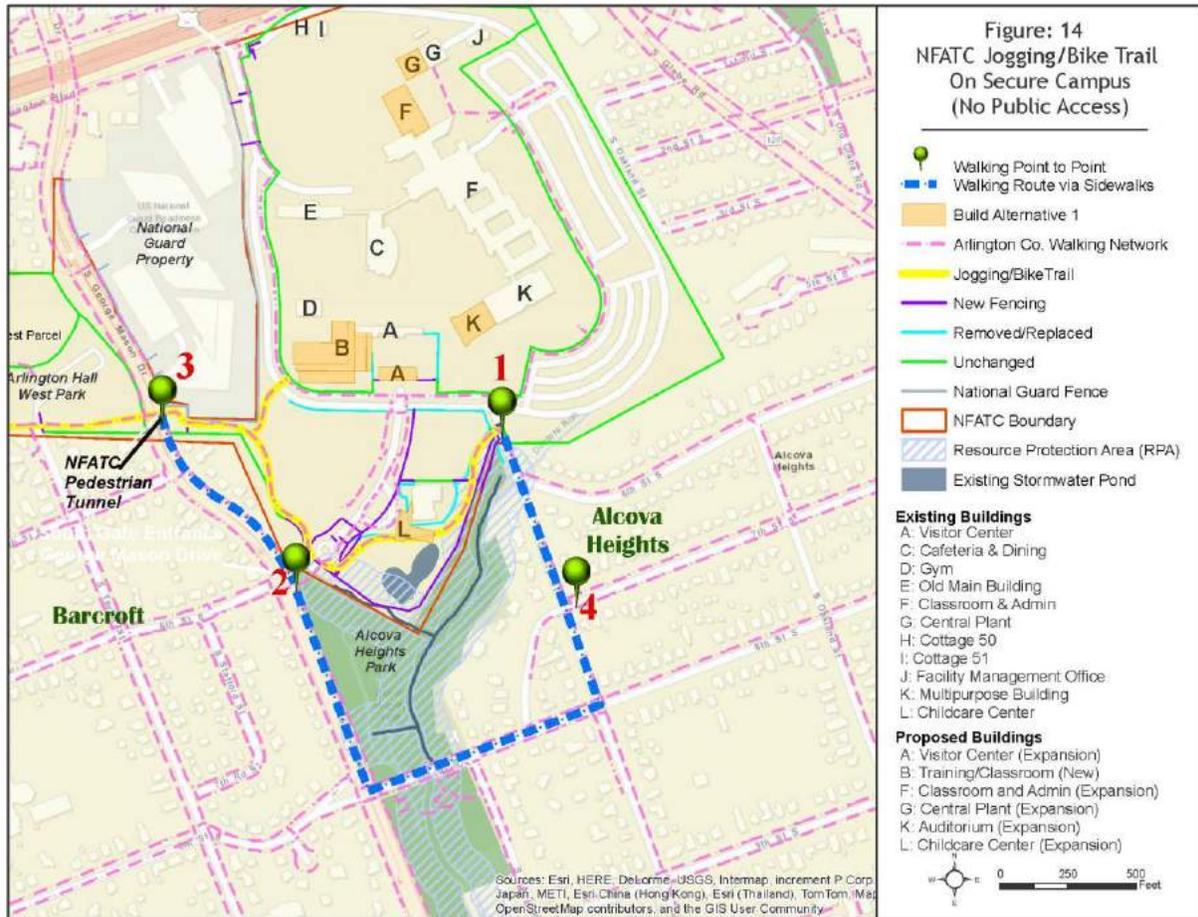


Table 6: NFATC Jogging/Bike Trail vs. Arlington County Sidewalks - Distance and Time

Travel Path	Travel Route Point to Point	Distance feet	Time minutes
NFATC Jogging/Bike Trail:	From P1 to P2 to P3	1,873	7.1
Public Sidewalk:	From P1 to P4 to P2 to P3	3,649	13.8
<i>Additional Distance and Walking Time via Sidewalk</i>		<i>1,776</i>	<i>6.7</i>
NFATC Jogging/Bike Trail and Sidewalk:	From P4 to P1 to P2 to P3	2,569	9.7
Public Sidewalk:	From P4 to P2 to P3	2,966	11.2
<i>Additional Distance and Walking Time via Sidewalk</i>		<i>397</i>	<i>1.5</i>
NFATC Jogging/Bike Trail:	From P2 to P3	882	3.3
Public Sidewalk:	From P2 to P3	810	3.1
<i>Additional Distance and Walking Time via Sidewalk</i>		<i>-72</i>	<i>-0.3</i>

Where:

1 mile = 5,280 feet

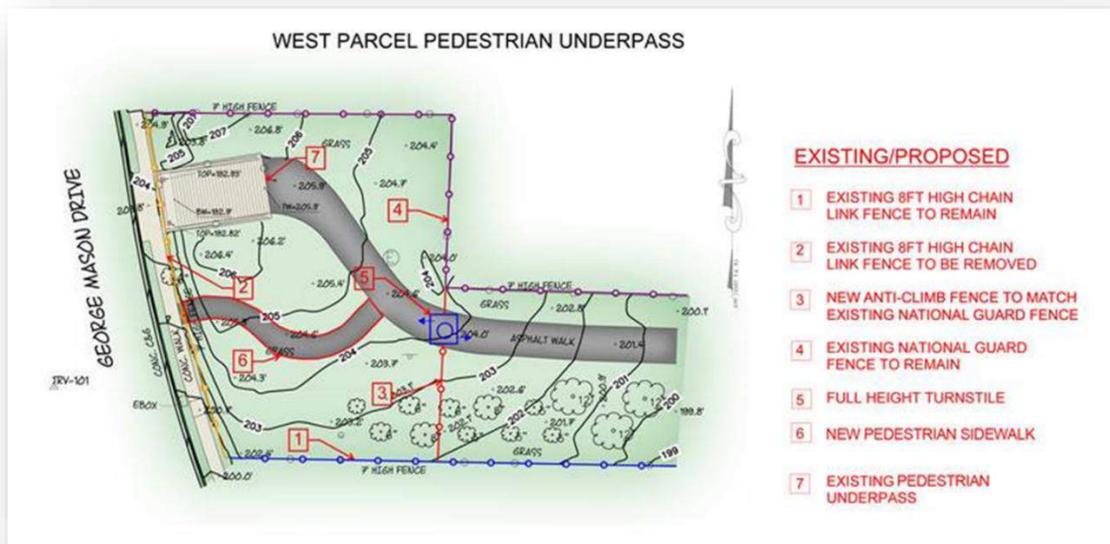
Average walking speed is approximately 20 minutes per mile.

5,280 feet/20 minutes = 264 feet per minute

The need to provide a secure campus is a priority to DOS and FSI and this requires closure of trail access to the general public. As stipulated in the MOU, the DOS, FSI, and the Arlington County Manager are in discussions regarding trail closure. A site visit to the jogging/bike trail was held on January 27, 2017 and was attended by staff from DOS, FSI, GSA, and Arlington County. Opportunities for alternate trail routes and public access points were discussed. GSA, DOS, and Arlington County officials are working to develop an updated MOU to formally address these changes. The 2017 Master Plan identifies the following:

- DOS will permanently close the jogging/bike trail in summer 2017, between Quincy Street and George Mason Drive. In addition, DOS will permanently close public access to the jogging/bike trail section from the George Mason Drive entrance to the West Parcel. At that time, DOS will install new perimeter fencing along the existing NFATC property line and/or along the hill top adjacent to Alcova Heights Park.
- DOS will provide public access to the pedestrian tunnel under George Mason Drive. Currently, NFATC fencing along the sidewalk prohibits access to the tunnel on both the eastern and western sides of George Mason Drive. Pulling back the fencing to allow tunnel access from the sidewalk along the eastern side of George Mason Drive would allow pedestrians to safely cross this busy road (Figure 15). DOS will move the fence back to allow access to the tunnel from the sidewalk. A new trail will be constructed between the sidewalk and the existing trail, providing paved trail connectivity.

Figure 15: Proposed Treatment of NFATC Pedestrian Tunnel to Provide Public Access



GSA and DOS strive to be a good neighbor and will continue to explore opportunities for alternate trail routes and public access points with Arlington County. Decisions regarding alternative trail routes and public access points will be made within the context of an ongoing process that is beyond the scope of this EA. Any future projects identified will comply with the requirements of NEPA.

The impact of closing the jogging and bike trail is not considered significant given the context and intensity of the change. From a context standpoint, this will affect the neighborhoods adjacent to NFATC. The short-term and long-term impacts will be the same. There will no longer be a trail that cuts across the NFATC Campus for public use, however alternative routes are readily accessible that allow for neighborhood connectivity. These include public sidewalks and the Alcova Heights Park's dirt path cut-through. The use of these alternate routes would add between 1.5 to 6.7 minutes to the user's walk from Point 1 to Point 3. While this is an increase in walking time, it is not considered a severe or significant change.¹⁵

From an intensity standpoint the closure of the trail will not negatively affect public health or safety, have an adverse effect on historic resources, park lands, prime farmlands, wetlands, scenic rivers, ecologically critical areas, endangered or threatened species or its habitat. The trail closure will not threaten or violate an Federal, State, or local law or requirement imposed for the protection of the environment.

3.6 LANDSCAPE AND VIEWSHED

3.6.1 Affected Environment

A comprehensive landscape and viewshed inventory and analysis were completed for the NFATC 2017 Master Plan Update, the excerpt of which is provided in Appendix E. As noted in the discussion of land use, views of and from the NFATC campus consist of a heavily wooded campus, established residential neighborhoods, wooded community parks, the National Guard Bureau, and roadways. Portions of the campus adjacent to neighborhoods are wooded and help serve as visual barriers between residences and campus buildings, parking lots, and activities.

3.6.2 Significance of Effects

Under the No-Action Alternative, the viewshed of and from the facility would not change. No mitigation would be required for the No-Action Alternative.

Under the Proposed Action, portions of new and expanded buildings may be visible from within and outside of campus, depending on the viewer's location. While there would be a change to the visual environment, the Master Plan was developed in light of two key design goals: to be sensitive to the visual context of the site and the viewsheds of surrounding residences, as well as to preserve the integrity of the remaining historic elements of the campus, the Arlington Hall Station Historic District, and the adjacent residential historic districts (Barcroft and Alcova Heights). (A discussion of the Proposed Action's effects on historic districts is provided in Section 3.9.) To ensure visual impacts to adjacent neighborhoods are minimized by the Proposed Action, the Master Plan Update included Massing Studies of visible proposed development. To further minimize the potential for visual intrusion, a landscape plan with additional tree plantings is part of the Proposed Action (Figure 16). The new tree plantings would help obscure views of the existing P1 and P2 parking lots, as well as the South Gate entrance and the Childcare Center. Building B would be the tallest of the buildings under the Proposed Action. However, its design would be such that its height would not exceed the highest peak of Building

¹⁵ Under the guidance of NEPA, the term "significant" has specific meaning and implications. Determination of the significance of an impact is based on the consideration of two variables: "context" and "intensity" (40 CFR 1508.27). Context means the significance of an action must be analyzed in its current and proposed short- and long-term effects on the whole of a given resource (e.g.-affected region). Intensity refers to the severity of the effect.

D, the Gym. As such, all proposed buildings would remain consistent with Arlington County’s zoning ordinance for S-3A. Given the preliminary nature of the Proposed Action, details such as exact building height will be determined later in the design process and will be subject to review by the appropriate local, state, and federal authorities.” Views of this new building would be blocked from the west by the eight-story National Guard Bureau complex. The additional tree plantings would help to obscure views of this building from residential areas to the south and the east.

Figure 16: Additional Tree Cover as Visual Barrier



Because a large vegetative buffer surrounds most of the campus and because proposed development is located in the center of the campus, the visual impact on the surrounding communities is expected to be minimal or none at all.

Under the Proposed Action, DOS will refer to the Arlington County Tree Preservation Ordinance, Standards for Preservation and Planting of Trees, Tree Replacement Guidelines, and the Invasive Plant List for guidance when designing the landscape for the new facilities.

This impact is not considered significant. No mitigation would be required for impacts associated with the Proposed Action.

3.7 ENVIRONMENTAL JUSTICE

3.7.1 Affected Environment

EO 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, directs that " ... each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health and environmental effects of its programs, policies, and activities on minority populations and low-income populations " GSA is a member of the Interagency Federal Working Group (IWG) on Environmental Justice and, in accordance with the EO, complies with the provisions of the EO and assesses Environmental Justice issues as part of its NEPA review and analysis.

A minority individual is defined as any individual that is nonwhite or identifies as Hispanic or Latino. IWG guidance states that a "minority population" may be present in an area if the minority population percentage in the area of interest is "meaningfully greater" than the minority population in the general population, and/or if the minority population of the affected area exceeds 50 percent.

A low-income individual is defined as any individual receiving a total family income below the applicable poverty threshold, as derived from the Office of Management and Budget's (OMB) Statistical Policy Directive 14. A low-income population is defined as any census tract with a higher percentage of low-income individuals than the City or County population as a whole.

At a block group level, current data from the U.S. Census and the American Community Survey (ACS) were reviewed for the NFATC campus and the ten adjacent block groups. Figure 17 shows the minority and low-income populations in the area, including the ten block groups adjacent to the NFATC. Table 7 provides block group comparisons relative to Arlington County and Virginia. Both the NFATC block group and the "Buckingham" area block group¹⁶ are meaningfully greater than the general Arlington County minority population by 11% and 5%, respectively. The Buckingham block group has a minority population of 64% and a low-income population of 53%. The NFATC block group has the second highest minority population at 48%. There are no other low-income populations within the NFATC or remaining adjacent block groups.

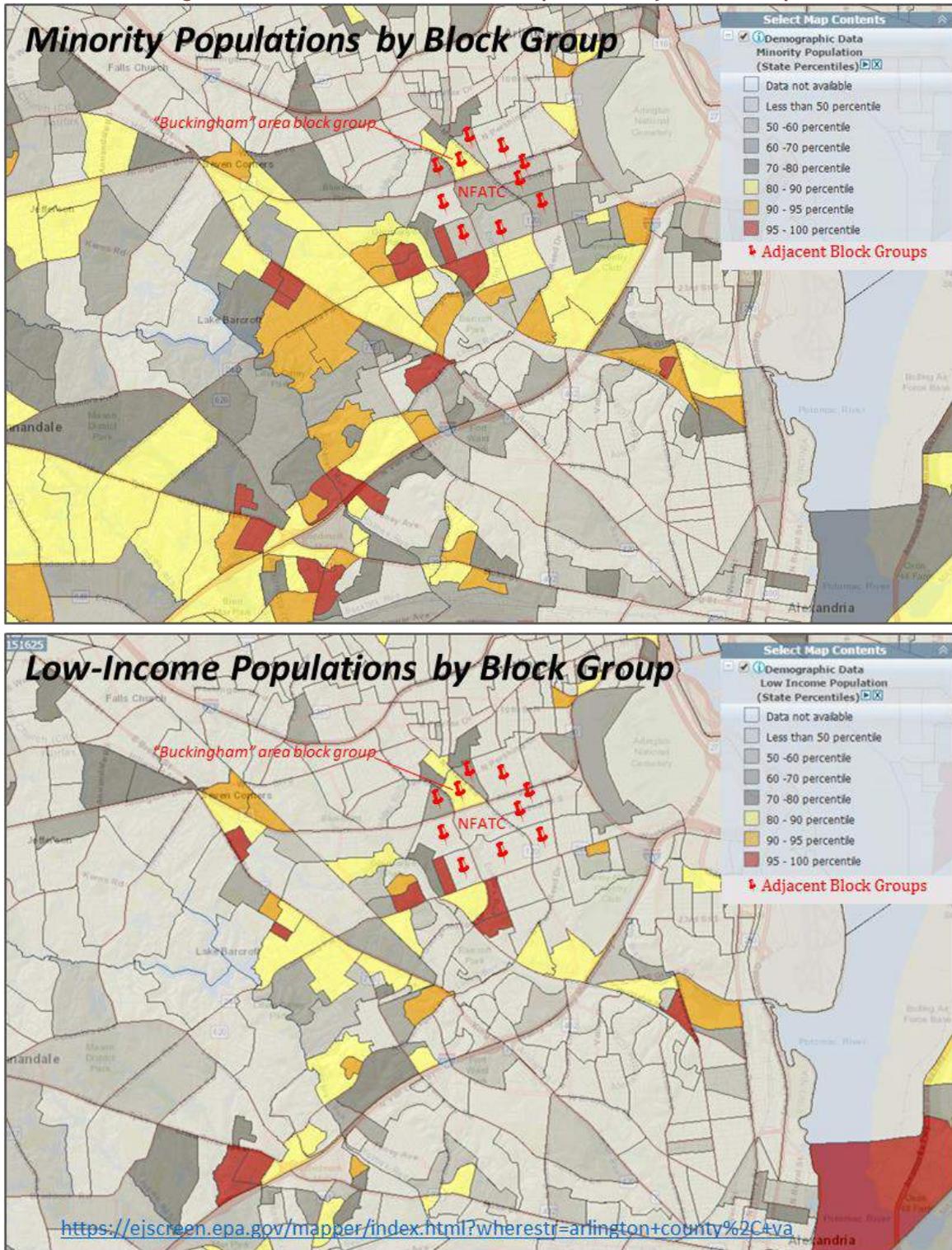
Table 7: Environmental Justice Populations

% Environmental Justice Population	NFATC Block Group Only	NFATC Block Group & 10 Adjacent Block Groups	Arlington County	Virginia
Minority	48%	42%	37%	36%
Low-Income	4%	17%	18%	27%

Source: Environmental Protection Agency. EISCREEN Report (Version 2016). Accessed online on 11/09/16 at: <https://www.epa.gov/environmentaljustice>.

¹⁶ The "Buckingham" census block group (ID # 510131020032) is bounded by 4th Street to the north, N. Glebe Road to the east, Arlington Boulevard to the south, and N. George Mason Drive to the west.

Figure 17: Environmental Justice Populations by Block Group



3.7.2 Significance of Effects

While minority and low-income populations are present within the Buckingham block group, neither the No-Action Alternative nor the Proposed Action would result in a disproportionately high and adverse impact on environmental justice populations. Because the Proposed Action is contained within the existing boundaries of a secured installation, the adjacent populations would not experience adverse impacts to mobility, community access and functions, or the ability to receive goods and services.

During the public scoping process described in Section 1.4.1, the public was invited to attend a public scoping meeting on the project. The meeting was an effort to reach out to all members of the community, including environmental justice populations. Over 200 postcard invitations were sent to adjacent homeowners and homeowner/condominium associations in the 10 adjacent block groups; public notices were posted in local and national newspapers; and a public scoping meeting announcement was posted on GSA's project website. Information presented at the meeting, including handouts, comment sheets, and display boards, were also posted on GSA's project website. The meeting was held within two blocks of the NFATC campus and adjacent to the Buckingham block group. The meeting was attended by 17 individuals and a total of eight written comments were submitted by the general public. None of the comments received indicated concern for the Proposed Action's impact on minority or low-income populations. Therefore, no disproportionately high or adverse impacts will result to minority populations under either the No-Action or Proposed Action alternative. This impact is not considered significant. No mitigation would be required for the Proposed Action.

3.8 PERIMETER SECURITY

3.8.1 Affected Environment

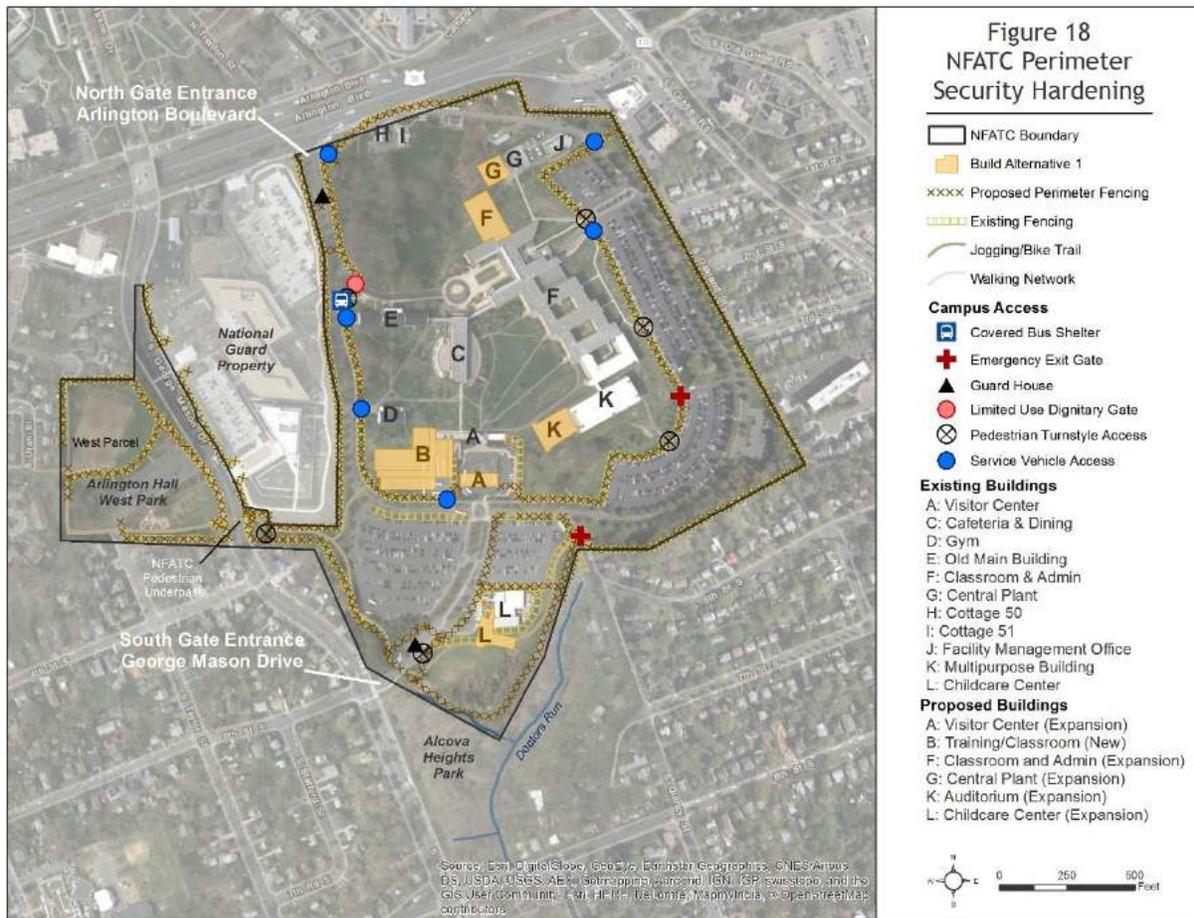
Worldwide terrorism and increased threats against federal enclaves and employees have resulted in enhanced federal security requirements for federal facilities. The perimeter of the NFATC campus must be made secure and done so in accordance with the standards set forth in "The Risk Management Process for Federal Facilities: An Interagency Security Committee Standard August 2013 – 1st Edition" (issued pursuant to Executive Order 12977, October 19, 1995, as amended by Executive Order 13286, March 5, 2003). The DOS considers perimeter security upgrades at the NFATC campus to be a high priority; campus security will be enhanced by protecting guards and discouraging and resisting attacks.

3.8.2 Significance of Effects

Figure 18 illustrates existing and proposed perimeter security such as fences and pedestrian turnstiles. Under the No-Action Alternative, no perimeter security improvement measures would be implemented and the NFATC campus would be in violation of the above security standards.

As part of the Proposed Action, physical security improvements would be implemented in accordance with the above security standards, including updating entrances with new turnstiles, modern guard booths, bollards, and the installation of security fencing at the outer perimeter of the campus. The visual and aesthetic impact on the NFATC campus and on surrounding neighborhoods are considered minimal.

Figure 18: Perimeter Security Hardening



Operational security improvements include physical screening of vehicles and first-time visitors who will be required to enter through the Arlington Boulevard (Route 50) North Gate entrance. Currently, visitors are allowed to enter through both the North and South Gate entrances. The new security features improve protection and security for employees, their families, students, and visitors to the campus.

Under the Proposed Action, the effects of a secure campus on the surrounding neighborhoods and community are addressed in Section 3.5.2. Measures to reduce the effects of a closed campus on the surrounding neighborhoods and communities are also addressed in Section 3.5.2. Perimeter security improvements require removal of the jogging/pedestrian trail from public use.

3.9 HISTORIC RESOURCES

3.9.1 Affected Environment

The NFATC site was originally a women’s finishing school known as Arlington Hall Junior College. Construction of the school was begun on the then wooded 86-acre site in 1926 with the school ceasing

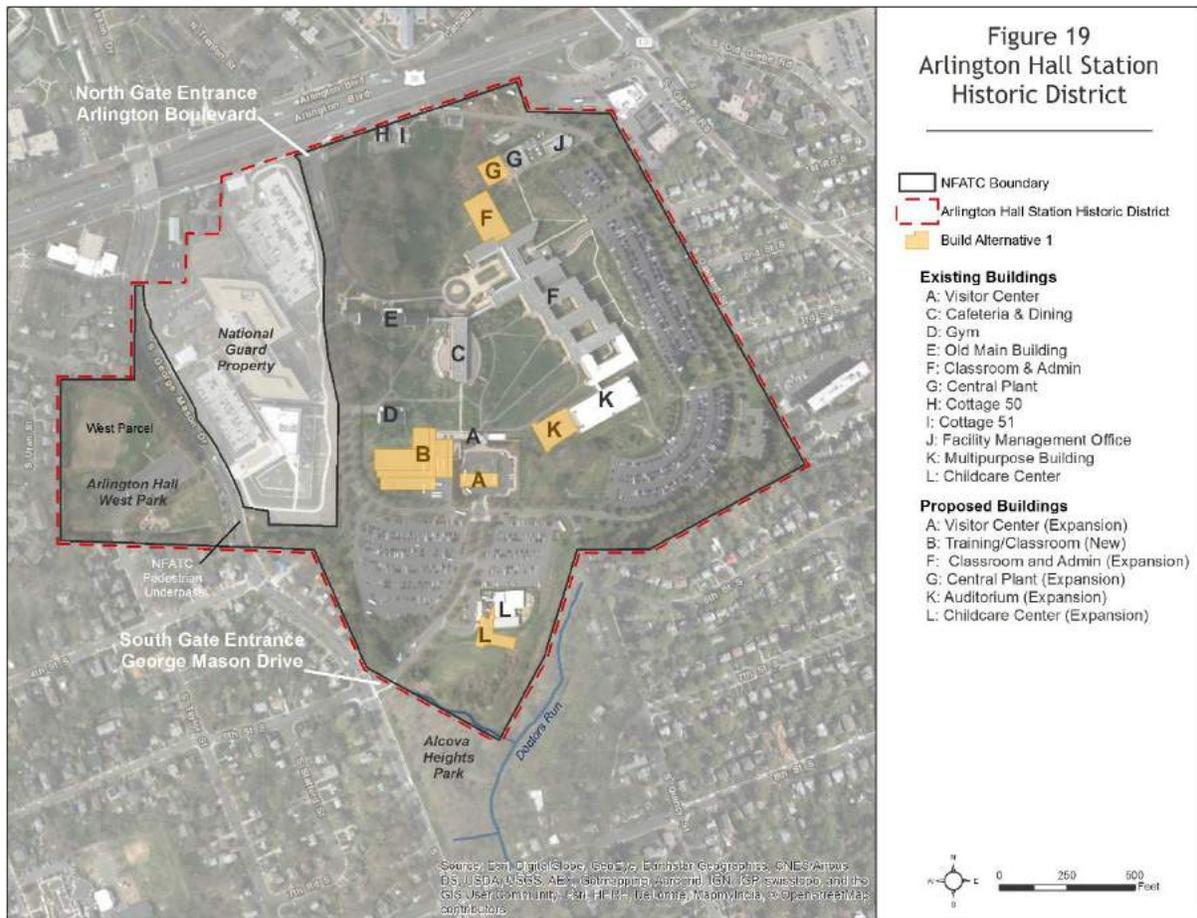
operation in 1942.¹⁷ Buildings to support a finishing school, and later a college preparatory curriculum, were developed. The grounds and a gymnasium building supported a variety of sports activities including field hockey, tennis, shooting, and horseback riding. The site continued to be known as Arlington Hall as it served as the headquarters for the U.S. Signal Intelligence Service beginning in 1942, through World War II and beyond. By 1944, 700 enlisted personnel, 200 officers, and 2,227 civilian employees were housed at the site. During the World War II years, the site was developed with many temporary and some permanent structures to accommodate the influx of personnel. U.S. Army intelligence functions remained on-site until they were relocated to Fort Belvoir in 1989. A Master Plan to convert the campus to the NFATC was prepared in 1989 and approved by the National Capitol Planning Commission (NCPC) in 1990. In addition to retaining four of the junior college era buildings, several new structures and surface parking lots were constructed in the following years. The new buildings included academic and campus support structures.

The NFATC facility was eligible as a historic district (Arlington Hall Station Historic District - DOE 10-07-1988) for the National Register of Historic Places (NRHP) in 1988. At that time, the campus contained the original buildings of the Arlington Hall Junior College (1924-1942) and the buildings constructed during World War II when the U.S. government acquired the property to relocate the U.S. Signal Intelligence Service from Washington, DC. During the U.S. Army period, the property was known as Arlington Hall Station. At the time of the NRHP eligibility determination, the historic district contained as contributing features, all buildings, structures, and landscape features constructed prior to 1946, including all temporary, semi-permanent, and permanent World War II buildings. In 1989, the U.S. General Services Administration (GSA) and the State Department entered into a Memorandum of Agreement (MOA) with the Virginia Department of Historic Resources, the State Historic Preservation Office or SHPO for Virginia. The MOA established that the State Department would be the tenant of the property. Between 1989 and 2015, all World War II-era buildings were demolished and replaced with new construction. The only remaining historic structures are those from the Arlington Hall Junior College (Buildings D, E, H, and I).¹⁸ Figure 19 shows the boundary of the historic district relative to the Proposed Action.

¹⁷ The original boundary of the Arlington Hall Junior College serves as the boundary of the Arlington Hall Station Historic District.

¹⁸ Page 84 of the original 1988 EA states that “The Master Plan proposes to eliminate all existing structures on the site, with the exception of the gymnasium, the middle section of the 1927 girls school building, and the two cottages at the northern edge of the site, including the landscaped areas between those two buildings, which are of historic value.” Page 84 of the 1988 EA further states that, “Other than the Main Building [Old Main or Building E], the gymnasium [Building D], and the Cottages [Buildings H and I], no other structures on the site are considered distinctive.” The requirements of Section 106 were not considered applicable to the demolition of all remaining buildings associated with the girls school and US Army buildings constructed during World War II.

Figure 19: Arlington Hall Station Historic District



3.9.2 Significance of Effects

An assessment of historic resources was conducted for the 2017 Master Plan Update. The preliminary findings were used to initiate Section 106 consultation (see Appendix C, Section 106 Consultation) with the Virginia Department of Historic Resources (SHPO).

3.9.2.1 Archaeological Resources

The preliminary assessment for archaeology was performed pursuant to all pertinent cultural and historic resources laws, regulations, and guidelines, including the National Environmental Policy Act of 1969; Section 106 of the National Historic Preservation Act of 1966, as amended; the Virginia Antiquities Act (Code of Virginia § 10.1-2300); *Guidelines for Conducting Archaeological Survey in Virginia* (effective July 15, 2009); and other guidelines and regulations promulgated by the Virginia Department of Historic Resources (SHPO), as necessary. Technical personnel conducting this work meet the qualifications specified in the *Secretary of the Interior’s Professional Qualification Standards*, and published in 36 CFR §61.

The archaeological area of potential effects (APE) was determined to consist of the boundaries of the Arlington Hall Station Historic District, minus the National Guard Bureau property (Figure 19). In a letter

dated July 28, 2016, the SHPO concurred with this determination and recommended a Phase I archaeological survey be conducted only in those portions of NFATC not disturbed by 1991 construction activities. Aerial photographs from the time reveal that the majority of the main campus had been graded by heavy machinery during the demolition of the U.S. Army's former base. As shown in Figure 20 and Table 8, four areas totaling 9.8 acres within the archaeological APE were determined to have the potential to yield archaeological resources because they were not likely impacted by ground disturbing activity.

Figure 20: Sites Requiring Phase I Archaeology Survey & Areas of Prior U.S. Army Development

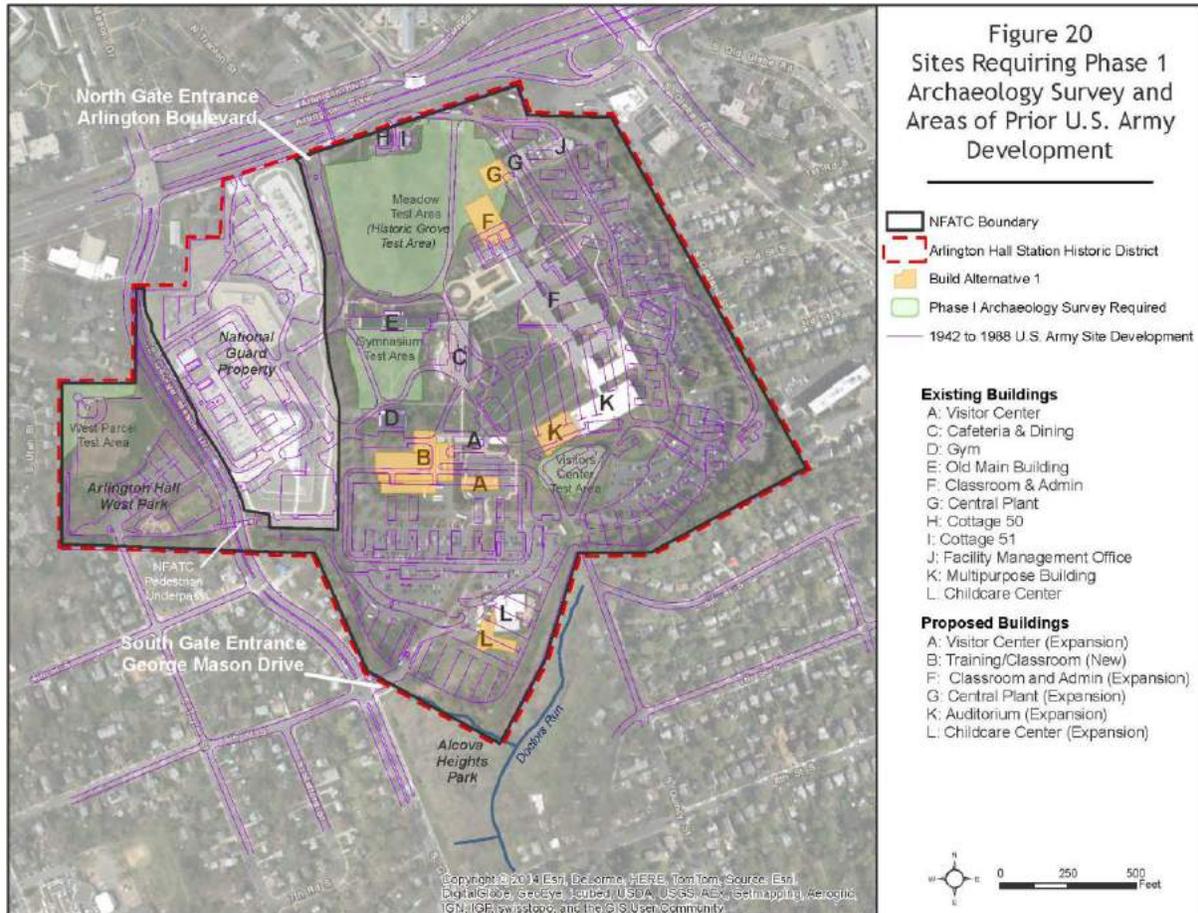


Table 8: Archaeological Test Areas and Proposed Action

Test Area Requiring Phase I Survey	Total Size of Test Area	Acreage of Proposed Action within Test Area
The Meadow Test Area ¹⁹ <i>a.k.a. The Historic Grove Test Area</i>	6.6 acres	0.4 acre Where: Building F = 0.21 acre Building G = 0.16 acre
The Gymnasium Test Area	1.7 acres	0 acres
The Visitor Center Test Area	0.8 acres	0 acres
The West Parcel Test Area (northwest corner only)	0.7 acre	0 acres

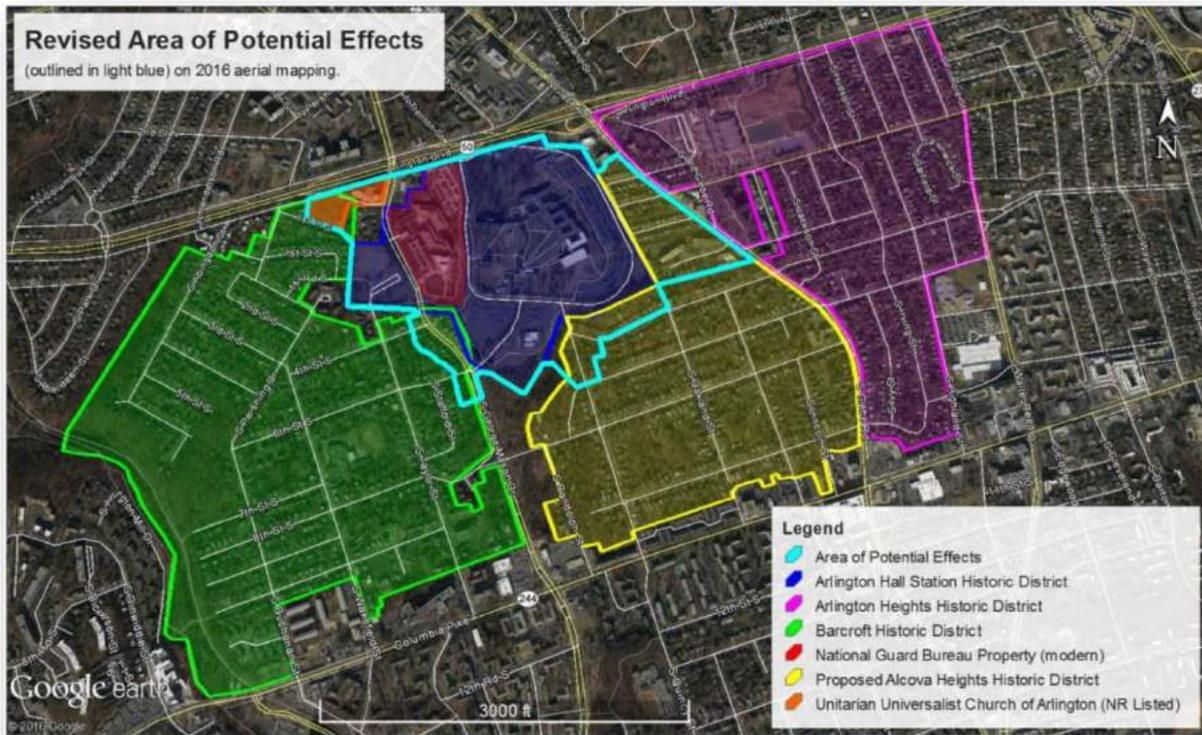
The SHPO stated that, should construction activities disturb any of the above test areas, a Phase I archaeological survey would be required prior to construction. Because construction of the various buildings and improvements under the Proposed Action would be phased over time, a Programmatic Agreement (PA) between GSA, DOS, FSI, SHPO, the Advisory Council on Historic Preservation (ACHP), NCPIC, and other consulting parties is currently being developed. The PA will establish the protocol for continuing the Section 106 process as construction plans for the Proposed Action advance. The PA will be signed prior to NCPIC approval and will be executed prior to any construction activities on the NFATC.

3.9.2.2 Historic Resources

Figure 21 illustrates the area of potential effects (APE) for historic resources for the 2017 NFATC Master Plan Update, as defined in 36 CFR Part 800. The APE is outlined in light blue in Figure 21. The SHPO historic site files indicate the presence of one historic district within the NFATC property lines, the Arlington Hall Station Historic District (DHR ID#000-0018) and one historic district due east of the site, the Arlington Heights Historic District (DHR ID#000-3383). In addition, there are two potentially eligible historic districts, as determined by the SHPO, adjacent to the NFATC site: the Barcroft District and the Alcova Heights District. Portions of the Barcroft District and the Alcova Heights Neighborhood were determined to be within the APE. No prior eligibility determination has been made for the Alcova Heights Historic District, though the majority of properties in the neighborhood have been individually surveyed. For Section 106 review purposes, GSA will consider the Alcova Heights Neighborhood as NRHP-eligible. As shown in Figure 21, two additional historic properties were included in the APE: the NRHP-listed Unitarian Universalist Church (DHR ID#000-34240) of Arlington and a portion of the NRHP-eligible Arlington Heights Historic District.

¹⁹ The term “Meadow” was used in some historic documents to refer to the area between original buildings “Old Main” (Building E) and “The Cottages” (Buildings H and I). See *Arlington Hall Station Historic Resources Assessments, Volumes 1 and 2* (June 1988), by Browne, Eichman, Dalglish, Gilpin, & Paxton, PC. However, during the preparation of this EA, the “Historic Grove” area was inadvertently labeled as the “Meadow Test Area”.

Figure 21: Historic Structures Area of Potential Effects



GSA has applied the Criteria of Adverse Effects to the 2017 NFATC Master Plan Update, per 36 CFR 800.5(a)(1), and has determined that components of the Proposed Action, including implementation of perimeter security fencing, have the potential to be incompatible with the architecture of contributing historic features in the Arlington Hall Station Historic District.

Several steps were taken during the preliminary development of the Proposed Action to minimize and/or reduce impacts to Section 106 resources, including a massing study, a viewshed analysis, and further examination of the APE. The Gymnasium (Building D) is an original building on campus. Prior to shifting Building B to the south (as was shown in the Draft EA), Building B would have been approximately 26 feet to the east of the gym and approximately 64 feet to the south of it. As illustrated in Figure 10, the now shifted Building B would be approximately 30 feet to the east of the gym and approximately 93 feet to the south of it. To minimize the potential for visual effects on campus and surrounding residential historic districts, Building B was depressed with one floor underground and outdoor activities associated with Building B occurring on the opposite sides of the building, outside of the viewshed of the gym and other contributing features of the Arlington Hall Station Historic District. Depressing at least one floor of Building B helps to reduce the visual mass and size of Building B relative to the Arlington Hall Station Historic District and the adjacent historic districts. In addition, the bulk of Proposed Action would be located within the center of the campus, shielding the views of new and expanded buildings from adjacent neighborhood historic districts.

GSA and DOS have consulted with SHPO and determined that the Proposed Action has the potential to have an adverse effect on the Arlington Hall Station Historic District. GSA and DOS will address the

archaeological investigation procedures in the PA as action items to be conducted prior to any construction. GSA, DOS, SHPO, ACHP, and NCPC will have a signed PA in place prior to the approval of the 2017 Master Plan Update by the NCPC and will consult on design submissions for new construction and archaeology investigations to address potential adverse effects that may result. Additional or different treatments to further minimize adverse effects may result during further Section 106 coordination efforts and the completion of the PA.

3.10 TRAFFIC VOLUMES AND LEVELS OF SERVICE

3.10.1 Affected Environment

As part of the Master Plan Update, a traffic study was conducted to determine the impacts associated with the No-Action Alternative and the Proposed Action. The detailed NFATC Traffic Study (Appendix D) is based on existing and projected on-campus population, as well as the existing roadway network.

FSI provides specialized training for a diverse and dynamic DOS population through one-on-one instruction, classroom courses, and a vast e-learning program targeted to the employees at the worldwide US Embassies and Missions. Course durations can last from a couple of hours up to an entire year. FSI also offers informal briefings, workshops, and access to information for family members of those individuals assigned to US Embassies and Missions abroad. The constant “man-in-motion” nature of the FSI workforce results in the population of the campus varying widely. Campus population is fluid and changes on a weekly basis; impacted by numerous factors such as registered students, on-site staff, family visitors attending informal workshops or undertaking research, guest lecturers, other DOS and government visiting personnel, and outside consultants. In general, sustained peaks occur when newly hired and existing Foreign Service personnel, transferring to new posts, are assigned to long-term language and management programs. Due to rotational post assignments, this population necessarily overlaps with students already in training who are completing their courses or foreign language testing.

NFATC can be accessed by an extensive network of local streets including Route 50 (Arlington Boulevard); George Mason Drive, and Glebe Road (VA Route 120). In 1958, the Department of the Army granted an easement to Arlington County for the construction of George Mason Drive across Arlington Hall Station, thereby splitting it into the West Parcel and the East Parcel. The easement length was approximately 1,044.37 feet between the northern and southern limits of Arlington Hall Station at that location.²⁰ The primary road system within the NFATC campus consists of a two-way main loop road, 36 feet wide, that provides access to the parking areas surrounding the building complex. Currently, there are no traffic volume problems on the existing, internal road network.

The operational analysis for the existing conditions was conducted using the HCM 2000 module of the Synchro v8.0 software, as specified by the *VDOT Traffic Operations Analysis Tool Guidebook*. **Figure 22** shows the seven intersections analyzed for the traffic study. Level of Service (LOS) is a standardized measure of traffic engineering programs. It indicates the operability of an intersection based upon the delay encountered by a vehicle using that intersection. LOS rankings were calculated for each intersection during the AM and PM peak demand periods to analyze and compare intersection operations and traffic service levels. A letter grade A-F, defines an intersection’s ability to pass traffic through the intersection. A LOS (A) represents excellent free flow conditions and LOS (F) represents

²⁰ U.S. Department of the Army. Easement for Road or Street on Arlington Hall Station, Arlington, Virginia (DA 49-080 ENG-4368). July 15, 1958.

failing conditions. LOS (D) is considered to be the worst tolerable ranking and still be considered an acceptable condition. In comparison, an intersection at LOS (F) represents a situation in which the drivers experience significant delays, having to wait through multiple cycles before passing through.

The results of the analysis show that all of the intersections included in the study currently operate at LOS C or better during the AM peak hour. Individual turning movements or approaches that operate at LOS E or LOS F during the AM peak hour are listed below:

- Glebe Road @ Route 50 North – Westbound approach from Route 50 westbound off ramp.
- Glebe Road @ Route 50 South – Eastbound approach from Route 50 eastbound off ramp.
- George Mason Drive @ 8th Street – Eastbound approach from 8th Street.
- George Mason Drive / 6th Street (South Gate) – Eastbound and Westbound approaches.

Figure 22: Traffic Analysis - Intersections Studied



During the PM peak hour, all of the study intersections currently operate with an overall LOS C or better with the exception of the unsignalized intersection of George Mason and 6th Street, which operates at LOS F. The significant delay results from large northbound and southbound traffic volumes containing very few traffic flow gaps to allow for the turning movements from the eastbound and westbound approaches. Individual turning movements or approaches that operate at LOS E or LOS F during the PM peak hour are listed below:

- Glebe Road @ Route 50 North – Westbound through movement and left turn from Route 50 westbound off ramp
- Glebe Road @ Route 50 South – Eastbound approach from Route 50 eastbound off ramp
- George Mason Drive @ 8th Street – Westbound approach from 8th Street
- George Mason Drive / 6th Street Gate Access (South Gate) – Eastbound and Westbound approaches

3.10.2 Significance of Effects

The future conditions for the No-Action and the Proposed Action were analyzed for a full build-out year of 2025. For both scenarios, the daily, on-campus staff and faculty population remained the same at 1,400. The daily student on-campus population was projected to have an annual increase of 3%. The only difference between the No-Action and Proposed Action in the year 2025 would be the total number of students on campus. Under the No-Action Alternative, due to the unavailability of training space, 450 students would attend off-site training at the DOS-acquired facility in Rosslyn. Under the Proposed Action, the off-site training would cease and all training would be consolidated at the NFATC. An additional 450 people would be on-campus under the Proposed Action. Table 9 shows the on and off-campus populations used to generate traffic volumes and levels of service.

Table 9: Campus Population

No-Action Alternative						
Fiscal Year	Daily Off-Campus Population	Daily On-Campus Population				Total Population Increase from Fiscal Year 2015
		Students	Student Population Increase from Fiscal Year 2015	Faculty	Total	
FY2015	0	1,765	0	1,400	3,165	0
FY2025	450	1,959	11%	1,400	3,359	6%

Build Alternative 1 - Proposed Action						
Fiscal Year	Daily Off-Campus Population	Daily On-Campus Population				Total Population Increase from Fiscal Year 2015
		Students	Student Population Increase from Fiscal Year 2015	Faculty	Total	
FY2015	0	1,765	0	1,400	3,165	0
FY2025	0	2,409	37%	1,400	3,809	20%

To determine the potential impacts of the two alternatives, a trip generation analysis was conducted based on the population projections presented in Table 9, as well as growth and campus access assumptions provided in the NFATC Traffic Study (Appendix D). For comparison purposes, the results of the 2005 trip generation analysis are presented with the current trip generation results (Table 10).

Table 10: LOS Comparison - 2005 and 2016 NFATC Traffic Study Results

INTERSECTION	2005 NFATC Traffic Analysis						2016 NFATC Traffic Analysis					
	2004 "Existing Condition"		2014 "Projected" No-Action Alternative		2014 "Projected" Proposed Action Alternative		2015 "Existing" Condition		2025 No-Action Alternative		2025 Proposed Action Alternative	
	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM
Glebe Road @ Rt. 50 - WB Off	B	B	D	C	D	C	C	C	D	C	D	C
Glebe Road @ Rt. 50 - EB Off	C	B	D	D	D	D	B	B	B	B	B	B
George Mason Drive @ Rt. 50 - WB Off	B	C	B	D	B	C	C	C	C	C	C	C
George Mason Drive @ Rt. 50 - EB Off	B	B	C	B	C	B	C	B	C	B	D	B
George Mason Drive @ 8th Street	B	A	B	B	C	B	B	B	B	B	B	B
George Mason Drive @ 6th Street (unsignalized)*	F	F	F	F	F	F	F	F	F	F	F	F

*The 2005 NFATC Traffic Analysis reports the LOS for the minor approach of an unsignalized intersections instead of the overall intersection LOS. The same minor approach LOS from the 2016 Traffic Analysis is shown in this table for a direct comparison.

The results of the 2025 No-Action operational analysis show that the intersections studied will operate with similar LOS and slightly higher delays when compared to the existing, 2015 conditions. During the AM peak hour, all of the study intersections will continue to operate at a LOS C or better. The individual turning movements that operated with a LOS E or LOS F in year 2015 will continue to operate at those service levels. The queue length analysis for the AM peak hour shows acceptable queue lengths for all intersection movements into each gate. The results for the 2025 No-Action PM peak hour also show similar operations to the 2015 condition. All intersections are expected to operate at a LOS C or better except the intersection of George Mason and 6th Street (Intersection #7, Figure 22) which is expected to operate at a LOS F. The No-Action Alternative queue length analysis for the year 2025 shows acceptable queue lengths for intersection movements leading into each gate for the PM peak hour. However, the westbound movement (exiting) the southern gate is expected to have a queue length of approximately 650 feet on George Mason Drive.

The results of the operational analysis for the 2025 Proposed Action show that the study area intersections will operate similarly to the 2025 No-Action condition except for the intersection of George Mason and 6th Street (Intersection #7, Figure 22), which includes the southern access to campus at the eastern leg of the intersection. All movements from the minor approaches are expected to continue operating at a LOS F for both the AM and PM peak hours.

The Trip Generation analysis indicates that under the Proposed Action, approximately 65 vehicles would be added to George Mason Drive during the AM peak hour and approximately 50 vehicles would be added to George Mason Drive during the PM peak hour. That averages to approximately one vehicle per minute added to George Mason Drive during each peak hour. This would hold true for the 4th Street intersection as well.

The PM peak hour delay for the westbound movements (exiting vehicles) exceeds 999 seconds. The queue lengths at this location for the 2025 Proposed Action PM peak hour would be within the acceptable range, except for the westbound movement out of the South Gate onto George Mason Drive. This queue length would exceed 1,200 feet, which would extend back to Parking Lot P2 on the east side of the main campus. The results of the 2025 No-Action operational analysis show that the

intersections studied will operate with similar LOS and slightly higher delays when compared to the existing, 2015 conditions. During the AM peak hour, all of the study intersections would continue to operate at a LOS C or better. The individual turning movements operating with a LOS E or LOS F in year 2015 would continue to operate at those service levels, albeit with slightly higher delays. The queue length analysis for the AM peak hour shows acceptable queue lengths for all intersection movements.

Overall, with implementation of new security measures, vehicle cues awaiting access onto campus would be reduced. Only students, staff, and faculty with previously obtained vehicle passes will be allowed access onto campus at the north and south entrances. There would be no delays resulting from guards taking payment for parking as all parking passes must be obtained in advance, thereby eliminating the need for payment at the gate. Trucks will only be allowed access at the north entrance (Arlington Boulevard). At the north entrance, a pullover spot and a turn-around will be provided for vehicle checks so the flow of vehicles into campus can be maintained. These changes would minimize the que of vehicles that may back onto the roadway network.

Based on the above past, present, and future projections, there is negligible difference between the 2025 No-Action and Proposed Action Alternatives (Table 10). From the 2004 “Existing Condition” to the 2025 condition, the AM and PM peak hour level of service remains at LOS F at the George Mason Drive/6th Street intersection, regardless of whether the No-Action or Proposed Action Alternative is in place. The remaining intersections evaluated would operate at nearly identical and acceptable levels of service (LOS B, C, or D) during the AM and PM peak hours for the No-Action or Proposed Action Alternative.

3.11 PARKING

3.11.1 Affected Environment

The Comprehensive Plan for the National Capital: Federal Elements (1977-1984, updated 2016)²¹ is the principal planning document adopted by NCPC for the planning of federal facilities. The Plan contains goals, objectives, and policies to direct and manage growth throughout the metropolitan area. Of particular relevance to the 2017 NFATC Master Plan Update and this EA are policies outlined within the Plan’s Transportation Element. The Transportation Element identifies parking ratios for federal facilities within the historic District of Columbia boundaries, including NFATC. For these facilities, the twenty to thirty year goal is to provide one parking space for every four employees (a 1:4 ratio).

Currently, 1,690 parking spaces are provided at NFATC, nearly all in paved surface parking lots surrounding the main Campus or in an overflow lot on the West Parcel. Of those, 22 are reserved spaces and 46 are disabled spaces, leaving approximately 1,622 spaces for general parking. In addition, 20 motorcycle parking spaces are provided, which are dispersed throughout the main campus parking lots (Figure 23). In 2015, the average daily campus population was 3,165 students, faculty, and staff. This equates to a parking ratio of approximately 1:2, meaning one parking space per two vehicles.

²¹ National Capital Planning Commission. *Comprehensive Plan for the National Capital*. The updated Federal Elements of the Comprehensive Plan became effective April 5, 2016. NCPC website accessed on 11/22/16 at https://www.ncpc.gov/compplan/docs/06_CP_2016_Transportation_Element_2.29.16.pdf.

Figure 23: Current NFATC Parking



NFATC requires parking permits to park at the main campus. Daily, monthly, and yearly passes are available. Daily passes cost \$5 in the morning, from 7:00-11:00 AM, at the North and South Gate entrances. Bi-weekly, monthly, and annual passes are available for \$15, \$25, and \$130, respectively. A free, 121-space overflow lot is provided on the West Parcel. From there, individuals can access the campus using the pedestrian underpass or by walking to the gate on the south side of the main campus. From 7:00 AM to 11:00 AM, a guard is posted to prevent non-NFATC staff/students from parking there; suitable identification must be shown to gain access. There is no off-site, private parking facility available near the campus.

On any given week, there are about 1,800 parking passes issued for FSI. This number includes annual, monthly, bi-weekly, and daily pass holders. While this number exceeds available parking spaces, it generally works due to employees' schedules, travel, absences, illness, etc. The average number of student and staff parkers on a typical day is about 1,484 or 90 percent of the 1,649 available parking

spots. This number, however, does not include the approximate 200 non-parking pass, non-student visitors to campus.

Peak parking flow generally occurs at the September and March student intakes and during summer transfer months when 100% of the parking spots are filled. Also, longer term students assigned to training in preparation of their overseas Embassy postings are restricted from taking leave during training except during some holiday periods. Many FSI on-site staff take leave during holiday weeks, so the lower population periods are the week(s) of Christmas/New Year's and during August when most Foreign Service and their family members have departed for their posts and those newly arriving from their posts focus on getting children settled in new schools.

During the public scoping process, several residents expressed concern that individuals on campus were parking in adjacent neighborhoods; either for more convenient access, to avoid the parking fee, or because space was not available. In light of the availability, low cost, and proximity of parking spaces on campus, it is unlikely that individuals at NFATC are parking in residential areas. However, to deter such renegade parking, several streets within the Barcroft neighborhood require residential parking permits.

3.11.2 Significance of Effects

No additional parking spaces will be provided for the No-Action Alternative with the number of available parking spaces remaining at the current level of 1,690, plus 22 reserved spaces, 46 disabled spaces, and 20 motorcycle spaces. By 2025, under the No-Action Alternative, the average daily on-campus population is projected to be approximately 3,359 people. The parking ratio would remain at approximately 1:2. Because the campus would not have adequate facilities to meet FSI's training demands, approximately 450 individuals would receive or provide off-campus training in the DOS-acquired space in Rosslyn, Virginia.

Under the Proposed Action, the number of available parking spaces would remain at 1,690. Construction of additional buildings and expanded training facilities allows for the consolidation of training on one campus and would provide space to accommodate the additional 450 individuals' on-campus by 2025. The average daily on-campus population would be approximately 3,809, increasing the parking ratio to almost 1:3, which is the 10-year parking ratio goal under the Proposed Action. While this parking ratio would be an improvement over the No-Action Alternative, the long-term (20-year) NFATC parking ratio goal is 1:4.

Traditionally, growth in daily on-campus population would mean an equal increase in the number of vehicles on campus. However, in accordance with the NCPC's Comprehensive Plan - Transportation Element and with NFATC's updated TMP, FSI will be actively promoting the use of alternative transportation modes for travel to and from campus. The TMP prepared for the 2017 Master Plan Update provides comprehensive strategies for achieving NCPC's twenty to thirty year 1:4 parking ratio goal, including transit use incentives, promotion of active commuting (walking and cycling), and parking management options. The successful implementation of these strategies is intended to reduce the use of single-occupant vehicle trips generated at NFATC via parking management and the promotion of transit, walking, and biking-based transportation systems.

To meet NCPC's ultimate parking ratio goal of 1:4 in twenty years, FSI will further emphasize and encourage alternative means of transportation to the NFATC campus. Strategies presented in the updated NFATC TMP provide numerous options to reduce the use of single-occupant vehicles and

increase the use of alternative transportation modes. FSI has seen the single-occupant vehicle rate stabilize over recent years and will continue working towards reducing the rate through ongoing promotion of other transportation options, telework, and technology advancements in distance learning.

GSA recommends that a facility revisit its TMP and gauge its success every two years. FSI will follow this recommendation and survey its population and review the results bi-annually. During these reviews, if any of the TDM limitations were to be relaxed, such as the Department of State's faculty and staff shuttle prohibition for the purposes of commuting to work, NFATC will revisit these strategies to see if they are likely to be reasonable and effective given the nature and understanding of commuting to this location.

FSI has long been committed to being a good neighbor to surrounding communities by attempting to prevent/reduce staff and students from parking on surface streets and in residential neighborhoods. Through the promotion of subsidized public transit programs, Department of State shuttle buses, student housing contracts that include provisions for buses to bring transiting students to the campus, carpool matching, bicycle and motor bike covered parking, and on-site parking, FSI is diligent in its efforts to minimize the possibility that the FSI staff or students will park on adjacent surface streets. Enrolled students receive multiple communications about transportation options prior to their arrival on campus. These communications are sent at intervals that allow ample planning time to take advantage of transit subsidy programs, rideshare programs, etc. Once enrolled, students receive an email from the registrar outlining all the information necessary to begin classes, including specific text on the closest Metro stations, WMATA bus stops, and DOS Shuttle stops. This email is repeated approximately two weeks before classes begin and a couple of days before classes begin. The same information is included in the orientation packet distributed to incoming students and the official orientation video. All communications connect students to various web resources for additional details.

3.12 ALTERNATIVE MODES OF TRANSPORTATION

Alternative modes of transportation include public transit services (Metrobus and Metrorail), active transportation (walking, bicycling), and on-campus services (DOS shuttles, apartment/lodging shuttles for students, ridesharing programs, and active transportation amenities). The TDM Report in the 2017 Master Plan Update provides detailed descriptions of these services.

3.12.1 Affected Environment

3.12.1.1 Public Transit

The public transportation system in the vicinity of the site consists of Metrobus and Metro rail service providing service for persons requiring access to/from the NFATC. DOS full-time employees at the NFATC are eligible for Metrocheks, which may be purchased off-site at the State Department Offices in Rosslyn, Virginia.

The Ballston Station, located on the Washington, D.C. Metro's Orange and Silver lines, is 1.5 miles from the NFATC. Ballston Station is located next to the Ballston Common Mall and is the nearest station to the NFATC. The State Department shuttle makes stops throughout the day at the Rosslyn Metro Station (located on the Orange, Silver, and Blue lines) and transports State Department employees to both the NFATC and the main State Department building in Washington, D.C. This shuttle is used for official

business travel only and is dominated by individuals attending training. Regular commuter trips may not use the shuttle service; such trips may be accommodated through public transit.

Several bus lines provide connecting service between the NFATC and Metro Rail Stations. Bus stops are located near NFATC, on Arlington Boulevard (North Gate entrance), George Mason Drive (South Gate entrance), and Glebe Road.

3.12.1.2 Bicycle and Pedestrian Facilities

Marked bicycle and pedestrian paths are provided in abundance in Arlington County and the NFATC. These paths provide connectivity with other designated routes throughout the county. Capital Bikeshare has a station outside the North Gate entrance to the main campus. A second station is set to be built outside the South Gate entrance.

As was previously shown in Figure 13, Arlington County is one of the most walkable counties in the country, with a designated walking network of sidewalks and pedestrian crossing buttons and signs at intersections. Sidewalks are adjacent to both Arlington Boulevard North Gate entrance and George Mason South Gate entrance.

Marked bicycle and pedestrian paths are provided in abundance in Arlington County and also on the NFATC campus. These paths provide connectivity with other designated routes throughout the county. On the site, the parking lots and buildings are connected by paved sidewalks. Enclosed pedestrian bridges link the classroom buildings to provide students and staff sheltered access between these buildings. For those students and staff who bike to work, FSI provides bicycle racks. There are 80 spaces for bicycle parking throughout the campus. Shower facilities and lockers are available for free in the gym for all students and staff.

3.12.1.3 On-Campus Transportation Services

NFATC has been proactive with respect to traffic management and has a number of existing TDM strategies already in place. NFATC's TDM strategies and services include:

- An Employee Transportation Coordinator (ETC) who monitors and manages parking program and implements NFATC TDM strategies;
- NFATC website and transportation options packet;
- DOS shuttles;
- Private shuttles from DOS-leased apartments to and from campus for students;
- Managed parking;
- Rideshare matching; and
- Bike Racks and shower facilities for active commuters.

3.12.2 Significance of Effects

Commuters to the NFATC are fundamentally different than those destined to other nearby federal facilities such as the National Guard Bureau. As an educational training facility, numerous classes are held throughout the day, covering a broad range of topics and languages. As such, arriving and departing students and faculty do not typically occur at the standard 8:00 AM to 5:00 PM peak hour periods for all on campus. In addition, students in DOS-provided housing have access to free DOS-provided shuttle services during their training. Based on FSI surveys of on-campus commuting

preferences, NFATC students prefer to use DOS-provided shuttles, public transit, and “active transportation” modes to access the facility rather than private automobiles.

Using a worst-case scenario, there would be a 20% increase in vehicle trips resulting from the projected increase in on-campus population by year 2025. This 20% increase was used solely to identify necessary improvements to meet this worst-case increase in transportation demand. Assuming the proposed Transportation Management Plan is effectively promoted by FSI and DOS, the actual transportation impact from an increased on-campus population would create much less transportation demand than the worst-case scenario. The basis for this is as follows:

- The estimated daily onsite population is projected to increase from 3,165 individuals in 2015 to 3,541 individuals in 2021, a difference of 376 individuals or <12% increase.
- The staffing at the NFATC is projected to remain fairly constant; the on-campus population increase almost entirely will be students.
- Students predominately use DOS-provided shuttles, public transit, and active transportation modes to travel to NFATC: approximately 64% of students commute using modes that do not involve any additional private vehicles (or for hire vehicles) coming to the NFATC.
- The 2016 commuter survey of NFATC staff and students revealed arriving students are far less likely to arrive by private vehicle or carpool: 26.7% drive alone, 7.3% carpool, and an additional 2.2% are dropped off or take a taxi/shared ride service.
- Before even considering any new or expanded vehicle trip reduction activities at the NFATC, the baseline demand for new vehicle trips is low. A rough estimate of the additional vehicle trips would be $376_{\text{individuals}} \times (26.7\% + 2.2\%)_{\text{drive alone and dropped off}} + (376_{\text{individuals}} \times 7.3\% / 2_{\text{people/vehicle}})_{\text{carpool}} = 109 + 28 =$ a worst case of 137 round trips/day in 2021, spread across two entrances at the NFATC. Even if all these vehicle traveled in the peak hours, this represents fewer than 3 additional vehicles per minute over current conditions.
- Many students attending classes at NFATC stay in DOS-contracted housing. DOS makes it a matter of standard practice that all NFATC housing contracts include shuttle services, minimizing the need for students to drive to the facility.
- Free DOS shuttles provide frequent service directly to the Rosslyn Metro Station throughout the day. This further reduces the need for students to walk to local transit stops and encourages the use of public transit.
- Ongoing improvements to the reliability of the region’s transit system further increases the attractiveness of Metro as a commuting option. Completion of the Silver Line to Dulles Airport will better accommodate some travelers to the NFATC.
- Finally, distance learning programs provided by NFATC eliminate the need for students to travel to campus for their coursework.

The Transportation Management Plan (TMP) provides a number of vehicle trip reduction measures that the on-site transportation coordinator can investigate and adopt while seeking to achieve GSA’s vehicle trip reduction goals.

- Maintain and affirm the recommended TDM strategies that will allow the employee-parking ratio to meet the NCPC goal of 1 parking space per 3 employees (i.e., 1:3 ratio) for the 10-year horizon and a 1:4 ratio for the 20-year horizon. This will be accomplished indirectly by establishing mode share goals that seek to reduce the ratio of vehicle trips per population.

- Continue to promote the reduction of SOV trips to meet Arlington County's TDM goal of reducing peak hour work travel.
- Continue to be supportive of available transportation options that meet the needs of the student population.
- Maximize the use of public transit, carpooling, and active transportation for work commuting trips to manage traffic and parking requirements at the NFATC.

The TMP sets a goal for DOS to survey the on-site NFATC population at least every two years to gauge progress towards meeting vehicle trip reduction goals on campus. Regularly conducting these surveys will provide an opportunity to identify the services and programs that resonate with commuters to the NFATC and to optimize the effectiveness of overall trip reduction efforts. Finally, making the campus more secure will limit access for staff and students to the two main gates (Arlington Boulevard and George Mason Street at 6th Street). This will make off-campus parking inconvenient and less attractive.

According to The Transportation Element of the NCP's Comprehensive Plan, federal agencies should use a TMP to document an employer's active program to foster more efficient employee commuting patterns. The plan should include specific strategies to encourage change in employee travel modes, trip timing, frequency and length, and travel routes so as to reduce traffic congestion and improve air quality. Alternative transportation strategies and goals presented in the updated NFATC TMP will be used in the future, regardless of whether the No-Action Alternative or the Proposed Action is implemented.

3.13 CUMULATIVE EFFECTS

CEQ regulations require federal agencies to assess the cumulative effects of federal projects during the decision making process. Cumulative effects are defined as: "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonable foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions" (40 CFR 1508.7).

In other words, would the proposed federal project add to or interact with the environmental impacts of past, present, or future projects, regardless of the agency or group implementing those actions? This section of the EA provides a description of the cumulative impacts that the proposed action, combined with other projects in the area, may have on the human environment.

3.13.1 Past and Present Actions

Prehistoric Native American sites are located within Arlington County, primarily adjacent to the Potomac River. The earliest record of their presence is estimated to be 13,500 years ago. Native Americans continued to be the sole occupants of the area until the arrival of Europeans in the early 1600's. By the mid-1700's, European settlers dominated the Arlington area, with agriculture being the primary occupation and business²². Ultimately, following establishment of Washington D.C. as the Capital of the U.S., the Arlington area became closely tied to Federal activities and services nearby. The extension of

²² Arlington Historical Society. *The History of Arlington County*. Accessed on 12/07/16 at: <http://www.arlingtonhistoricalsociety.org/learn/history-of-arlington-county/>. The website notes the following source for the information presented: Historic Arlington, ©2001, by the Arlington County Bicentennial Task Force and the County's Historical Affairs and Landmark Review Board, rev.ed. *Historic Arlington, 1608-1932* by Ludwell Lee Montague. Arlington County Historical Committee, 1968.

trolley lines and the Washington and Old Dominion Railway into the County from Alexandria and Washington made possible the development of such commuter villages as Lyon Park, Clarendon, Ballston, Cherrydale, Bon Air, Glencarlyn, and Barcroft.²³ The advent of the automobile and World War II brought increased growth and development, reshaping the county from largely agricultural to suburban, in support of Federal government activities.²⁴ The area surrounding the NFATC campus is primarily residential with supporting community services and facilities such as churches, schools, and parks.

The NFATC site was originally developed as Arlington [Hall] Junior College between 1924 and 1942. It was the first exclusive women-only school of higher education in the region and the only one developed as a college campus. During World War II, the U.S. Army purchased and occupied Arlington Hall, subsequently renamed Arlington Hall Station, to conduct secret military intelligence operations. From 1942 to 1988, the NFATC site was a military base with housing, training, and service buildings built on campus. In 1989, the Department of Defense transferred the site to the DOS for development of the NFATC campus; one of the Foreign Service Institute's training facilities for members of the U.S. foreign affairs community. Since then, all World War II-era buildings have been demolished and the site now functions as a teaching and training facility in a tree-covered, campus-like setting, primarily surrounded by long-established, suburban, single-family residential neighborhoods.

3.13.2 Reasonably Foreseeable Actions

Reasonably foreseeable actions were determined to be those actions contained in an approved planning document at the local, state, or federal level. The Traffic Study (Appendix D) is based on planned and approved transportation improvements through year 2025. Traffic projections under the No-Action Alternative and the Proposed Action are based on projected population growth on the NFATC campus, as well as the annual 3% growth anticipated by Arlington County through year 2025. The cumulative results of the traffic projections show little difference between the No-Action Alternative and the Proposed Action by year 2025.

Under the No-Action Alternative or the Proposed Action, land use on the NFATC campus will remain the same; the campus will continue to function as a training facility for the FSI community. In addition, the Arlington County Comprehensive Plan does not show a planned change in land use in the areas adjacent to the NFATC campus.

Under the Proposed Action, there will likely be little change to traffic volumes in the Rosslyn area when the 450 off-campus students, faculty, and staff are consolidated on the NFATC campus. While there may be a short-term drop in traffic volumes immediately following the consolidation, the vacated space in Rosslyn will likely be occupied by new tenants, refilling the traffic void.

3.13.3 Cumulative Effects

The original EA prepared for the National Foreign Affairs Training Center Master Plan was approved on September 9, 1988. The NCPC approved the original 1989 Master Plan for the National Foreign Affairs Training Center on March 8, 1989. A traffic analysis was conducted for the original EA and Master Plan. Both reported that existing traffic conditions at the 6th Street and George Mason Drive NFATC entrance (which was not signal controlled) resulted in the intersection operating at LOS E in the AM peak hour.

²³ Ibid. *Suburban Alexandria County*.

²⁴ Ibid. *Arlington County in Transition*.

Traffic conditions declined to LOS F during the evening peak period. The combined effect of the then future National Guard traffic, NFATC-related traffic, and unrelated background traffic on George Mason Drive was projected to result in LOS F for both the AM and PM peak hours for certain movements at the 6th Street and George Mason Drive intersection. However, with the installation of a traffic signal at this intersection, the intersection would operate at a LOS A. To help improve levels of service on the transportation network, both the DOS and the National Guard agreed to explore measures to reduce reliance on the private vehicle and to increase transit usage. From this came the establishment of a ridesharing program and a shuttle system serving DOS and DOD facilities to reduce the use of automobiles on campus. While warranted, no traffic signal and no left turn lane were installed at the George Mason/6th Street intersection by Arlington County, the authority responsible for such activities.

The 2005 EA/FONSI for the Master Plan Update again documented that a signalized intersection at George Mason Drive and 6th Street was warranted based on existing, 2004 conditions. At that time, the intersection continued operating at LOS F. The unsignalized analysis shows the left turn at George Mason Drive/6th St into the NFATC campus entrance continued operating at LOS F during the AM and PM peaks. Again, the projected increases in traffic volumes continued to substantiate the need for a signalized intersection and a left turn lane on George Mason Drive at the 6th Street entrance to the NFATC. While warranted, Arlington County did not install a traffic signal or left turn lane at the George Mason/6th Street intersection.²⁵

The traffic analysis conducted for the NFATC 2017 Master Plan Update and associated EA again document that a traffic signal and left turn lane are warranted at the George Mason/6th Street intersection. Arlington County staff agree that the projected 2025 traffic volumes at the South Gate entrance appear to meet the warrants for installation of a traffic signal at that location. In addition, the county stated that, because the recommended left-turn lane from southbound George Mason Drive into the NFATC campus at 6th Street would solely benefit the NFATC employees and students, the improvement should only be installed if DOS or GSA pays for it. However, as stated in the 1958 Department of the Army's easement for George Mason Drive to Arlington County, maintenance and improvements to that roadway are the responsibility of Arlington County and "shall be performed without cost or expense to the United States"²⁶

Under the Proposed Action, the construction of new buildings and expansion of existing facilities will result in an initial loss of vegetation, as well as a permanent increase in impervious surface area for each new or expanded building footprint. Vegetation impacts will be minimized by the addition of sustainable landscaping using native species and the use of green roofs for new buildings. Stormwater runoff from impervious surfaces will be minimized by implementing approved Stormwater Management Plan. The plan will include: campus-wide designs that promote the infiltration of rainfall for aquifer recharge; retaining and treating required amounts of water on site; using a mix of areas planted with native species and structured gabion areas for stormwater retention areas; and integrating existing topography and plantings to minimize ground disturbance.

²⁵ See Section 3.10, Traffic Volumes and Levels of Service, for a discussion of the George Mason Drive Easement and Arlington County's maintenance responsibilities.

²⁶ U.S. Department of the Army. Easement for Road or Street on Arlington Hall Station, Arlington, Virginia (DA 49-080 ENG-4368). July 15, 1958.

The Proposed Action will result in the closure of the jogging/bike trail, however, there are no other known projects that will hinder the walkability within the NFATC area and surrounding neighborhoods. Thus, the impact remains non-significant when analyzed with past, current, and future projects.

GSA and DOS have consulted with SHPO and determined that the Proposed Action has the potential to have an adverse effect on the Arlington Hall Station Historic District. The implementation of the signed PA will mitigate the adverse impact and will result in a non-significant impact individually and cumulatively. As described in Chapter 3 of this EA, GSA and DOS have evaluated each of these resources individually and cumulatively and determined there will not be an individually or cumulatively significant impact.

Beneficial cumulative impacts associated with past, current, and future development of the Proposed Action at the NFATC site include: increased short-term job opportunities during construction; continuing demand for short-term student housing while in training on campus; and continuing demand for goods and services within the community by students, faculty, and staff. In addition, consolidation of FSI's training programs will have the following cumulative beneficial effects:

- Campus consolidation would reduce FSI's administrative and support burdens associated with off and on-campus learning programs;
- Campus consolidation would eliminate the duplication of FSI personnel and services at the off-campus training location in Rosslyn; and
- Campus consolidation would meet a main FSI mission goal of having individuals from all agencies who are going to serve at Missions abroad housed in one training location. Doing this would allow students and their family members to learn together and form connections to one another before going to post.

Past, present, and future activities have affected and will continue to affect the natural, historic, and social environment at the NFATC and the adjacent communities. Chapter 3 of this EA individually evaluated natural, historic, and social issues relative to the No-Action and Proposed Action Alternatives. With the exception of historic resources, none of the issues evaluated would be impacted significantly from an individual or cumulative perspective. In addition, no significant, adverse cumulative impact is anticipated when considered in light of past, present, and reasonably foreseeable future actions.

Neither the No-Action Alternative nor the Proposed Action is anticipated to result in significant, adverse cumulative effects to the natural, historic, and social environment.

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