



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



APPENDIX B. PUBLIC OFFICIALS AND AGENCY COORDINATION AND COMMENTS

**Draft EA for NFATC 2017 Master Plan Update:
FEDERAL & STATE COMMENTS**

DONALD S. BEYER, JR.
8TH DISTRICT, VIRGINIA

COMMITTEE ON NATURAL RESOURCES

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January 13, 2017

Ms. Alexis Gray, NEPA Compliance Specialist
U.S. General Services Administration
National Capital Region
301 7th Street, SW, Room 4004
Washington, DC 20407

Dear Ms. Gray:

I write to comment on the Draft Environmental Assessment (Draft EA) for the National Foreign Affairs Training Center (NFATC) 2016 Master Plan Update, prepared by the U.S. General Services Administration (GSA). The NFATC is of great interest to me, as it is located in Virginia's 8th Congressional District, which I represent in the U.S. House of Representatives. I recognize and appreciate that the NFATC is the U.S. government's premiere foreign affairs training provider and a strategic enabler of diplomatic excellence. The State Department's substantial growth and policy requirements make the NFATC's expansion understandable and necessary.

The NAFTC's location, in the heart of Arlington County, makes it critical that the facility maintain a healthy partnership with the surrounding community. Therefore, I respectfully request consideration of the following points:

Pedestrian Trail

Currently, an easement is granted for the 3,055 foot-long paved pedestrian trail that runs along the southern edge of the NFATC's property, from S. Quincy Street southwestward past the Childcare Center, then west past the guard station at S. George Mason Drive. While I understand that with the proposed expansion would come new physical security requirements to mitigate increased risk, I am concerned that the proposal eliminates the general public's access to this trail. The Draft EA concludes that "the proposed action's impact on neighborhood connectivity would be minor," and that "this determination is based on the limited number of individuals using the NFATC's pedestrian trail."

Feedback I have received from the NFATC's neighbors suggests this assessment is inaccurate. There is concern that the Foreign Service Institute's (FSI) measurement to determine the path's usage may have been flawed. Specifically, the measurement tool was placed at the eastern trailhead when in fact many of the path's users access the trail from the dirt footpath adjacent to the trailhead. Had FSI placed the counter at a midpoint on the trail, their numbers would likely have increased and more accurately reflected use.

Additionally, the path serves as more than simply a recreational route. It provides connectivity through a superblock in Arlington and allows for a safe, traffic-free crossing of S. George Mason Drive. Students use the path to walk to and from school, and residents use it to stay off congested major thoroughfare roads when simply moving about the neighborhood. Supporting safe pedestrian friendly routes for all ages is a priority of Arlington County, the Alcova Heights neighborhood, and mine. Taking these factors into consideration, I encourage the GSA to revisit the determination that the proposed action's impact on neighborhood connectivity would be minor.

Traffic

The Draft EA's discussion of the traffic impacts of the NFATC also raises several concerns. The Draft EA concludes that all of the intersections around the facility now operate at an acceptable level, with the exception of George Mason and 6th Street. From discussions with the neighbors of the NFATC, however, I understand George Mason Drive is regularly backed up in the morning from Route 50 as far south as 8th Street.

Further, the Draft EA states that a 20 percent increase in personnel can be handled by alternative transportation modes—transit, walking, and bicycling—without having a significant impact. There is no evidence that this will be remotely successful, however. Public transit to the site is very limited. Additionally, lessons from the redevelopment of the Army National Guard Bureau facility adjacent to the NFATC demonstrate that an increase in population at the site may cause significantly more single-use automobile congestion. These considerations clearly indicate the need for further review of the traffic implications of the NFATC expansion before proceeding.

I appreciate GSA's willingness to engage in a discussion about these areas of concern. To be truly successful, the process will require give-and-take from and among the NFATC, GSA and the neighborhood. I offer my office's assistance facilitating these conversations. The proposed actions and Master Plan updating present an opportune time to engage with the community for long term visioning for the site that could also include constructing an east-west connector trail along the southern boundary of the NAFTC site and the issues mentioned above. Thank you for your time and attention to these important comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Darlene Begey".

DB/NS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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January 18, 2017

Ms. Alexis Gray
NEPA Compliance Specialist
Office of Planning and Design Quality
Public Buildings Service
National Capital Region
U.S. General Services Administration
301 7th Street, SW – Room 4004
Washington, DC 20407

Re: Draft Environmental Assessment for the National Foreign Affairs Training Center 2016 Master Plan Update

Dear Ms. Gray:

In accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act, and the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR 1500-1508), the U.S. Environmental Protection Agency (EPA) is providing comments on the Draft Environmental Assessment (EA) for the National Foreign Affairs Training Center (NFATC) 2016 Master Plan Update located at the former Arlington Hall Station in Arlington, Virginia.

The NFATC site comprises approximately 71 acres in Arlington County, VA and is comprised of two major parcels: an approximately 65-acre main academic campus and the approximately 7-acre West Parcel, used by the Foreign Service Institute (FSI) for satellite parking, and by Memorandum of Agreement (MOA) with Arlington County as a public park. The NFATC site is where the State Department maintains the property as an education and training center. The center serves as a major federal government education facility serving trainees in the Foreign Service and also as a professional training and conference center for Department of State (DOS) staff.

The proposed action calls for phased improvements to the 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 71-acre site. The main goals of the 2016 Master Plan Update are: construction of Building B (previously

approved in the 2005 EA), expansion of the Childcare Center, perimeter security enhancements that reflect updated requirements for federal facilities and infrastructure improvements. With the implementation of the Master Plan Update, the primary uses of the NFATC campus will remain unchanged. The proposed action is needed to plan sufficient training and support space for present and anticipated methods of instruction, increased training hours, and new program requirements. In addition, training would be consolidated and there would be sufficient facilities available for 450 individuals who are typically located at DOS-leased, temporary off-campus training space in Rosslyn, Virginia.

The Draft EA evaluated three Master Plan Alternatives (Alternatives 1, 2 and 3) along with the No-Action Alternative. However, only Alternative 1 (Preferred Alternative) and the No-Action Alternative were carried forward; Alternative 2 and Alternative 3 were eliminated.

EPA has included information for your consideration and inclusion in the Final EA which is provided in the Technical Comments document (enclosed). Thank you for the opportunity to review this project. EPA looks forward to receiving the Final EA. If you have questions regarding these comments, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765 or Delgrosso.karen@epa.gov.

Sincerely,



Barbara Rudnick
NEPA Team Leader
Office of Environmental Programs

Enclosure (1)

Technical Comments

Draft EA for the National Foreign Affairs Training Center 2016 Master Plan Update

Proposed Action

Page 9 states, “The only difference in daily, on-campus population projects 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 DOS-leased, temporary off-campus training space in Rosslyn, Virginia.” Page 10 states, “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.” As noted on page 9, under the action alternatives, 450 individuals from training space in Rosslyn, VA would be consolidated to the proposed updated NFATC facility by 2020. As noted on page 10, there is a reference to “other National Capital Region locations” from which to consolidate FSI classroom training facilities. Are there training facilities other than the space in Rosslyn, VA that will be consolidated to the NFATC facility? Can it be expected that consolidation from other National Capital Region locations would increase the number of individuals at the Arlington location by more than the projected 450 individuals? If so, the impacts to resources would be greater and should be addressed and evaluated in the Final EA.

Page 16 states, “Alternative 1 incorporates previously identified, smaller construction projects from earlier Master Plans and provides flexibility to accommodate growth as needed.” Please distinguish those projects that were previously identified from earlier Master Plans. It is assumed that these projects were evaluated in previous NEPA documentation and have been approved. Please identify these smaller construction projects and explain why they were not implemented prior to the current 2016 Master Plan Update. Again, please address future growth potential at the NFATC facility (2020 and beyond).

Environmental Laws and Regulations

Section 1.3 (page 6) lists relevant environmental laws and regulations that have been adhered to in the preparation of the Draft EA. The following executive orders should be added to the list and the Final EA should address how these have been adhered. They are: EO 13508 *Chesapeake Bay Protection and Restoration*, EO 12898 *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, EO 13045 *Protection of Children from Environmental Health Risks and Safety Risks*, EO 13175 *Consultation and Coordination with Indian Tribal Governments*, and EO 13693 *Planning for Federal Sustainability in the Next Decade*.

Vegetation and Stormwater Management

Page 22 within Table 6, NEPA Topics Eliminated from Detailed Evaluation, under “Vegetative Habitat” states, “Within limited areas, the Proposed Action will require the removal of existing vegetation and trees for building construction. The disturbance would be minimized as much as practicable during construction.” In addition, “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.” The EA should quantify and identify the trees that would be lost due to implementation of the Proposed Action. In addition, please discuss this vegetative loss and its contribution to increased impervious surface as well as mitigation for loss and necessary control measures to off-set the increase in stormwater runoff resulting from the Proposed Action. The Final EA should quantify the added impervious surface as a result of implementation of the Proposed Action.

EPA appreciates that the proposed action will be implemented in compliance with Section 438 of the Energy Independence and Security Act (EISA) of 2007(page 22). If possible, please specify mitigation/control measures to be used in the area of the tree removal. As you are aware, the intent of Section 438 of the EISA is to require federal agencies to develop and redevelop applicable facilities in a manner than maintains or restores stormwater runoff to the maximum extent technically feasible. Implementation of Section 438 of the EISA can be achieved through the use of the green infrastructure/low impact development (GI/LID) infrastructure tools described in the Technical Guidance. The Draft EA did not discuss green infrastructure (GI) or low impact development (LID) practices. To learn more information on specific GI/LID practices and how they function, visit: www.epa.gov/greeninfrastructure and www.epa.gov/nps.lid.

Coastal Zone Management

It is noted on page 22 that Coastal Zone Management is a NEPA topic eliminated from detailed evaluation. Please be sure to document that the Virginia Department of Environmental Quality, Coastal Zone Management (CZM) Program has been offered the opportunity to assess the Proposed Action to determine that the federal action is consistent with the state’s CZM Program’s laws and enforceable policies. The CZM Program approval should be sought and documented in the Final EA.

Climate Change

Page 23 of the Table 6, NEPA Topics Eliminated from Detailed Evaluation, lists Climate Change as a topic to be eliminated. It is noted that construction and operation of new, expanded, and existing facilities at NFATC will be conducted in accordance with EO 13693, *Planning for Federal Sustainability in the Next Decade*. In addition, the table states, “The Proposed Action will implement sustainable building design and transportation strategies to address the challenges of climate change and advance projects that minimize fossil fuel consumption and reduce greenhouse gas (GHG) emissions.” However, it is recommended that the NEPA analysis address the appropriateness of considering changes to the design of the proposal to incorporate GHG reduction measures and resilience to foreseeable climate change. The Draft EA eliminated GHG/Sustainability from detailed evaluation stating that “The Proposed Action will be implemented in accordance with the requirement of EO 13693...” However, the Proposed Action should consider future climate scenarios and weather events from the National Climate Assessment (NCA), and describe how those scenarios may impact the project and its design. Any assessment done to identify climate trends and sustainable design should be mentioned in the NEPA analysis and design or construction commitments brought into a final document. We

recommend considering climate adaptation measures based on how future climate scenarios may impact the project. The U.S. Global Change Resource Program released the Third National Climate Assessment, the authoritative and comprehensive report on climate change and its impacts in the United States. For more information, please visit <http://www.globalchange.gov>.

Chesapeake Bay Protection and Restoration, EO 13508

Because the NFATC facility is within the Chesapeake Bay watershed, the Final EA should address EO 13508 as it relates to the Proposed Action. Adherence to goals and strategy for protecting and restoring the Chesapeake Bay should be discussed.

Cultural Resources

The NFATC is zoned as S-3A (or Special District) which means that there is a building height limit not to exceed 45 feet. However, under Alternative 1 (Preferred Alternative), Building 8 is proposed as a 5-story building with an approximate height between 53 and 70 feet. Thus, a special use permit is required from Arlington County. The Draft EA did not discuss visual impacts to neighboring communities from the perspective of the proposed Building 8. It should be evaluated if the neighboring communities Environmental Justice communities. Please discuss impacted view shed and who would be affected. An image and discussion of the proposed building in context with impacted communities/resources [in particular, the Arlington Hall Station Historic District and the adjacent residential historic districts (Barcroft and Alcova Heights)] should be provided in the Final EA.

Page 35 states, “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.” Depressing at least one floor of the building helps to reduce the visual mass and size of Building B relative to the Arlington Hall Station Historic District and the adjacent historic districts.” Please discuss in terms of height (quantify). Since the designation of Special District limits building height to 45 feet., what does the depression of at least one floor equate to? Has there been any visual context studies completed to have a more realistic understanding of the viewshed impact of Building B on the community and resources?

Environmental Justice

The Environmental Justice discussion of the Draft EA does not provide a clear representation of minority census blocks in the area of the NFATC. The Draft EA states, “As shown in Table 7, minority populations within the NFATC campus block group, while not exceeding the 50% threshold, are meaningfully greater than the general Arlington County population by 11%.” The minority census block groups should be identified and depicted on a map and put in relation to the Proposed Action.

Page 30 states that the public was invited to attend a public scoping meeting on the project. The text states, “Over 200 postcard invitations were sent to adjacent homeowners and homeowner/condominium associates; public notices were posted in local and national

newspapers; and a public scoping meeting announcement was posted on GSA's project website." Outreach efforts should be recorded in the EA (for instance, if postcards were sent to all minority census block groups). It is important to use local businesses, libraries and churches to ensure reaching all impacted parties.



COMMONWEALTH of VIRGINIA

Department of Historic Resources

Molly Joseph Ward
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January 25, 2017

Nancy Witherell
Regional Historic Preservation Officer
U.S. General Services Administration
National Capital Region
Attention: Ms. Alexis Gray, Project Manager
301 7th Street, SW, Room 4004
Washington, D.C. 20407

Re: Environmental Assessment
George P. Shultz National Foreign Affairs Security Training Center (NFATC) Master Plan Update
Arlington, Virginia
DHR File No. 2016-0732

Dear Ms. Witherell:

Thank you for your letter of December 13, 2016 providing the Department of Historic Resources with a revised Area of Potential Effects (APE) and determination of effects. We also appreciate receiving the supporting documentation on January 11, 2017, including the *Revision of the Area of Potential Effects and Determination of Effects (APE Revision)*. I regret to inform you that we cannot agree that a determination of effects is possible at this time.

In the preliminary assessment, GSA applied the Criteria of Adverse Effects to the 2016 NFATC Master Plan Update, per 36 CFR 800.5(a)(1), and then determined that the various components of the Proposed Action are compatible with the architecture of contributing historic features in the Arlington Hall Station Historic District, and if implemented, would have no adverse effect on the overall character of the setting and views within the historic district. In the subsequent *APE Revision*, GSA determined that there would be no adverse effect to Arlington Hall Station Historic District, Barcroft Historic District or Alcova Heights Historic District. Based upon a review of all information provided, we do not concur that the proposed project will not adversely affect historic resources. It is the opinion of DHR that GSA has not submitted sufficient information to make a final effect recommendation or determine the APE.

A programmatic agreement may be used when effects on historic properties cannot be fully determined prior to approval of an undertaking and we agreed with Gary Porter of the General Services Administration (GSA) on September 27, 2016 that a programmatic agreement is appropriate here. As stated in Section 3.8.2 of the Environmental Assessment, Archeological Resources, *Because construction of the various buildings and*

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improvements under the Proposed Action would be phased over time, a Programmatic Agreement between GSA, DOS, FSI, and other consulting parties is currently being developed. The Programmatic Agreement will establish the protocol for continuing the Section 106 process as construction plans for the Proposed Action advances.

Description of APE. As you know, in 1988, the Arlington Hall Station Historic District (DHR ID #000-0018) was determined eligible by the Keeper of the National Register for listing in the National Register of Historic Places (NRHP). In a Determination of Eligibility Notification dated 10/7/88, Arlington Hall Station was determined eligible as a historic district for its local architectural and educational importance and for its nationally significant role in American military intelligence operations during World War II. Contributing features included all buildings, structures and landscape features constructed before 1946, including all temporary, semi-permanent and permanent World War II buildings. The boundary includes the entire 86.5 acre parcel as shown on the 1963 general Site Map. The two periods of significance are: from 1924 to 1942 as the Arlington Junior College because it was the first girls school of higher education in the region and the only one developed as a college campus; and from 1942 to 1946 as the home of the United States Signal Intelligence Service during World War II.

On July 21, 2015, Michael Baker sent a letter to DHR on behalf of the General Services Administration (GSA) regarding the Master Planning Process and proposed reducing the boundary of the district due to significant loss of integrity (DHR File No. 2015-0667). The proposed boundary was drawn to include the four remaining pre-1946 buildings (Buildings: D-Gymnasium, E-Old Main Building H-Cottage 50, and I-Cottage 51) and related landscape features, while excluding late 20th and 21st century buildings and surface parking areas. On August 6, 2015 DHR responded to GSA.

Redrawing boundaries for an eligible district is not appropriate prior to initiation of Section 106. Furthermore, the information provided for our concurrence of a reduction in boundaries for this NRHP-eligible site is insufficient. Has survey been conducted of the site to justify the boundary reduction? A field view and review of archival materials is not sufficient. The information provided by your consultant Michael Baker International is very brief, and seems to imply that a larger project will occur at this site.

Based upon a review of the information provided, we do not concur at this time that the boundaries for NRHP-eligible Arlington Hall Historic District should be reduced. We recommend initiating Section 106 [including a project review application to our office], identifying consulting parties, delineating an Area of Potential Effects (APE) with justification, and then move on to identification of historic properties where the boundaries of the Arlington Hall Historic District are best addressed through cultural resources survey. At this time, we prefer to refrain from commenting on archaeology until Section 106 is initiated and an undertaking is described.

The last communication regarding the boundary reduction was sent as a response from GSA's Gary Porter on August 20, 2015, informing DHR that he would coordinate with the Department of State on the 106 initiation process regarding this.

DHR recommends a cultural resources survey for the Arlington Hall Historic District. The demolition of the Operations B building (a contributing resource to the historic district), which occurred between 1988 and 1991, and the transfer of the accompanying property to the National Guard Bureau, should be reflected in a revised historic district boundary. GSA should continue to pursue the boundary reduction as part of the current Section 106 consultation.

In our opinion a viewshed analysis will be needed to determine the APE for visual effects. Neither the Massing Plan, nor other justifications presented in the EA, or *APE Revision*, is sufficient in place of a viewshed analysis. Before the APE can be determined with certainty, a thorough viewshed study will need to be conducted. We encourage you to consider DHR's *Assessing Visual Effects on Historic Properties* (2010) which gives guidance on establishing a viewshed and viewshed study methodology. This is available on our website at http://www.dhr.virginia.gov/pdf_files/Assessing_Visual_Effects_JUN10.pdf.

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One popular method is to conduct a “red balloon test,” which consists of raising a highly-visible helium-filled balloon on a tether to the height of the proposed facility and driving around the area to determine from where the balloon can be seen. Those areas from which the balloon can be seen are considered the viewshed. Another more advanced method of determining viewshed involves the use of geographical information systems (GIS), where based upon topography, relative elevation, and vegetative cover, a virtual viewshed is constructed. In using GIS modeling, field verification may be necessary to refine the viewshed.

The following viewshed studies are necessary to determine effects on historic resources:

1. Barcroft Historic District: While it is clear that a portion of the Barcroft Historic District will not be visually impacted due to the National Guard complex blocking the view to NFATC, a viewshed analysis is needed for the portions that are not blocked by the National Guard complex.
2. Alcova Heights Historic District

The Barcroft Historic District was determined eligible by the DHR Evaluation Committee in 2001 as locally significant under Criteria A (Community Planning/Development) and C (Architecture). The EA should clearly state, as implied in your December 13, 2016 letter, that GSA will consider the Alcova Heights neighborhood as NRHP-eligible for the purposes of this undertaking.

The *Draft EA* also notes vegetative screening as one of the reasons the new building's visual intrusion will not negatively impact historic resources. It is not stated what kind of vegetative screening will be used and if it will be affected by the season, such as would be the case with deciduous plants. Please provide the type(s) of plants that will be used for the aforementioned screening and consider seasonal visibility in your viewshed study.

Furthermore, neither the *Draft EA* nor the *APE Revision*, make clear if the historic meadow and pond bridges retain enough integrity to be significant or if they will be retained or altered. This should be specified.

Lastly, it should be noted that one reason that the Arlington Hall Station Historic District is NRHP-eligible is for its early 20th-century Colonial Revival style institutional architecture. Therefore, the design details of the proposed new buildings should be contemporary and compatible. DHR will need to review the design details (i.e. elevations, renderings, sections and spec sheets) in order to concur with GSA's final effect recommendation, unless a decision is made to include this review in the programmatic agreement.

Identification of Consulting Parties and Scope of Public Involvement. We appreciate your notification of the Delaware Nation, the Delaware Tribe of Indians, the Catawba Nation and the Pamunkey Tribe as well as sharing the response of the Catawba Nation and the Pamunkey Tribe with DHR.

If you have any questions concerning our comments, or if we may provide any further assistance, please do not hesitate to contact me (for archaeology) at (804)482-6088; e-mail ethel.eaton@dhr.virginia.gov, or and Adrienne Birge-Wilson at (804) 482-6092;e-mail adrienne.birge-wilson@dhr.virginia.gov (for architectural issues).

Sincerely,



Ethel R. Eaton, Ph.D., Senior Policy Analyst
Review and Compliance Division

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February 7, 2017

Alexis Gray
NEPA Compliance Specialist
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National Capital Region
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Suite 4004
Washington, DC 20407

RE: Comments on the Draft Environmental Assessment and Federal Consistency Determination for the National Foreign Affairs Training Center 2016 Master Plan Update proposed by the U.S. General Services Administration, Arlington County (DEQ 16-238F).

Dear Ms. Gray:

The Commonwealth of Virginia has completed its review of the above-referenced documents. The Department of Environmental Quality (DEQ) is responsible for coordinating Virginia's review of federal environmental documents submitted under the National Environmental Policy Act (NEPA) and responding to appropriate federal officials on behalf of the Commonwealth. DEQ is also responsible for coordinating Virginia's review of federal consistency documents submitted pursuant to the Coastal Zone Management Act (CZMA) and providing the state's response. This is in response to the Draft Environmental Assessment (EA) and the Federal Consistency Determination (FCD), received December 13, 2016, for the above referenced project. The following agencies participated in the review of this proposal:

Department of Environmental Quality
Department of Conservation and Recreation (DCR)
Department of Health (VDH)
Department of Transportation (VDOT)

In addition, the Department of Historic Resources (DHR), Department of Game and Inland Fisheries (DGIF), Marine Resources Commission, the Northern Virginia Regional Commission, and Arlington County were invited to comment on the proposal.

PROJECT DESCRIPTION

The U.S. General Services Administration (GSA) proposes to implement the George P. Shultz National Foreign Affairs Training Center (NFATC) 2016 Master Plan Update and associated phased improvements. The NFATC, located at 4000 Arlington Boulevard in Arlington County, is a 71-acre site maintained by the State Department as a major governmental training and educational center. The proposed action will result in phased improvements to the facility to accommodate the evolving training mission, as well as expansion of the campus facilities. Three Build Alternatives were considered, with Build Alternative 1 being carried forward. Improvements under Build Alternative 1 will include modifications to and expansions of existing facilities as well as construction of new buildings. The NFATC in its current state has 623,547 gross square feet (gsf) of space and is proposed to increase to 934,309 gsf as a result of project implementation. The main goals of the update are the construction of Building B (a new training center), expansion of the Childcare Center, and perimeter security enhancements that reflect updated requirements for federal facilities. Other additions included in the proposal are a new visitor center, an addition to the Chiller Plant, a new training wing addition north of Building F, and an addition to Building K. All changes will occur within the property.

ENVIRONMENTAL IMPACTS AND MITIGATION

1. Water Quality and Wetlands. The EA (pages 22-23) states that there are no wetlands or surface waters located on the NFATC site. An unnamed tributary to Doctors Run runs along the southwestern boundary of the main campus and Doctors Run, a perennial stream, runs parallel to and outside of the property boundary. These waterbodies will not be directly impacted by the proposed action.

1(a) Agency Jurisdiction. The State Water Control Board promulgates Virginia's water regulations covering a variety of permits to include the Virginia Pollutant Discharge Elimination System Permit (VPDES) regulating point source discharges to surface waters, Virginia Pollution Abatement Permit regulating sewage sludge, storage and land application of biosolids, industrial wastes (sludge and wastewater), municipal wastewater, and animal wastes, the Surface and Groundwater Withdrawal Permit, and the Virginia Water Protection (VWP) Permit regulating impacts to streams, wetlands, and other surface waters. The VWP permit is a state permit which governs wetlands, surface water, and surface water withdrawals and impoundments. It also serves as §401 certification of the federal Clean Water Act §404 permits for dredge and fill activities in waters of the U.S. The VWP Permit Program is under the Office of Wetlands and Stream Protection, within the DEQ Division of Water Permitting. In addition to central office staff that review and issue VWP permits for transportation and water withdrawal projects, the six DEQ regional offices perform permit application

reviews and issue permits for the covered activities:

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

1(b) Agency Findings. The DEQ Northern Regional Office (NRO) did not indicate that wetlands or surface waters would be impacted by the project.

1(c) Recommendation. Impacts to wetlands and surface waters should be avoided and minimized to the maximum extent practicable. Consider utilizing permeable pavement for parking areas and walkways, where practicable. Denuded areas should be promptly re-vegetated following construction.

1(d) Conclusion. As designed, the project is consistent with the wetlands management enforceable policy of the Virginia Coastal Zone Management (CZM) Program.

2. Non-Point Source Pollution Control. The EA (page 23) states that during construction all state and local erosion and sediment control requirements will be adhered to. Post-construction, disturbed areas will be landscaped with appropriate vegetation.

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

- Virginia Erosion and Sediment Control (ECS) Law (§ 62.1-44.15:51 *et seq.*) and Regulations (9VAC25-840) (*VESCL&R*);
- Virginia Stormwater Management Act (§ 62.1-44.15:24 *et seq.*) (*VSWML*);
- Virginia Stormwater Management Program (VSMP) regulation (9VAC25-870) (*VSWMR*); and
- 2014 General Virginia Pollutant Discharge Elimination System (VPDES) Permit for Discharges of Stormwater from Construction Activities (9VAC25-880).

In addition, DEQ is responsible for the Virginia Stormwater Management Program (VSMP) General Permit for Stormwater Discharges from Construction Activities related to Municipal Separate Storm Sewer Systems (MS4s) and construction activities for the control of stormwater discharges from MS4s and land disturbing activities under the Virginia Stormwater Management Program (9VAC25-890-40).

2(b) Requirements. The DEQ Office of Stormwater Management did not comment on the proposed project. Regulatory guidance on stormwater management and erosion and sediment controls is provided below.

2(b)(i) Erosion and Sediment Control and Stormwater Management Plans.
GSA and its authorized agents conducting regulated land-disturbing activities on private

and public lands in the state must comply with the Virginia Erosion and Sediment Control Laws and Regulations (*VESCL&R*) and the Virginia Stormwater Management Laws and Regulations (*VSWML&R*), including coverage under the general permit for stormwater discharge from construction activities, and other applicable federal nonpoint source pollution mandates (e.g. Clean Water Act-Section 313, federal consistency under the Coastal Zone Management Act). Clearing and grading activities, installation of staging areas, parking lots, roads, buildings, utilities, borrow areas, soil stockpiles, and related land-disturbing activities that result in the total land disturbance of equal to or greater than 2,500 square feet in a Chesapeake Bay Preservation Area would be regulated by *VESCL&R*. Accordingly, GSA must prepare and implement an Erosion and Sediment Control plan to ensure compliance with state law and regulations. The ESC plan is submitted to DEQ NRO which serves the area where the project is located for review for compliance. GSA is ultimately responsible for achieving project compliance through oversight of on-site contractors, regular field inspection, prompt action against non-compliant sites, and other mechanisms consistent with agency policy.

2(b)(ii) Virginia Stormwater Management Program General Permit for Stormwater Discharges from Construction Activities (VAR10). The operator or owner of a construction activity involving land disturbance of equal to or greater than 1 acre is required to register for coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities and develop a project specific stormwater pollution prevention plan (SWPPP). The SWPPP must be prepared prior to submission of the registration statement for coverage under the General Permit, and it must address water quality and quantity in accordance with the *Virginia Stormwater Management Program (VSMP) Regulations*. General information and registration forms for the General Permit are available on DEQ's website at www.deq.virginia.gov/Programs/Water/StormwaterManagement/VSMPPermits/ConstructionGeneralPermit.aspx.

2(c) Conclusion. Provided adherence to the above requirements, the project is consistent with the non-point source pollution control enforceable policy of the CZM Program.

3. Chesapeake Bay Preservation Areas/ Coastal Lands Management. The EA (page 23) states that Arlington County designated a Resource Protection Area (RPA) buffer of 100-feet around Doctors Run and its unnamed tributary. The proposed action will not directly impact the RPA. The FCD states that the project will encroach on 2.6-acres of Resource Management Area (RMA).

3(a) Agency Jurisdiction. The DEQ Office of Local Government Programs administers the Chesapeake Bay Preservation Act (Virginia Code §62.1-44.15:67 et seq.) and Chesapeake Bay Preservation Area Designation and Management Regulations (9 VAC 25-830-10 et seq.). Each Tidewater locality must adopt a program based on the Chesapeake Bay Preservation Act and the Chesapeake Bay Preservation

Area Designation and Management Regulations. The Act and regulations recognize local government responsibility for land use decisions and are designed to establish a framework for compliance without dictating precisely what local programs must look like. Local governments have flexibility to develop water quality preservation programs that reflect unique local characteristics and embody other community goals. Such flexibility also facilitates innovative and creative approaches in achieving program objectives. The regulations address nonpoint source pollution by identifying and protecting certain lands called Chesapeake Bay Preservation Areas. The regulations use a resource-based approach that recognizes differences between various land forms and treats them differently.

3(b) Agency Comments. In Arlington County, the areas protected by the *Chesapeake Bay Preservation Act*, as locally implemented, require conformance with performance criteria. These areas include RPAs and RMAs as designated by the local government. RPAs include tidal wetlands, certain non-tidal wetlands and tidal shores, and a minimum 100-foot vegetated buffer area located adjacent to and landward of these features and along both sides of any water body with perennial flow. RMAs, which require less stringent performance criteria, include all areas of the County outside of designated RPAs. Areas within the RMA are subject to the general performance criteria as specified in § 9VAC 25-830-130 of the Regulations and the local ordinance. Projects within the RMA must minimize land disturbance (including access and staging areas), retain existing vegetation and minimize impervious cover.

3(c) Agency Requirement. Under the Federal Consistency Regulations of the *Coastal Zone Management Act of 1972*, federal actions in Virginia must be conducted in a manner “consistent to the maximum extent practicable” with the enforceable policies of the Virginia Coastal Zone Management Program. Those enforceable policies are administered through the Chesapeake Bay Preservation Act and Regulations. Federal actions on installations located within Tidewater Virginia are required to be consistent with the performance criteria of the Regulations on lands analogous to locally designated RPAs and RMAs, as provided in §9VAC25-830-130 and 140 of the Regulations, including the requirement to minimize land disturbance (including access and staging areas), retain existing vegetation and minimize impervious cover as well as including compliance with the requirements of the *Virginia Erosion and Sediment Control Handbook*, and stormwater management criteria consistent with water quality protection provisions of the *Virginia Stormwater Management Regulations*. For land disturbance over 2,500 square feet, the project must comply with the requirements of the *Virginia Erosion and Sediment Control Handbook*.

3(d) Conclusion. Provided adherence with the above criteria requirements as provided in §9VAC25-830-130 and §9VAC25-830-140 of the Regulations (particularly as relates to avoiding encroachments and impacts to the 100-foot RPA buffer adjacent to Doctors Run), the proposed activity would be consistent with the *Chesapeake Bay Preservation Act* and the Regulations.

4. Air Pollution Control. The EA (page 23) states that there will be no significant change in local or regional air quality as a result of this project.

4(a) Agency Jurisdiction. The DEQ Air Division, on behalf of the State Air Pollution Control Board, is responsible for developing regulations that implement Virginia's Air Pollution Control Law (Virginia Code §10.1-1300 et seq.). DEQ is charged with carrying out mandates of the state law and related regulations as well as Virginia's federal obligations under the Clean Air Act as amended in 1990. The objective is to protect and enhance public health and quality of life through control and mitigation of air pollution. The division ensures the safety and quality of air in Virginia by monitoring and analyzing air quality data, regulating sources of air pollution, and working with local, state and federal agencies to plan and implement strategies to protect Virginia's air quality. The appropriate DEQ regional office is directly responsible for the issuance of necessary permits to construct and operate all stationary sources in the region as well as monitoring emissions from these sources for compliance. In the case of certain projects, additional evaluation and demonstration must be made under the general conformity provisions of state and federal law.

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

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

4(b) Agency Findings. The DEQ Air Division determined that the project area is located in an ozone non-attainment and emission control area for oxides of nitrogen (NO_x) and volatile organic compounds (VOCs) area. Precursors to ozone (O₃) pollution include VOCs and NO_x.

4(c) Recommendation. During construction activities, take all reasonable precautions to limit emissions of NO_x and VOCs, principally by controlling or limiting the burning of fossil fuels.

4(d) Requirements.

4(d)(i) Fugitive Dust. During construction, fugitive dust must be kept to a minimum by using control methods outlined in 9 VAC 5-50-60 et seq. of the *Regulations for the Control and Abatement of Air Pollution*. These precautions include, but are not limited to, the following:

- Use, where possible, of water or chemicals for dust control;
- Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;

- Covering of open equipment for conveying materials; and
- Prompt removal of spilled or tracked dirt or other materials from paved streets and removal of dried sediments resulting from soil erosion.

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

4(d)(iii) Fuel-Burning Equipment. Should the proposed project require the installation of fuel-burning equipment (boilers, generators, etc.), or other air pollution emitting equipment, the project may be subject to 9 VAC 5-80, Article 6, Permits for New and Modified sources.

4(d)(iv) Asphalt Paving. A precaution, which typically applies to road construction and paving work (9 VAC 5-45-780 *et seq.*), places limitations on the use of "cut-back" (liquefied asphalt cement, blended with petroleum solvents), and may apply to the project. The asphalt must be "emulsified" (predominantly cement and water with a small amount of emulsifying agent) except when specified circumstances apply. Moreover, there are time-of-year restrictions on its use from April through October in VOC emission control areas.

4(e) Conclusion. Provided adherence to the above requirements, the project is consistent with the air pollution control enforceable policy of the Virginia CZM Program.

5. Solid and Hazardous Wastes and Hazardous Materials. The EA (page 24) states that there are no hazardous, toxic, and radioactive waste sites known to be on the NFATC campus. New buildings and expansions will be constructed with non-toxic materials.

5(a) Agency Jurisdiction. On behalf of the Virginia Waste Management Board, the DEQ Division of Land Protection and Revitalization is responsible for carrying out the mandates of the Virginia Waste Management Act (Virginia Code §10.1-1400 *et seq.*), as well as meeting Virginia's federal obligations under the Resource Conservation and Recovery Act and the Comprehensive Environmental Response Compensation Liability Act, commonly known as Superfund. The DEQ Division of Land Protection and Revitalization also administers those laws and regulations on behalf of the State Water Control Board governing Petroleum Storage Tanks (Virginia Code §62.1-44.34:8 *et seq.*), including Aboveground Storage Tanks (9VAC25-91 *et seq.*) and Underground Storage Tanks (9VAC25-580 *et seq.* and 9VAC25-580-370 *et seq.*), also known as 'Virginia Tank Regulations', and § 62.1-44.34:14 *et seq.* which covers oil spills.

Virginia:

- Virginia Waste Management Act, Virginia Code § 10.1-1400 *et seq.*
- *Virginia Solid Waste Management Regulations*, 9 VAC 20-81
 - (9 VAC 20-81-620 applies to asbestos-containing materials)
- *Virginia Hazardous Waste Management Regulations*, 9 VAC 20-60
 - (9 VAC 20-60-261 applies to lead-based paints)
- *Virginia Regulations for the Transportation of Hazardous Materials*, 9 VAC 20-110.

Federal:

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

5(b) Agency Findings. DEQ's Division of Land Protection and Revitalization (DLPR) staff conducted a database search (1000-foot radius) and identified four petroleum release sites in close proximity which might impact the project activity (three are located on the NFATC campus). No waste sites of possible concern were found within the same zip code.

Petroleum Release Sites:

- PC#19993359, *Goodwill Northern Virginia Center*, 10 S. Glebe Road, Arlington, VA 22204. *Release Date: 04/27/1999. Status: Closed.*
- PC#19940369, *Arlington Hall – NFATC Former Building 402*, 111 S. George Mason Drive, Arlington, VA 22212. *Release Date: 08/31/1993. Status: Closed.*
- PC#19921760, *Arlington Hall – NFATC*, 4020 Arlington Blvd., Arlington, VA 22212. *Release Date: 02/19/1992. Status: Closed.*
- PC#19901134, *Arlington Hall – NFATC*, 4020 Arlington Blvd., Arlington, VA 22212. *Release Date: 02/09/1990. Status: Closed.*

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

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

The project manager should evaluate the identified petroleum releases to establish the location, nature and extent of the releases and the potential to impact the proposed project. Further information may be obtained from the DEQ Northern Virginia Regional Office at (703) 583-3800 (Tanks Program).

5(d) Requirements.

5(d)(i) Contaminated Waste. Any soil that is suspected of contamination or wastes that are generated must be tested and disposed of in accordance with applicable federal, state, and local laws and regulations.

5(d)(ii) Fuel Storage Tanks. The removal, relocation or closure or installation/operation of any regulated petroleum storage tanks, aboveground storage tank (AST) or underground storage tank (UST), must be conducted in accordance with the requirements of the Virginia Tank Regulations 9 VAC 25-91-10 et seq. (AST) and / or 9 VAC 25-580-10 et seq. (UST).

5(d)(iii) Petroleum Release Sites. If evidence of a petroleum release is discovered during implementation of this project, it must be reported to DEQ, as authorized by Virginia Code § 62.1-44.34.8 through 9 and 9 VAC 25-580-10 et seq.

5(d)(iv) Asbestos-Containing Materials and Lead-Based Paint. All structures being demolished should be checked for asbestos-containing materials (ACM) and lead-based paint (LBP) prior to demolition. If ACM or LBP are found, in addition to federal waste-related regulations, state regulations 9 VAC 20-80-620 for ACM and 9 VAC 20-60-261 for LBP must be followed.

6. Pesticides and Herbicides. DEQ recommends that the use of herbicides or pesticides for construction or landscape maintenance should be in accordance with the principles of integrated pest management. The least toxic pesticides that are effective in controlling the target species should be used to the extent feasible. Contact the Department of Agriculture and Consumer Services at (804) 786-3501 for more information.

7. Natural Heritage Resources. According to the EA (page 23), critical species habitat will not be impacted by this project.

7(a) Agency Jurisdiction.

(i) The Virginia Department of Conservation and Recreation's (DCR) Division of Natural Heritage (DNH). DNH's mission is conserving Virginia's biodiversity through inventory, protection and stewardship. The Virginia Natural Area Preserves Act (Virginia Code §10.1-209 through 217), authorized DCR to maintain a statewide database for conservation planning and project review, protect land for the conservation of biodiversity, and the protect and ecologically

manage the natural heritage resources of Virginia (the habitats of rare, threatened and endangered species, significant natural communities, geologic sites, and other natural features).

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

7(b) Agency Findings. DCR DNH has searched its Biotics Data System (Biotics) for occurrences of natural heritage resources from the area outlined on the submitted map. Biotics documents the presence of natural heritage resources within two miles of the site. However, due to the scope of the activity and the distance to the resources, DCR does not anticipate that the project will adversely impact these resources.

7(b)(i) State-listed Plant and Insect Species. DCR DNH determined that the proposed activity will not affect any documented state-listed threatened or endangered plants or insects.

7(b)(ii) State Natural Area Preserves. DCR's files do not indicate the presence of any State Natural Area Preserves under the agency's jurisdiction in the project vicinity.

7(c) Additional Information. The DGIF maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters that may contain additional information. Their database may be accessed from <http://vafwis.org/fwis/> or contact Ernie Aschenbach at 804-367-2733 or Ernie.Aschenbach@dgif.virginia.gov.

7(d) Recommendation. Contact DCR-DNH to secure updated information on natural heritage resources if the scope of the project changes and/or six months has passed before it is utilized. New and updated information is continually added to the Biotics Data System.

8. Water Supply. According to the EA (page 24), existing plumbing connections will serve the new buildings. Impacts to surface waters are not anticipated (page 22).

8(a) Agency Jurisdiction. The Virginia Department of Health (VDH) Office of Drinking Water reviews projects for the potential to impact public drinking water sources (groundwater wells, springs and surface water intakes). VDH administers both federal and state laws governing waterworks operation.

8(b) Agency Findings. VDH-ODW found that there are no apparent impacts to public

drinking water sources as a result of this project.

8(c) Requirement. Potential impacts to public water distribution systems must be verified by the local utility.

9. Transportation Impacts. The EA (page 36) indicates that a traffic study was completed to examine impacts the proposal may have on transportation. Based on the study, a new traffic signal and southbound left turn lane is warranted at the intersection of George Mason Drive and the South Gate Entrance.

9(a) Agency Jurisdiction. The Virginia Department of Transportation (VDOT) provides comments pertaining to potential impacts to existing and future transportation systems.

9(b) Agency Findings. The VDOT Northern Virginia District reviewed the proposal and submitted a letter outlining a number of inaccuracies in the document, concerns related to adequate parking and access management in light of the added perimeter security. Refer to the attached memorandum (dated January 12, 2017) for specific details and comments.

9(c) Recommendation. Complete a comprehensive parking study to include field observation and counts of the surrounding neighborhoods to address the potential concerns or needs of nearby residents whose neighborhoods may be being utilized for parking by NFATC visitors.

The project should adhere to the Arlington County Comprehensive Plan, including considering bike and pedestrian facilities for the adjacent streets.

9(d) Requirement. The GSA is responsible for compliance with state and federal environmental laws if work must be completed within the state right-of-way operated and maintained by VDOT.

10. Historic and Archeological Resources. The EA (page 19) indicates that consultation with DHR is ongoing. There are no structures that are listed or eligible for listing on National Register of Historic Place on the NFATC campus. Four test areas were identified as having the potential to contain significant archaeological resources. During prior consultation, DHR recommended that if construction activities would disturb any of the identified test area, a Phase I archaeological survey would be required prior to construction.

10(a) Agency Jurisdiction. The Department of Historic Resources (DHR) conducts reviews of projects to determine their effect on historic structures or cultural resources under its jurisdiction. DHR, as the designated State's Historic Preservation Office, ensures that federal actions comply with Section 106 of the National Historic Preservation Act of 1962 (NHPA), as amended, and its implementing regulation at 36 CFR Part 800. The NHPA requires federal agencies to consider the effects of federal

projects on properties that are listed or eligible for listing on the National Register of Historic Places. Section 106 also applies if there are any federal involvements, such as licenses, permits, approvals or funding. DHR also provides comments to DEQ through the state environmental impact report review process.

10(b) Recommendation. Continue to coordinate with DHR pursuant to Section 106 of the National Historic Preservation Act, as amended, and its implementing regulation 36 CFR Part 800.

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

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

- Consider development of an effective Environmental Management System (EMS). An effective EMS will ensure that the proposed facility is committed to complying with environmental regulations, reducing risk, minimizing environmental impacts, setting environmental goals, and achieving improvements in its environmental performance. DEQ offers EMS development assistance and recognizes facilities with effective Environmental Management Systems through its Virginia Environmental Excellence Program (VEEP). VEEP provides recognition, annual permit fee discounts, and the possibility for alternative compliance methods.
- Consider environmental attributes when purchasing materials. For example, the extent of recycled material content, toxicity level, and amount of packaging should be considered and can be specified in purchasing contracts.
- Consider energy efficiency when choosing materials and products, like insulation, fixtures, and HVAC systems.
- Consider contractors' commitment to the environment when choosing contractors. Specifications regarding raw materials and construction practices can be included in contract documents and requests for proposals.
- Choose sustainable materials and practices for building construction and design.
- Integrate pollution prevention techniques into the facility maintenance and operation, to include inventory control for centralized storage of hazardous materials. Maintenance facilities should have sufficient and suitable space to allow for effective inventory control and preventive maintenance.

DEQ's Office of Pollution Prevention provides information and technical assistance relating to pollution prevention techniques and EMS. If interested, please contact

Meghann Quinn, (804) 698-4021.

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

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

13. Energy Conservation. The proposed facility should be planned and designed to comply with state and federal guidelines and industry standards for energy conservation and efficiency. The commonwealth encourages architectural and engineering designers to recognize and incorporate the energy, environmental, and sustainability concepts listed in the LEED Green Building Rating System into the development and procurement of their projects.

The energy efficiency of the facilities can be enhanced by maximizing the use of the following:

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

Contact the Department of Mines, Minerals and Energy, David Spears at (434) 951-6350, for assistance in meeting this challenge.

FEDERAL CONSISTENCY UNDER THE COASTAL ZONE MANAGEMENT ACT

Pursuant to the Coastal Zone Management Act of 1972 (§ 1456(c)), as amended, and the federal consistency regulations implementing the CZMA (15 CFR Part 930, Subpart C, § 930.30 *et seq.*), federal actions that can have reasonably foreseeable effects on Virginia's coastal uses or resources must be conducted in a manner which is consistent,

to the maximum extent practicable, with the Virginia Coastal Zone Management (CZM) Program. The CZM Program is comprised of a network of programs administered by several agencies. In order to be consistent with the CZM Program, the federal agency must obtain all the applicable permits and approvals listed under the enforceable policies of the CZM Program prior to commencing the project.

Federal Consistency Public Participation

In accordance with 15 CFR § 930.2, public notice of the proposed action was published in the OEIR Program Newsletter and on DEQ's web site from December 16, 2016 to January 13, 2017. No public comments were received in response to the notice.

Federal Consistency Documentation

A Federal Consistency Determination for the proposed project was submitted as a cover letter with the draft EA. The document provided an analysis of the project's impact on each of the nine enforceable policies. According to the FCD, the project will be consistent with each of the enforceable policies and will have no significant impact on Virginia's coastal zone.

These impacts and jurisdictional agency comments, recommendations, and requirements for the enforceable policies that apply to this proposal are discussed above in the "Environmental Impacts and Mitigation" section of this document.

Federal Consistency Concurrence

Based on our review of the FCD and the comments submitted by agencies administering the enforceable policies of the CZM Program, DEQ finds that the proposal is consistent to the maximum extent practicable with the CZM Program provided all applicable permits and approvals are obtained as described below in the Regulatory and Coordination Needs section. However, other state approvals which may apply to this project are not included in this consistency concurrence. Therefore, the GSA must ensure that this project is operated in accordance with all applicable federal, state and local laws and regulations.

REGULATORY AND COORDINATION NEEDS

1. Nonpoint Source Pollution Control.

1(a) Erosion and Sediment Control and Stormwater Management. The GSA must 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.). Land-disturbing activities of equal to or greater than 2,500 square feet or more in a Chesapeake Bay Preservation Area would be regulated by *VESCL&R* and *VSWML&R*.

Erosion and sediment control, and stormwater management questions should be

directed to the DEQ NRO at (703) 583-3800.

1(b) Virginia Stormwater Management Program General Permit for Stormwater Discharges from Construction Activities (VAR10). For projects involving land-disturbing activities of equal to or greater than one acre the applicant is required to 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.*). Specific questions regarding the Stormwater Management Program requirements should be directed to DEQ, Holly Sepety at (804) 698-4039.

2. Air Quality Regulations. Guidance on minimizing the emission of VOCs and NO_x during construction may be obtained from DEQ NRO. Activities associated with this project may be subject to air regulations administered by DEQ. The installation of fuel burning equipment (e.g. boilers and generators), may require a permit (9 VAC 5-50-10 *et seq.* and 9 VAC 5-80-10 *et seq.*) prior to construction. For additional information and coordination concerning potential requirements for air pollution control, contact DEQ-NRO at (703) 583-3800.

3. Solid and Hazardous Wastes. All solid waste, hazardous waste, and hazardous materials must be managed in accordance with all applicable federal, state, and local environmental regulations.

For additional information concerning location and availability of suitable waste management facilities in the project area or if free product, discolored soils, or other evidence of contaminated soils are encountered, contact DEQ NRO at (703) 583-3800.

3(a) Asbestos-Containing Material. It is the responsibility of the owner or operator of a demolition activity to thoroughly inspect the affected part of the facility prior to demolition for the presence of asbestos, including Category I and Category II nonfriable asbestos-containing material. Upon classification as friable or non-friable, all asbestos-containing material shall be disposed of in accordance with the Virginia Solid Waste Management Regulations (9 VAC 20-80-640) and transported in accordance with the Virginia regulations governing Transportation of Hazardous Materials (9 VAC 20-110-10 *et seq.*). Contact DEQ NRO (Kathryn Perszyk at 703-583-3856) and/or the Department of Labor and Industry (Ronald L. Graham at 804-371-0444) for additional information.

3(b) Lead-Based Paint. This project must comply with the U.S. Department of Labor, Occupational Safety and Health Administration (OSHA) regulations and with the Virginia Lead-Based Paint Activities Rules and Regulations. For additional information regarding these requirements, contact the Department of Professional and Occupational Regulation at (804) 367-8500.

4. Natural Heritage Resources. Contact DCR-DNH, Rene Hypes at (804) 371-2708, to secure updated information on natural heritage resources if the scope of the project

changes and/or six months has passed before the project is implemented, since new and updated information is continually added to the Biotics Data System.

5. Coastal Lands Management. The project must 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.).

For additional information and coordination, contact DEQ-OLGP, Daniel Moore at (804) 698-4520.

6. Historic Resources. Continue to coordinate, as needed, with DHR (Roger Kirchen, 804-482-6091) pursuant to Section 106 of the National Historic Preservation Act, as amended, and its implementing regulation 36 CFR Part 800.

7. Water Distribution and Sewage Collection System. Impacts on the public water distribution and sanitary sewer collection system must be verified with the local utility. Contact VDH (Arlene Warren, 804-864-7781) with questions.

8. Transportation Impacts. Coordinate with the VDOT Northern Virginia district (Regina Moore, 703-259-1999) regarding its recommendation to conduct a comprehensive parking study.

CONCLUSION

Thank you for the opportunity to review and respond to the draft Environmental Assessment and Federal Consistency Determination for the NFATC 2016 Master Plan Update in Arlington County. Detailed comments of reviewing agencies are attached for your review. Please contact me at (804) 698-4204 or Janine Howard at (804) 698-4299 for clarification of these comments.

Sincerely,



Bettina Sullivan, Program Manager
Environmental Impact Review

Ec: Amy Ewing, DGIF
Robbie Rhur, DCR
Susan Douglas, VDH
Roger Kirchen, DHR

Elizabeth Jordan, VDOT
Tony Watkinson, VMRC
Mark Gibb, Northern Virginia Regional Commission
Mark Schwartz, Arlington County
Alexis Gray, GSA



COMMONWEALTH of VIRGINIA

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MEMORANDUM

TO: Janine Howard, DEQ EIR Coordinator

FROM: Daniel Moore, Principal Environmental Planner

DATE: December 15, 2016

SUBJECT: DEQ # 16-238F: GSA – National Foreign Affairs Training Center 2016 Master Plan Update Project, Arlington County

We have reviewed the Federal Consistency Determination (FCC) for the proposed National Foreign Affairs Training Center Master Plan Update project and offer the following comments regarding consistency with the provisions of the *Chesapeake Bay Preservation Area Designation and Management Regulations* (Regulations):

In Arlington County, the areas protected by the *Chesapeake Bay Preservation Act*, as locally implemented, require conformance with performance criteria. These areas include Resource Protection Areas (RPAs) and Resource Management Areas (RMAs) as designated by the local government. RPAs include tidal wetlands, certain non-tidal wetlands and tidal shores, and a minimum 100-foot vegetated buffer area located adjacent to and landward of these features and along both sides of any water body with perennial flow. RMAs, which require less stringent performance criteria, include all areas of the County outside of designated RPAs. Areas within the RMA are subject to the general performance criteria as specified in § 9VAC 25-830-130 of the Regulations and the local ordinance. Projects within the RMA must minimize land disturbance (including access and staging areas), retain existing vegetation and minimize impervious cover.

Under the Federal Consistency Regulations of the *Coastal Zone Management Act of 1972*, federal actions in Virginia must be conducted in a manner “consistent to the maximum extent practicable” with the enforceable policies of the Virginia Coastal Zone Management Program. Those enforceable policies are administered through the Chesapeake Bay Preservation Act and Regulations. Federal actions on installations located within Tidewater Virginia are required to be consistent with the performance criteria of the Regulations on lands analogous to

locally designated RPAs and RMAs, as provided in §9VAC25-830-130 and 140 of the Regulations, including the requirement to minimize land disturbance (including access and staging areas), retain existing vegetation and minimize impervious cover as well as including compliance with the requirements of the *Virginia Erosion and Sediment Control Handbook*, and stormwater management criteria consistent with water quality protection provisions of the *Virginia Stormwater Management Regulations*.” For land disturbance over 2,500 square feet, the project must comply with the requirements of the *Virginia Erosion and Sediment Control Handbook*.

Page 2.2.1 of The NFATC Master Plan Update describes Alternative #1 that proposes (among other construction activities elsewhere on the NFATC campus) an addition to the Childcare Center on the southern side of the existing facility. Reconfiguration of the pick-up/drop-off area for the Childcare Center would result in the elimination of approximately 24 parking spaces. This area is west of and immediately adjacent to a RPA buffer designated by Arlington County for the protection of Doctor’s Run. The Master Plan Update indicates that the proposed development activities associated with the Childcare Center expansion would not impact the Doctor’s Run RPA.

Provided adherence to the above performance criteria requirements (particularly as relates to avoiding encroachments and impacts to the 100-foot RPA buffer adjacent to Doctor’s Run, the proposed activity would be consistent with the Regulations and the *Chesapeake Bay Preservation Act*.

**DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF AIR PROGRAM COORDINATION**

ENVIRONMENTAL REVIEW COMMENTS APPLICABLE TO AIR QUALITY

TO: Janine L. Howard

DEQ - OEIA PROJECT NUMBER: DEQ #16-238F

PROJECT TYPE: STATE EA / EIR FEDERAL EA / EIS SCC

X CONSISTENCY DETERMINATION

PROJECT TITLE: National Foreign Affairs Training Center 2016 Master Plan Update

PROJECT SPONSOR: General Services Administration

PROJECT LOCATION: OZONE NONATTAINMENT
AND EMISSION CONTROL AREA FOR NOX & VOC

REGULATORY REQUIREMENTS MAY BE APPLICABLE TO: MASTER PLAN
 OPERATION

STATE AIR POLLUTION CONTROL BOARD REGULATIONS THAT MAY APPLY:

1. 9 VAC 5-40-5200 C & 9 VAC 5-40-5220 E – STAGE I
2. 9 VAC 5-45-760 et seq. – Asphalt Paving operations
3. 9 VAC 5-130 et seq. – Open Burning
4. 9 VAC 5-50-60 et seq. Fugitive Dust Emissions
5. 9 VAC 5-50-130 et seq. - Odorous Emissions; Applicable to _____
6. 9 VAC 5-60-300 et seq. – Standards of Performance for Toxic Pollutants
7. 9 VAC 5-50-400 Subpart _____, Standards of Performance for New Stationary Sources, designates standards of performance for the _____
8. 9 VAC 5-80-1100 et seq. of the regulations – Permits for Stationary Sources
9. 9 VAC 5-80-1605 et seq. Of the regulations – Major or Modified Sources located in PSD areas. This rule may be applicable to the _____
10. 9 VAC 5-80-2000 et seq. of the regulations – New and modified sources located in non-attainment areas
11. 9 VAC 5-80-800 et seq. Of the regulations – State Operating Permits. This rule may be applicable to _____

COMMENTS SPECIFIC TO THE PROJECT:

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



(Kotur S. Narasimhan)
Office of Air Data Analysis

DATE: December 15, 2016

Howard, Janine (DEQ)

From: Burstein, Daniel (DEQ)
Sent: Wednesday, December 21, 2016 10:57 AM
To: Howard, Janine (DEQ)
Subject: Re: GSA - National Foreign Affairs Training Center 2016 Master Plan Update, DEQ #16-238F-Review

NRO comments regarding the Federal Consistency Determination for the GSA - National Foreign Affairs Training Center 2016 Master Plan Update, located in Arlington County, Virginia are as follows:

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

Air Compliance/Permitting - The project manager is reminded that during the construction phases that occur with this project; the project is subject to the Fugitive Dust/Fugitive Emissions Rule 9 VAC 5-50-60 through 9 VAC 5-50-120. In addition, should the project install fuel burning equipment (Boilers, Generators, Compressors, etc...), or any other air pollution emitting equipment, the project may be subject to 9 VAC 5-80, Article 6, Permits for New and Modified sources and as such the project manager should contact the Air Permit Manager DEQ-NRO prior to installation or construction, and operation, of fuel burning or other air pollution emitting equipment for a permitting determination. Lastly, should any open burning or use of special incineration devices be employed in the disposal of land clearing debris during demolition and construction, the operation would be subject to the Open Burning Regulation 9 VAC 5-130-10 through 9 VAC 5-130-60 and 9 VAC 5-130-100.

Virginia Water Protection Permit (VWPP) Program – The project manager is reminded that a VWP permit from DEQ may be required should impacts to surface waters be necessary. DEQ VWP staff recommends that the avoidance and minimization of surface water impacts to the maximum extent practicable as well as coordination with the US Army Corps of Engineers. Upon receipt of a Joint Permit Application for the proposed surface water impacts, DEQ VWP Permit staff will review the proposed project in accordance with the VWP permit program regulations and current VWP permit program guidance.

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

Daniel Burstein
Regional Enforcement Specialist, Senior II



MEMORANDUM

TO: Janine Howard, DEQ/EIR Environmental Program Planner

FROM: Katy Dacey, Division of Land Protection & Revitalization Review Coordinator

DATE: December 15, 2016

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

SUBJECT: Environmental Impact Review: EIR Project No 16-238F National Foreign Affairs Training Center 2016 Master Plan Update, Arlington County, VA

The Division of Land Protection & Revitalization (DLPR) has completed its review of the December 2016 EIR for the National Foreign Affairs Training Center 2016 Master Plan Update located at 4000 Arlington Blvd in Arlington, VA 22204.

Project Scope: Updated information to the 1989 master plan and the 2005 update to include expansion of Childcare Center and perimeter security enhancements reflecting updated federal facilities requirements.

Some solid and hazardous waste issues were addressed in the submittal. The submittal did not indicate that a search of Federal or State environmental databases was conducted. DLPR staff conducted a search (1000 foot radius) of solid and hazardous waste databases (including petroleum releases) to identify waste sites in close proximity to the project area. DLPR search did identify four waste sites in close proximity which might impact the project. Additionally, no waste sites of possible concern were located within the zip code of the project area, 22204. DLPR staff has reviewed the submittal and offers the following comments:

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

CERCLA Sites – none in the same zip code of the project area

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

Solid Waste – none in close proximity to project area

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

Petroleum Releases - four in close proximity to project area

**PC#19993359, Goodwill Northern Virginia Center, 10 S. Glebe Road, Arlington, VA 22204.
Release Date: 04/27/1999. Status: Closed.**

**PC#19940369, Arlington Hall – NFATC Former Building 402, 111 S. George Mason Drive,
Arlington, VA 22212. Release Date: 08/31/1993. Status: Closed.**

**PC#19921760, Arlington Hall – NFATC, 4020 Arlington Blvd., Arlington, VA 22212. Release
Date: 02/19/1992. Status: Closed.**

**PC#19901134, Arlington Hall – NFATC, 4020 Arlington Blvd., Arlington, VA 22212. Release
Date: 02/09/1990. Status: Closed.**

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

PROJECT SPECIFIC COMMENTS

None

GENERAL COMMENTS

Soil, Sediment, Groundwater, and Waste Management

Any soil, sediment or groundwater that is suspected of contamination or wastes that are generated must be tested and disposed of in accordance with applicable Federal, State, and local laws and regulations. Some of the applicable state laws and regulations are: Virginia Waste Management Act, Code of Virginia Section 10.1-1400 *et seq.*; Virginia Hazardous Waste Management Regulations (VHWMR) (9VAC 20-60); Virginia Solid Waste Management Regulations (VSWMR) (9VAC 20-81); Virginia Regulations for the Transportation of Hazardous Materials (9VAC 20-110). Some of the applicable Federal laws and regulations are: the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Section 6901 *et seq.*, and the applicable regulations contained in Title 40 of the Code of Federal Regulations; and the U.S. Department of Transportation Rules for Transportation of Hazardous Materials, 49 CFR Part 107.

Asbestos and/or Lead-based Paint

All structures being demolished/renovated/removed should be checked for asbestos-containing materials (ACM) and lead-based paint (LBP) prior to demolition. If ACM or LBP are found, in addition to the federal waste-related regulations mentioned above, State regulations 9VAC 20-81-620 for ACM and 9VAC 20-60-261 for LBP must be followed. Questions may be directed to Kathryn Perszyk at the DEQ's Northern Virginia Regional Office at (703) 583-3856.

Pollution Prevention – Reuse - Recycling

Please note that DEQ encourages all construction projects and facilities to implement pollution prevention principles, including the reduction, reuse, and recycling of all solid wastes generated. All generation of hazardous wastes should be minimized and handled appropriately.

If you have any questions or need further information, please contact Katy Dacey at (804) 698-4274.

Molly Joseph Ward
Secretary of Natural Resources

Clyde E. Cristman
Director



Rochelle Altholz
Deputy Director of
Administration and Finance

David C. Dowling
Deputy Director of
Soil and Water Conservation
and Dam Safety

Thomas L. Smith
Deputy Director of Operations

COMMONWEALTH of VIRGINIA
DEPARTMENT OF CONSERVATION AND RECREATION

MEMORANDUM

DATE: January 5, 2017
TO: Janine Howard, DEQ
FROM: Roberta Rhur, Environmental Impact Review Coordinator
SUBJECT: DEQ 16-238F, National Foreign Affairs Training Center 2016 Master

Division of Natural Heritage

The Department of Conservation and Recreation's Division of Natural Heritage (DCR) has searched its Biotics Data System for occurrences of natural heritage resources from the area outlined on the submitted map. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.

Biotics documents the presence of natural heritage resources within two miles of the project area. However, due to the scope of the activity and the distance to the resources, we do not anticipate that this project will adversely impact these natural heritage resources.

There are no State Natural Area Preserves under DCR's jurisdiction in the project vicinity.

Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the DCR, DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species. The current activity will not affect any documented state-listed plants or insects.

New and updated information is continually added to Biotics. Please re-submit project information and map for an update on this natural heritage information if the scope of the project changes and/or six months has passed before it is utilized.

The Virginia Department of Game and Inland Fisheries (VDGIF) maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters that may contain information not documented in this letter. Their database may be accessed from <http://vafwis.org/fwis/> or contact Ernie Aschenbach at 804-367-2733 or Ernie.Aschenbach@dgif.virginia.gov.

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

Howard, Janine (DEQ)

From: Fulcher, Valerie (DEQ)
Sent: Monday, December 19, 2016 1:14 PM
To: Howard, Janine (DEQ)
Subject: FW: NEW PROJECT GSA NFATC 2016 16-238F

From: Warren, Arlene (VDH)
Sent: Monday, December 19, 2016 12:30 PM
To: Fulcher, Valerie (DEQ)
Subject: RE: NEW PROJECT GSA NFATC 2016 16-238F

Project Name: National Foreign Affairs Training Center 2016 Master Plan Update

Project #: 16-238 F

UPC #: N/A

Location: Arlington County

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

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

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.

There are no apparent impacts to public drinking water sources due to this project.

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



COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION

CHARLES A. KILPATRICK, P.E.
COMMISSIONER

4975 Alliance Drive
Fairfax, VA 22030

January 12, 2017

MEMORANDUM

To: Janine Howard; Department of Environmental Quality
From: Regina Moore; VDOT NoVA, Transportation Planning Section
Subj: GSA: National Foreign Affairs Training Center (NFATC) 2016 Master Plan Update

The purpose of this memorandum is to provide comments on the draft Environmental Assessment (EA) for the above-mentioned plan update.

The subject project consists of the latest update to the NFATC campus Master Plan which was completed in 2005. This 2016 Master Plan Update follows the previously established vision and includes the approved buildings of the original 1989 master plan and the 2005 update. The NFATC site comprises approximately 71 acres of land where the State Department maintains the property as an educational and training center. The center serves as a major federal government education facility for trainees in the Foreign Service and also 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. Three Master Plan Alternatives and the No-Action Alternative have been considered.

The VDOT, Northern Virginia District Office staff has reviewed the draft EA for the subject project and offer the following comments:

1. The cover letter (abstract) dated December 2016 states "*All improvements will remain within the existing 71-acre site*". However, page 39 states that signal warrant analyses conducted resulted in the need for construction of both a traffic signal and southbound left turn lane at the intersection of George Mason Drive and the South Gate Entrance. These are off-site (roadway) improvements. Please clarify.
2. According to the Master Plan, the campus will become a closed campus (only accessible to DOS employees & guests). As a result, physical security measures will be developed including a secure perimeter and gates staffed with security personnel. In those instances where random or comprehensive vehicle checks are necessary (depending upon threat level), what vehicular storage on site and rejection (turnaround), including large trucks, will be provided at the gated entrances? What improvements to the roadways at those gated entrances will be necessary to

facilitate the aforementioned (i.e., potential queuing back onto the roadway network during the highest threat level)?

3. According to the Master Plan, the campus will increase in total square feet of building area by 50% (311,000 sf) from 624,000 sf with 1690 parking spaces (currently) to 935,000 sf with 1,666 parking spaces (year 2025) - mostly office space. By calculations from Table 5 on page 19, the existing parking ratio is approximately 2.7 parking spaces per 1000 sf. Despite increasing the building sf by another 311,000 sf, the master plan decreases the total number of spaces therein resulting in a future parking ratio of 1.8 parking spaces per 1000 sf. Is this realistic given the types of users? While it is understood that parking ratio requirements are governed by county zoning, to include type of use, number of employees, etc., it seems the users of this site are more likely be single-car drivers coming from various distances throughout the VA-MD-DC area. They will be DOS employees who will be taking classes to prepare them for their service and, according to page 4, family members of DOS employees who will be serving abroad will be required to attend mandatory security training (the latter of which does not appear to be taken into account). Also, it does not seem likely that 100% of the increase in users will rely 100% on public transit.
4. Table 9 on page 38 states there will be no increase in faculty. Section 1.1, page 1 states "...*the facility expansion must accommodate the increased number of instructors and support personnel...*". These statements contradict each other and an increase in instructors and support personnel do not appear to be accounted for. Please clarify.
5. Table 9 on page 38 states an increase in on-campus students from 1,765 students to 2,409 students (an increase in 644 students) by year 2025. Thus, as it relates to the above comment, if even 50% of the "student" increase is single-car drivers, that will result in a need for an additional 322 parking spaces.
6. Section 3.10, page 40, last paragraph notes that in the public scoping process, residents expressed concern that individuals on campus were parking in adjacent neighborhoods. However, the Master Plan dismisses this observation for various reasons noted. It is recommended that a comprehensive parking study be conducted to include the field observation and counts of the surrounding neighborhoods to supplement this finding and otherwise address the potential concerns and/or potential need.
7. The development should adhere to the concept mentioned in the Arlington County Comprehensive Plan. For example, are pedestrian/bike facilities being considered for the adjacent streets? This is a concern, since it appears that the site will rely on on-street parking.
8. If work is required to be done within the state right-of-way operated and maintained by VDOT, then GSA or their designee would be responsible for compliance with applicable federal and state environment laws.

Cc: Mr. Robert Caparas, VDOT
Mr. Brian Costello, VDOT
Mr. Jim Cromwell, VDOT
Ms. Elizabeth Jordan, VDOT
Mr. Paul Kraucunas, VDOT
Mr. John Muse, VDOT
Mr. Imad Salous, VDOT
Mr. Norman Whitaker, VDOT
Mr. Terry Yates, VDOT



COMMONWEALTH of VIRGINIA

Department of Historic Resources

Molly Joseph Ward
Secretary of Natural Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Julie V. Langan
Director

Tel: (804) 367-2323
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www.dhr.virginia.gov

March 13, 2017

Nancy Witherell
Regional Historic Preservation Officer
U.S. General Services Administration
National Capital Region

Re: George P. Shultz National Foreign Affairs Security Training Center (NFATC)
Master Plan Update
Arlington, Virginia
DHR File No. 2016-0732

Dear Ms. Witherell:

Thank you for your letter of February 10, 2017 providing the Department of Historic Resources with a viewshed analysis and revised Area of Potential Effects (APE). Based on the documentation provided, we agree that the proposed Master Plan Update has the potential to have adverse effects on historic properties. Because the effects cannot be fully determined prior to approval of the undertaking, we agree that a programmatic agreement (PA) should be developed.

DHR understands that GSA:

- Has revised the APE to include the Unitarian Universalist Church in Arlington;
- Will retain the existing boundaries of the Arlington Hall Station Historic District for the purposes of its current determination of adverse effect and will revisit the survey and subsequent potential boundary reduction efforts as an action item under the PA;
- Will address the proposed vegetative screening and species in consultation under the PA on the landscape design development for campus.
- Will include the design review process in the PA.

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962 Kime Lane
Salem, VA 24153
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Northern Region Office
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DHR also understand that the historic meadows and bridges retain integrity and will not be altered, but integrated into the final landscape design.

While we understand that Arlington Hall Station Historic District's (DHR ID#000-0018) integrity has been diminished by the National Guard complex and the cumulative effects of other construction projects, preserving the remaining historic resource integrity is, therefore, all the more important going forward. The design details of the proposed new buildings should be contemporary and compatible to the District as well as being sensitive to the remaining historic resources left in the District.

We also recommend that the New Security Fencing design, the limits of disturbance for the installation of the fencing and the secondary effects that this will have on the landscape and/or campus layout, should be also addressed in continued consultation under the PA.

We appreciate GSA's plans to address archaeology, building design review, the Arlington Hall Historic District boundary reduction and protocols for developing criteria for avoidance and mitigation as well as mitigation in the PA. We note that the Advisory Council on Historic Preservation (AHP) has elected to participation in consultation toward the PA. Please continue your outreach with the tribes and the Arlington Department of Planning, Housing and Development, the Arlington Historical Society, the National Guard Bureau and the National Capital Region Planning Commission, as you proceed in the development of the PA.

If you have any questions concerning our comments, or if we may provide any further assistance, please do not hesitate to contact me (for archaeology) at (804)482-6088; e-mail ethel.eaton@dhr.virginia.gov, or and Adrienne Birge-Wilson at (804) 482-6092;e-mail adrienne.birge-wilson@dhr.virginia.gov (for architectural issues). We look forward to working with you, the ACHP, and the other consulting parties to bring this project to a successful resolution.

Sincerely,



Ethel R. Eaton, Ph.D., Senior Policy Analyst
Review and Compliance Division

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**Draft EA for NFATC 2017 Master Plan Update:
COUNTY (Arlington) COMMENTS**



STEVE COVER
DIRECTOR, DCPHD

ARLINGTON COUNTY, VIRGINIA
DEPARTMENT OF COMMUNITY PLANNING,
HOUSING AND DEVELOPMENT

2100 CLARENDON BOULEVARD, SUITE 700
ARLINGTON, VIRGINIA 22201
(703) 228-3525 • FAX (703) 228-3543



ROBERT J. DUFFY, AICP
PLANNING DIRECTOR

January 13, 2017

Ms. Alexis Gray, NEPA Compliance Specialist

Office of Planning and Design Quality
U.S. General Services Administration, National Capital Region
301 7th Street, SW/Suite 4004
Washington, DC 20407

Alexis.gray@gsa.gov

Re: Draft Environmental Assessment, National Foreign Affairs Training Center (NFATC)

Thank you for the opportunity to comment on the Draft Environmental Assessment for the NFATC Master Plan Update. Arlington County staff has reviewed the available information and pose the following questions and comments:

EA Volume 1 Section 3.2.1 Affected Environment, page #25.

The reference to a 75 foot building height allowed via a special use permit for school administration buildings. The Arlington County Zoning Ordinance special use permit would not apply in this case as the proposed Building B for training and classrooms would not be classified as a school administration building under the Zoning Ordinance use classification system. The Arlington County Zoning Ordinance, §12.2.4.I.1 establishes the following characteristics for the “Schools” category:

“Public and private (including charter or religious) schools at the primary, elementary, middle, junior high, or high school level that provide basic academic education.”

A more accurate use category for the proposed Building B would be as described in §12.2.4.A, “Colleges,” described by the following characteristics:

“This category includes not-for-profit colleges and other institutions of higher learning that offer courses of general or specialized study leading to a degree or professional certification. Colleges are generally in campus-like settings, on multiple blocks or in multiple buildings.”

Examples of uses in that category are described in the Zoning Ordinance as follows: "Examples include community colleges, liberal arts colleges, nursing or medical schools not accessory to hospitals, seminaries, trade or commercial schools, and universities."

Also of note in this reference is that on December 10, 2016, the County Board adopted an amendment to the Zoning Ordinance that revised the provision that previously allowed building height above 45 feet for high schools and school administration buildings on sites of 19 acres or more, subject to special use permit approval. The revisions now apply to all elementary, middle and high schools, and include a reference to the use classification system for "schools" (described above) in §12.2.4.I, to clarify the specific uses to which the standards apply. The revisions adopted on December 10, 2016 are in §4.2.4.A District use standards, Elementary, middle and high schools.

The proposed building B for training and classroom use taller than 45 feet would not be in compliance with Arlington County Zoning Ordinance Requirements for this use.

<https://arlingtonva.s3.dualstack.us-east-1.amazonaws.com/wp-content/uploads/sites/38/2016/06/ACZO.pdf>

EA Volume 1, Section 3.2.2 Significance of Effects, page #25.

The discussion above regarding building height in the S-3A district may alter the determination of no significant impact.

EA Volume 1, Section 3.0 Groundwater and Hydrology, page 21+

The proposed Build Alternative 1 will add 111,428 sf of impervious surface. This alternative is also likely to impact the existing stormwater pond. The addition of the perimeter security fence as well as construction of the child care center is likely to impact the Resource Protection Areas on the site - those impacts could be long-term. A determination of negligible or no impact for the EA categories of "Stormwater Management" and "Surface water, Wetlands, and Resource Protection Areas (RPAs) does not provide the substantive discussion of mitigation options required for the increase in stormwater runoff anticipated from site redevelopment or accurately anticipate the potential long-term impacts of this alternative on water resources.

EA Volume 1, Section 3, Climate Change and Sustainability, page 23-24

We appreciate the statements about implementing building design and transportation strategies to address challenges of climate change. We strongly encourage building design and construction to focus on "energy, waste, and water net zero use." An overall focus on minimizing fossil fuel consumption and reducing greenhouse gas emissions is critical. Careful planning and implementation will ensure that the structures at the site meet the goals of Arlington's Community Energy Plan and the County's commitment to sustainability. (<https://environment.arlingtonva.us/energy/community-energy-plan-cep/>)

EA Volume 1, 3.3.2, Affected Environment, page 33

We appreciate the Department of State's (DOS) continued commitment for retaining Arlington Hall Park for public use and for their partnership with Arlington County. We

look forward to working with DOS to renew the existing Memorandum of Understanding for use of the NFATC west parcel for public park uses.

EA Volume 1, Section 3.8.2.2, Historic Resources

- Arlington County's Certified Local Government office (the Historic Preservation Program) has not been independently contacted and asked to consult under CFR 800.2(c)(3), though we were able to comment on scoping documents in Summer 2016. Additional information that would typically be provided for independent comment (scope of APE, resources identified, assessment of adverse effects, mitigation/minimization, and discussion of the scope of an agreement document, have not taken place with this office. Many of the questions and comments raised on the Cultural Resources portion of the EA may be better addressed and answered through the concurrent Section 106 process. Materials emailed to County Historic Preservation staff this week (Tuesday, January 10th) regarding design mitigation and an evaluation of the APE have not been reviewed yet. Comments below reflect only the information made available in the Draft EA. Further review of the materials made available this week as part of the 106 consultation may augment or otherwise address comments contained here.
- The EA notes the DHR concurrence with the APE for archaeology; however, the DHR letter from Summer 2016 notes there is not enough information to concur on APE for architecture. Please update the EA to note DHR concurrence and date.
- Would recommend the Unitarian Universalist Church, listed to the National Register, be included in an expanded APE. There will be potential visual impacts to this property from the enhanced security fencing and traffic proposed for this project.
- The Arlington Heights neighborhood has been listed to the National Register (2008). The report notes that it is only eligible (pg. 35). Please update.
- Appreciate including and treating the Alcova Heights neighborhood as NR-eligible for purposes of this undertaking. Very useful in terms of evaluating the APE and visual and traffic impacts.
- We believe it is too early to apply 36CFR 800.5(a)(1) without concurrence on the architectural APE and the identification of properties under CFR 800.4(a).
- It seems that efforts have been made through designs of new facilities to minimize impacts to viewsheds both within and from the boundaries of the Arlington Hall NR district. We request information (renderings, elevations, sections, viewshed studies, fence design information, proposed limits of disturbance, location of construction staging activities and materials,etc.) to be able to evaluate and concur with this determination.
- The document acknowledges that there will be adverse impacts to the Arlington Hall NR district, and that some impacts have been minimized through design (see comment above). What is the status of an agreement document to resolve these adverse effects to the architectural resources of the district? A Programmatic Agreement for archaeology had been discussed with DHR, is there a proposed MOU for architectural resources proposed as well?
- Arlington County would ask to be consulted on any agreement documents for this project.

- Consider how the proposed traffic signal as part of your preferred option may impact your APE for architecture and cumulative impacts to traffic within the NR districts.
- Consider whether the leased training facility in Rosslyn should be included within a separate APE as the No Build Option v. the Build Options impacts State Department activity at this site.

EA Volume 1, Section 3.12.1, Past and Present Action

- This narrative and source material on the early history of Arlington could be improved. Recommend using some of the background from the Arlington Hall NR nomination instead, at least for the first paragraph.

EA Volume 1, Section 3.12.2, Reasonably Forseeable Actions

- This section does not discuss traffic impacts in Rosslyn.
- This section does not discuss viewshed impacts or adverse impacts from construction or construction staging activities within the NR district.

EA Volume 1, Section 3.12.3, Cumulative Effects

- Page 45 asserts no "substantive, adverse cumulative effects to the natural, cultural, and social environment." We request that more work be done to expand the APE for architecture, and identify impacts to historic properties within the expanded APE. While there may not be significant adverse effects under NEPA, there are acknowledged adverse effects under Section 106 that require mitigation. This section should note those impacts and refer to the Section 106 agreement documents that will resolve the adverse effects.

EA Volume 1, 3.4.1 Affected Environment, pages 26 & 27

Previously we have raised our concerns about the proposed closure of the pedestrian and bicycle trail between S. George Mason Drive and S. Quincy Street. Counts taken over the first two weeks of September found that on average there are about 76 users of the trail each weekday. Residents of the Alcova Heights neighborhood and the Arlington Pedestrian Advisory Committee have both expressed great concern about the potential loss of the trail.

Closure of the trail will require NFATC's neighbors from the Quincy and 6th Street area to walk considerably longer distances to reach bus stops along George Mason Drive and local schools via alternative routes. Many residents of the Alcova Heights neighborhood, along with the Arlington Pedestrian Advisory Commission have expressed significant opposition to the proposed trail closure. County staff disagree with the EA's conclusion that the trail closure would not have significant impacts and therefore no mitigation is required.

Arlington County requests time to explore the feasibility of the trail relocation and an assessment of potential benefits from a land swap or other land transaction along the NFATC southern boundary where it adjoins Alcova Heights Park.

If these options are not feasible, then DOS should include improvements and enhancements to the sidewalks and streets outside their property to provide safe

alternate routes for non-motorized travel. Improvements such as these will benefit DOS Transportation Demand Management goals for their facility and provide safe travel options for the community.

EA Volume 3, pages 32 and 33

DES 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. We however, do not agree with the EA's assertion that Arlington County should be financially responsible for installation of both a traffic signal and a southbound left-turn lane at the intersection. The left-turn lane would solely benefit the NFATC employees and students and should only be installed if the State Department or GSA pays for it. The proposed traffic signal has some utility for both the general public and NFATC and a shared cost arrangement would be more appropriate. However, at this time there are no County funds allocated for any traffic improvements at 6th and S. George Mason Drive.

EA Volume 3; page 32

While the EA recognizes that the installation of a left-turn lane on S. George Mason Drive will likely require removal of the on-street parking in front of about six private residences, it does not offer any mitigation measures. If a left-turn lane is installed, alternative parking options should be explored to provide replacement parking for these residents.

EA Volume 3, page 12

The EA recognizes that Arlington has concerns about the poor condition of the sidewalk along the Arlington Boulevard frontage of the NFATC campus including for NFATC to improve the sidewalk as mitigation towards potential closing of the trail or tunnel. The EA does not propose that any improvements be made. Moreover, the EA shows an upgrade to the NFATC perimeter fencing which appears to be partially within Arlington Boulevard right-of-way. The location of the fencing on VDOT property makes any future upgrades to the Arlington Boulevard sidewalk more difficult.

EA Volume 3; Traffic Impact Assessment

Impacts to pedestrians crossing S George Mason need to be more thoughtfully considered and measures to mitigate the additional traffic as well as the loss of an important pedestrian connection should be proposed. Should public access to the trail connecting to the pedestrian underpass on the east side of George Mason Drive be restricted, an alternative access point from the George Mason Drives sidewalk should be provided.

EA Volume 1; pages 31 & 32

As specified in the MOA, the community trail was originally intended to connect from County right-of-way at S. Oakland and 3rd Streets to S. Quincy Street and the George

Mason Drive underpass. See comment in EA Volume 1, Section 3.4.1, Affected Environment, pages 26-27.

At the time that the perimeter fencing along the west parcel is replaced, a new access point to permit pedestrian access directly into the park and playground area from the George Mason Drive Sidewalk should be provided. GSA should also consider constructing a direct vehicular access driveway from George Mason Drive to the West Parcel's overflow parking lot and close the existing access from the residential portion of S. Taylor Street.

EA Volume 1, 3.5.2, Significance of Effects, page 34

The landscape plan detailed in the master plan update is thorough and shows the value DOS places on creating a sustainable and attractive landscape on their campus. A note should be added to the master plan that 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.

EA Volume 3 – Traffic Impact Assessment

The traffic impact analysis needs to also consider impacts of that the additional traffic generated by the NFATC operations would have upon the un-signalized intersection of S George Mason and 4th St S.

Thank you again for the opportunity to comment on the Draft Environmental Assessment. If you have any follow-up questions, please contact me in the Planning Division at 703-228-3525.

Thanks,

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Arlington County CPHD
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CC: Gabriela Acurio, CMO
Steve Cover, Director, CPHD
Greg Emanuel, Director, DES
Jane Rudolph, Director, DPR



HISTORIC PRESERVATION SECTION
DEPARTMENT OF COMMUNITY PLANNING, HOUSING & DEVELOPMENT
ARLINGTON COUNTY, VIRGINIA

TO: Alexis Gray, NEPA Compliance Specialist, General Services Administration
Hector Abreu, Historic Preservation Specialist, General Services Administration

FROM: Rebeccah Ballo, Historic Preservation Planner, Arlington County Government

DATE: March 9, 2017

SUBJECT: Arlington County CLG Comments on Section 106 Documentation for the George P. Shultz National Foreign Affairs Training Center (NFATC) 2016 Master Plan Update

This memo contains the Arlington County Government, Historic Preservation Section's comments on the relevant documents made available for our review under Section 106 of the National Historic Preservation Act (NHPA) for the Master Plan Update at the George P. Shultz National Foreign Affairs Training Center (NFATC) located in Arlington, VA.. If there are any questions, please contact Rebeccah Ballo at r ballo@arlingtonva.us or 703-228-3812. We thank you for the opportunity to comment on this project.

1. The viewshed analysis, massing diagrams, and preliminary site plans demonstrate that proposed Building B will be constructed within very close proximity to the NR contributing gymnasium building. One elevation will be built within 26 feet of the historic building. We would encourage GSA to shift as much of the mass of the new building as possible to the south, in the area adjacent to the existing parking lot. There is no information provided regarding design guidelines or the potential architectural character of the proposed Building B. Given its immediate proximity to an historic building, we would strongly recommend that the new building attempt to respond to the historic gym in terms of the material palette, form, and detailing. The space between the historic gym and proposed Building B is narrow and care should be taken so that this area is landscaped or detailed appropriately. The connections between the new buildings, the historic buildings, and the ways in which circulation within the campus may be impacted have not been evaluated, but should be considered as part of final landscape plans for the campus.
2. The viewshed analysis from adjacent Arlington County National Register and National Register eligible districts demonstrated that Building B will be visible from a number of vantage points. We would encourage the design of this building to be highly articulated on all elevations. Even the “rear” elevation will be uniquely visible.
3. Viewshed studies provided for review did not take into accounts the new security fencing or the limits of disturbance required to install the new fencing. The installation of the fences may require that most of the small trees and understory growth that currently exist on the property lines, and that serve as a natural visual buffer between the NFATC and the neighborhoods will be removed. Therefore, we cannot concur or give a recommendation about viewshed impacts from the installation of new fencing; this information may also not be known by GSA at this time. We would recommend that if trees and natural landscape buffers must be removed, that GSA commit to replanting along the perimeters with evergreen or similar all-season landscape visual buffers.

- a. The portion of the property where the walking path is currently located will be newly fenced off and restricted as part of this undertaking. Viewshed analysis do not take these new measures into account, though comments from above regarding landscaping would apply.
4. Our office would like to be involved as a Consulting Party for any forthcoming Programmatic Agreements or other agreement documents for this Master Plan and associated undertakings.