

**ALBERT V. BRYAN U.S. COURTHOUSE
PERIMETER SECURITY IMPROVEMENTS
ENVIRONMENTAL ASSESSMENT**



ALEXANDRIA, VA

**U.S. GENERAL SERVICES ADMINISTRATION
IN COOPERATION WITH THE U.S. MARSHALS SERVICE**

March 2012

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ALBERT V. BRYAN U.S. COURTHOUSE PERIMETER SECURITY IMPROVEMENTS

ENVIRONMENTAL ASSESSMENT

Responsible Agency:
U.S. General Services Administration

Cooperating Agency:
U.S. Marshals Service

Abstract:

The U.S. General Services Administration (GSA), in cooperation with the U.S. Marshals Service (USMS), has prepared this Environmental Assessment (EA) for perimeter security improvements to the A.V. Bryan Courthouse (the courthouse) in Alexandria, VA. The project includes the installation of permanent perimeter security measures at the courthouse, the removal of the temporary security measures, the alteration of Jamieson Avenue and Courthouse Square South including narrowing the roadway and enhancing the public realm, and re-opening Courthouse Square South to vehicular traffic. This EA considers the environmental effects of implementing the No Action (No Build) Alternative and an Action Alternative.

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1.0 PURPOSE AND NEED

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1.1 WHAT ARE GSA AND USMS PROPOSING AND HOW IS THIS ENVIRONMENTAL ASSESSMENT BEING PREPARED?

The Albert V. Bryan U.S. Courthouse (A.V. Bryan Courthouse) is located at 2100 Jamieson Avenue in Alexandria, Virginia (Figure 1-1). The courthouse is located within the Carlyle District (Figure 1-2), a dense commercial and residential district developed in the 1990s on the site of a former rail yard. Owned by the U.S. General Services Administration (GSA), the courthouse is occupied by the U.S. Marshals Service (USMS), the U.S. Courts and the U.S. Attorney's Office.

The A.V. Bryan Courthouse is sited on a tightly defined urban lot bounded by Jamieson Avenue in the northwest, Courthouse Square South in the northeast, Elizabeth Lane in the east, and commercial development in the south. The area immediately surrounding the building is owned by GSA, while the balance of the project site is the property of the Carlyle Community Council (CCC) (Figure 1-3). Temporary perimeter security measures, including Jersey barriers and planters, are located within property owned by the CCC along the three public faces of the building, on Jamieson Avenue, Courthouse Square South, and Elizabeth Lane (Figure 1-4). GSA and the USMS propose to install permanent perimeter security measures at the courthouse, allowing for the removal of the temporary measures. As part of these improvements, Jamieson Avenue and Courthouse Square South would be narrowed slightly to allow for enhancements to the public realm. In addition, Courthouse Square South would be reopened to vehicular traffic.

GSA and USMS are preparing this Environmental Assessment (EA) to determine the potential impacts the perimeter security improvements may have on the natural and man-made environment. This EA is being prepared in compliance with the National Environmental Policy Act

(NEPA) of 1969, as amended, the Council on Environmental Quality (CEQ) regulations implementing NEPA [40 Code of Federal Regulations (CFR) 1500-1508 (1986)], and GSA's *PBS NEPA Desk Guide*.

Agencies and organizations were involved in the development of this EA through the public scoping process. GSA and USMS initiated the public scoping process on October 21, 2011 through the distribution of letters requesting comments on the perimeter security improvements. The public comment period was open through November 4, 2011 and seven comment letters were received. These letters are included in Appendix A: Scoping Letters. Comments received during this period were taken into consideration in the development of this EA.

GSA also prepared a Federal Consistency Determination (FCD) for the perimeter security improvements and submitted the document to the Commonwealth of Virginia Department of Environmental Quality (DEQ) on December 12, 2011. The FCD determined that the perimeter security improvements at the A.V. Bryan Courthouse would be consistent, to the maximum extent practicable, with the Virginia Coastal Zone Management Program (VCP). The FCD is included as Appendix C. GSA received concurrence with its finding from DEQ on January 31, 2012, provided that the project complies with the applicable permits, approvals, and conditions of the enforceable policies of the VCP.

Comments on the FONSI and EA must be submitted during the 15-day public comment period. The comment period concludes March 27, 2012 and written comments must be postmarked by this date.

Comments should be mailed or emailed to:

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Providing that no information leading to a contrary finding is
postmarked during the 15-day public comment period, the FONSI will
become final on March 27, 2012.

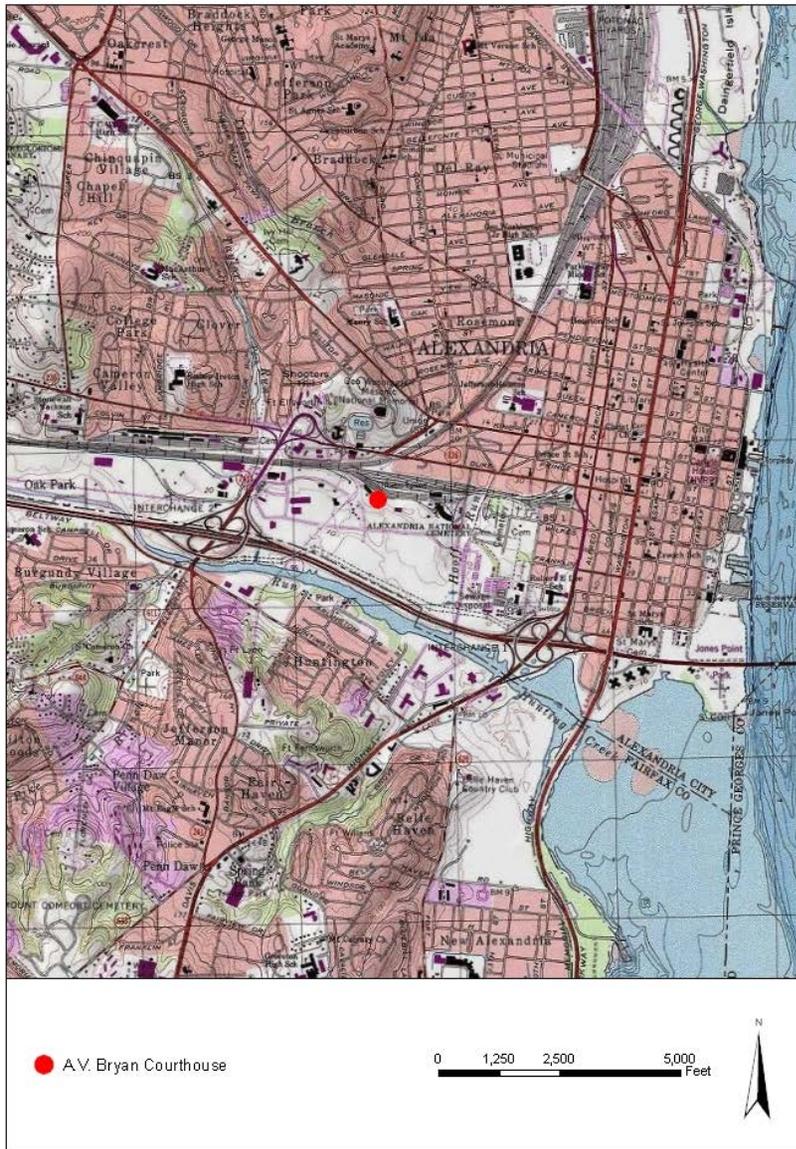


Figure 1-1: Regional Location
Source: USGS



Figure 1-2: Aerial of the Project Site
Source: AECOM

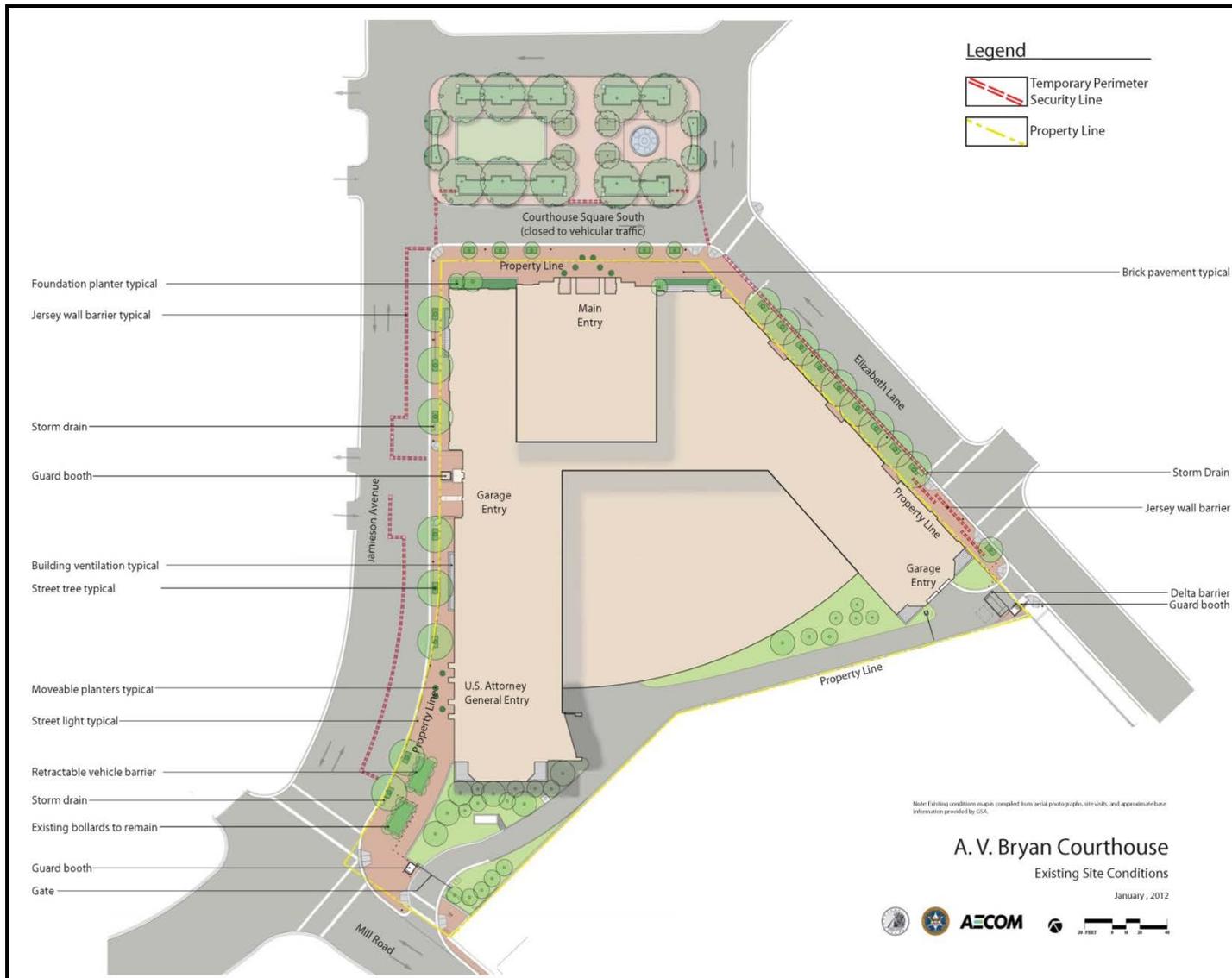


Figure 1-3: Existing Conditions Plan
Source: AECOM 2011



Figure 1-4: Temporary Perimeter Security Measures

Source: AECOM 2011

1.2 WHAT IS THE PURPOSE OF AND NEED FOR THE A.V. BRYAN COURTHOUSE PERIMETER SECURITY IMPROVEMENTS?

The purpose of the proposed action is to provide the required level of protection for the A.V. Bryan Courthouse, while enhancing the quality of the public realm. Temporary security elements, including Jersey barriers and planters, currently surround the building on three sides, impacting the building's visual environment and pedestrian and vehicular circulation in the surrounding area.

The permanent perimeter security measures are necessary in order to meet the security requirements for the tenants and the building. USMS and GSA developed the security measures in accordance with the Interagency Security Committee (ISC) Security Design Criteria. The ISC Security Design Criteria require that security measures be based on a building-specific risk assessment resulting in a level of protection. The level of protection is determined by tenant mission, adjacent facilities and targets, significance of the facility, and building size and location. The security measures were developed to meet the agency's need within the confines of the building's tightly defined urban setting and to respect the interests of neighboring property owners, nearby residents, and pedestrians. Permanent perimeter security measures are also necessary in order to allow for the removal of the existing Jersey barriers that surround the building.

1.3 WHAT RESOURCE ISSUES ARE CONSIDERED IN THIS DOCUMENT?

This EA has been prepared to evaluate the potential impacts of the perimeter security improvements on the following resources:

- Land use and planning policies
- Public space
- Visual resources
- Vegetation
- Stormwater management
- Vehicular and non-vehicular transportation and parking
- Noise
- Sustainability

1.4 WHAT RESOURCE ISSUES HAVE BEEN ELIMINATED FROM DETAILED ANALYSIS?

Several issues were initially considered for evaluation in this EA, but were eliminated from detailed study because short- and long-term direct and indirect impacts would be negligible. These issues, and the rationale for their elimination, are provided below:

Economic and Fiscal Resources – The proposed action would not alter economic conditions in the area or affect fiscal resources. Thus, this topic was dismissed from detailed analysis.

Community Facilities – The proposed action would not increase or decrease the population of the area, or change the current residents' access to community facilities. Thus, there would be negligible impacts to this resource area.

Demographics and Environmental Justice – Although there are residential populations in the immediate vicinity of the site, the proposed action would not impact the area’s demographic composition. Environmental Justice populations would not be directly affected by the proposed action, and it is highly unlikely that the project would introduce materials into the environment that would have indirect adverse health effects or impact the economic conditions of low income populations. Thus, Demographics and Environmental Justice were eliminated from detailed analysis.

Archaeological Resources - In 1993, prior to the construction of the Courthouse, Phase I, Phase II and Phase III archaeological investigations were carried out at the project site by Engineering-Science, Chartered. These studies documented both prehistoric and historic occupation of the project site. Due to the exhaustive survey of the site in the 1990s, the City of Alexandria has concluded that the perimeter security improvements would have no effect on archaeological resources.

Historic Resources - No historic properties lie within the immediate vicinity of the site. Given the property’s tightly defined urban context, and thus limited visibility, impacts to historic resources as a result of the perimeter security improvements would be negligible. The City of Alexandria has concurred with this determination. In addition, in a January 19, 2012 letter from Andrea Kampinen, the Virginia Department of Historic Resources concurred that no historic properties would be affected by the proposed project (see Appendix B). GSA has thus met its obligations under Section 106 of the National Historic Preservation Act.

Wildlife – Wildlife at the A.V. Bryan Courthouse is limited to urban species. While these species could be temporarily dispersed during

construction, urban wildlife would be expected to return to the site once construction is complete.

Climate Change – Due to the fact that the proposed project would not increase employees or vehicles traveling to the site, and due to the limited construction required for the perimeter security improvements, the proposed action is not anticipated to substantively impact climate change or greenhouse gas emissions.

Hazardous Materials – The A.V. Bryan Courthouse is not a current generator of hazardous wastes and hazardous substances are not known to exist on the project site. While there are two hazardous waste facilities, several voluntary remediation program (VRP) sites, and several petroleum release sites in the vicinity of the courthouse, the proposed action would be confined to the courthouse site and the right-of-ways surrounding it and thus would not affect these sites. If it is necessary to remove soils from the site, these soils would be tested and disposed of in accordance with applicable Federal, State, and local laws and regulations. GSA would characterize all construction and demolition debris in accordance with the Virginia Hazardous Waste Management Regulations prior to disposal at an appropriate facility.

Utilities – The proposed security improvements would not increase the demand for utility services at the site, and thus there would be no long-term impacts to utilities. GSA would coordinate with local utility providers to minimize disturbance to utility lines within and immediately surrounding the property during construction. GSA previously coordinated with the Alexandria Fire Department regarding the opening of Courthouse Square South. GSA will continue to coordinate with the Department as the detailed design progresses to ensure access is maintained to the fire hydrants and the building

including fire truck turning radii. Thus, impacts to utility services would be negligible.

Air Quality - Construction activities have the potential to produce dust and result in short-term increases in vehicle emissions in the vicinity of the proposed site. However, the production of dust and the increase in vehicle emissions would be minimal due to the size and scope of the construction activities and would be temporary in nature (only during construction). To minimize potential effects, Best Management Practices (BMP) would be used during construction, including the employment of appropriate dust suppression methods, the utilization of low sulfur fuels for construction equipment, and the implementation of a construction management plan to minimize interference with motor vehicle traffic. The project is not anticipated to require open burning. Thus, short-and long-term impacts would be negligible.

Under the proposed action, future activities conducted at the courthouse would be similar in scope to activities currently being conducted, and would not result in new sources of long-term emissions. Therefore, the proposed action has no potential to cause long-term impacts to air quality in the City of Alexandria. The proposed action is exempt from the General Conformity Rule (Title 40 C.F.R. § 93.153(c)(2)(x)), as it would result in an increase in emissions that would be de minimis.

Floodplains and Wetlands – The A.V. Bryan Courthouse lies within a densely developed urban area. Field survey has indicated that there are no wetlands on the site or within the immediate area. According to the FEMA Flood Insurance Rate Map (Map Number 5155190037E, revised June 16, 2011), the building is located in Zone X (unshaded), an area of minimal flood hazard, usually depicted as above the 500-year flood

level. As a result, impacts to floodplains and wetlands would be negligible.

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2.0 ALTERNATIVES

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2.1 WHAT ALTERNATIVES WERE INITIALLY CONSIDERED BUT DISMISSED?

This EA evaluates in detail an Action Alternative and a No Action Alternative. GSA and USMS also considered an additional alternative for perimeter security that maintained the width of the existing planting bed on Jamieson Avenue, adding a rated planter wall to serve a perimeter security function. This alternative would have required that the building ventilation system be adjusted to accommodate the new grade on Jamieson Avenue, and would not have allowed for the preservation of the existing mature trees. In addition, the use of a rated planter wall would have resulted in more intense visual impacts. As such, this alternative was dismissed from detailed analysis.

2.2 WHAT IS THE ACTION ALTERNATIVE?

Under the Action Alternative, permanent perimeter security elements would be constructed along Jamieson Avenue, Courthouse Square South, and Elizabeth Lane on property owned by the Carlyle Community Council (Figure 2-1). In order to achieve this, GSA would need to enter into an agreement with the CCC on the occupation of the property and coordinate with the City of Alexandria prior to any construction.

On Jamieson Avenue, a hardened garden fence would be installed between the face of the building and the inside of the sidewalk (Figure 2-2). The existing planting bed would be widened, allowing for the potential preservation of the six mature street trees. The garden fence would be a minimum of 30" high and stepped with the building to accommodate the change in grade. The Jamieson Avenue curblin would be moved to the west, allowing for the expansion of the public realm; the area between the face of the building and the curblin would increase from approximately 13 feet to approximately 29.5 feet wide. The narrowing of the roadway would require the relocation of the

stormdrains along the roadway. In addition, the Delta barrier near the intersection of Jamieson Avenue and Mill Road would be removed. At the garage entry, a line of retractable/removable bollards would run between the garage and the curblin. The existing Delta barriers at the entry would be maintained as a secondary security measure.

Courthouse Square South is currently closed to vehicular traffic. Under the Action Alternative, the roadway width would be narrowed approximately 10 feet to allow for the expansion of the public realm in front of the courthouse, the road would be reopened to vehicular traffic, and a raised crosswalk would be installed to provide a connection to the park to the east. In addition, a combination of hardened garden fence panels and bollards would be installed approximately three feet from the curblin to serve a security function (Figures 2-3 and 2-5). The fence panels would enclose expanded tree boxes for the street trees and low plantings. The bollards and fence panels would be a minimum of 30" high and would allow for four feet of clearance between the elements. The existing planting bed along the face of the building would be maintained and street trees would be planted that would frame the building's primary entrance.

On Elizabeth Lane, a line of ornamental fence panels and bollards would be installed just inside of the existing curb, and a consistent line of street trees would be established (Figure 2-4).

In conjunction with the perimeter security improvements, the City of Alexandria would reconfigure the intersection of Mill Road and Jamieson Avenue. Improvements at this intersection would be implemented concurrently with or following the implementation of the perimeter security improvements at the A.V. Bryan Courthouse. Under the proposed road improvements, the northbound through-travel/left-turn lane on Mill Road south of the intersection would be converted to

a through-travel/right-turn lane, resulting in double right-turn lanes onto eastbound Jamieson Avenue. Jamieson Avenue east of the intersection would be reconfigured to include two eastbound travel lanes, which would narrow to a single lane prior to the entrance to the courthouse's underground parking garage. The Jamieson Avenue improvements would also include a combined westbound through-travel lane/right-turn lane onto northbound Mill Road, a center westbound through-travel lane, and a dedicated left-turn lane onto southbound Mill Road. After PM peak hours, the curbside westbound through-travel/right-turn lane on Jamieson Avenue would be used for parking (Symmetra Design, 2012).

2.3 WHAT IS THE NO ACTION ALTERNATIVE?

Under the No Action Alternative, the perimeter security improvements would not be undertaken (Figure 1-3). The existing temporary security measures, including Jersey barriers and planters, would remain in place and Courthouse Square South would remain closed to vehicular traffic.



Figure 2-1: Action Alternative

Source: AECOM 2011

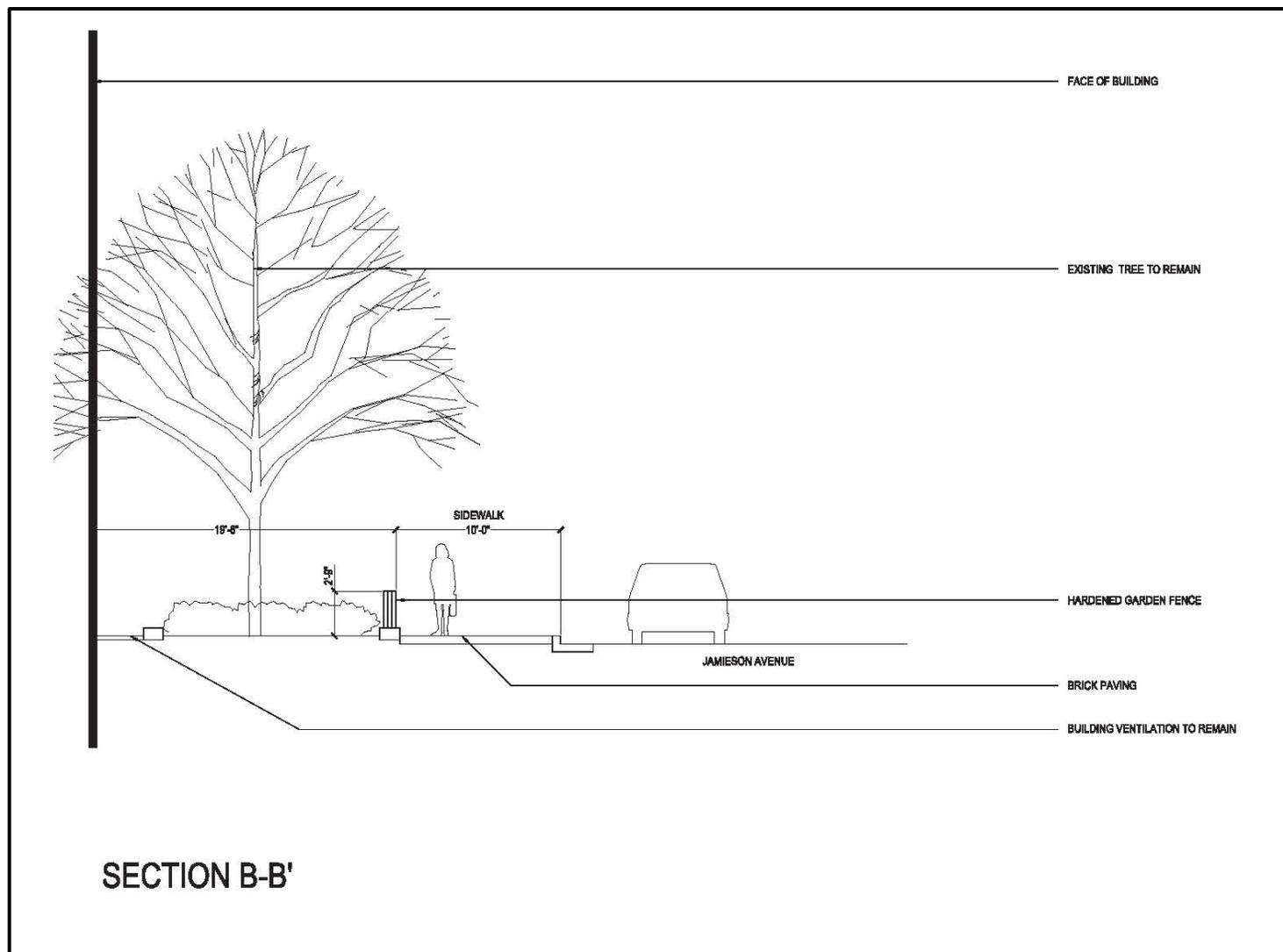


Figure 2-2: Section on Jamieson Avenue
Source: AECOM 2011

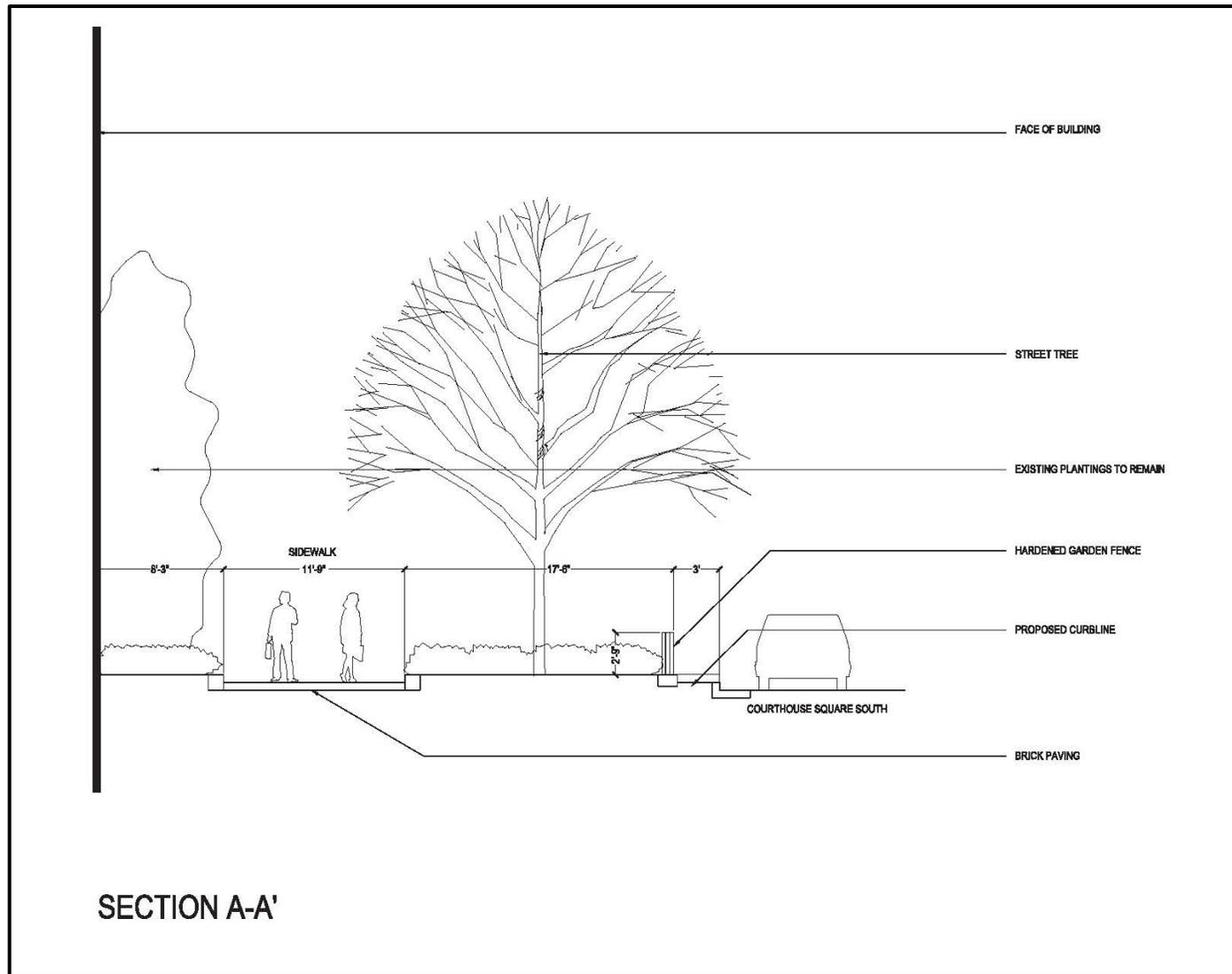


Figure 2-3: Section on Courthouse Square South
Source: AECOM 2011

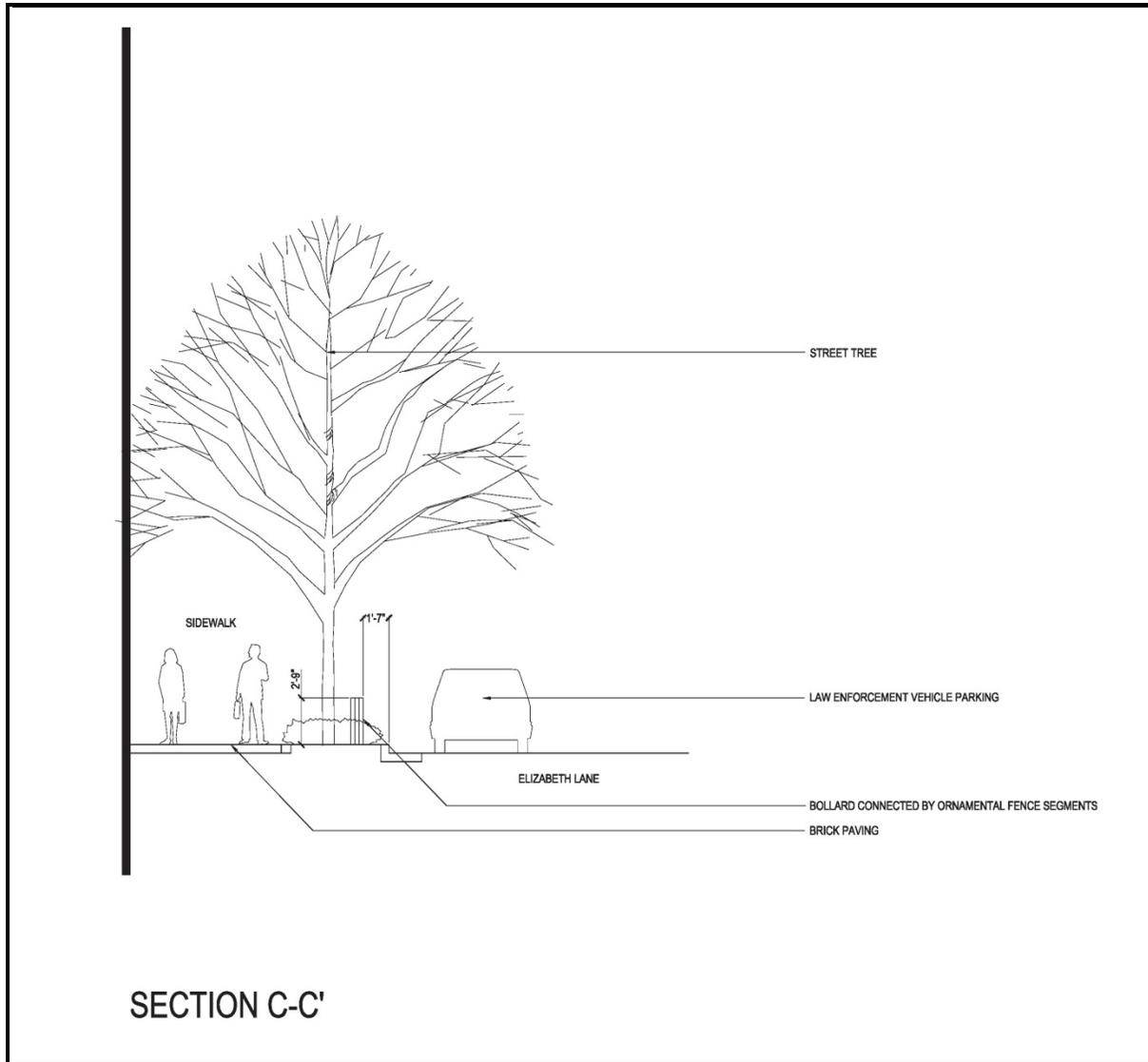


Figure 2-4: Section on Elizabeth Lane

Source: AECOM 2011

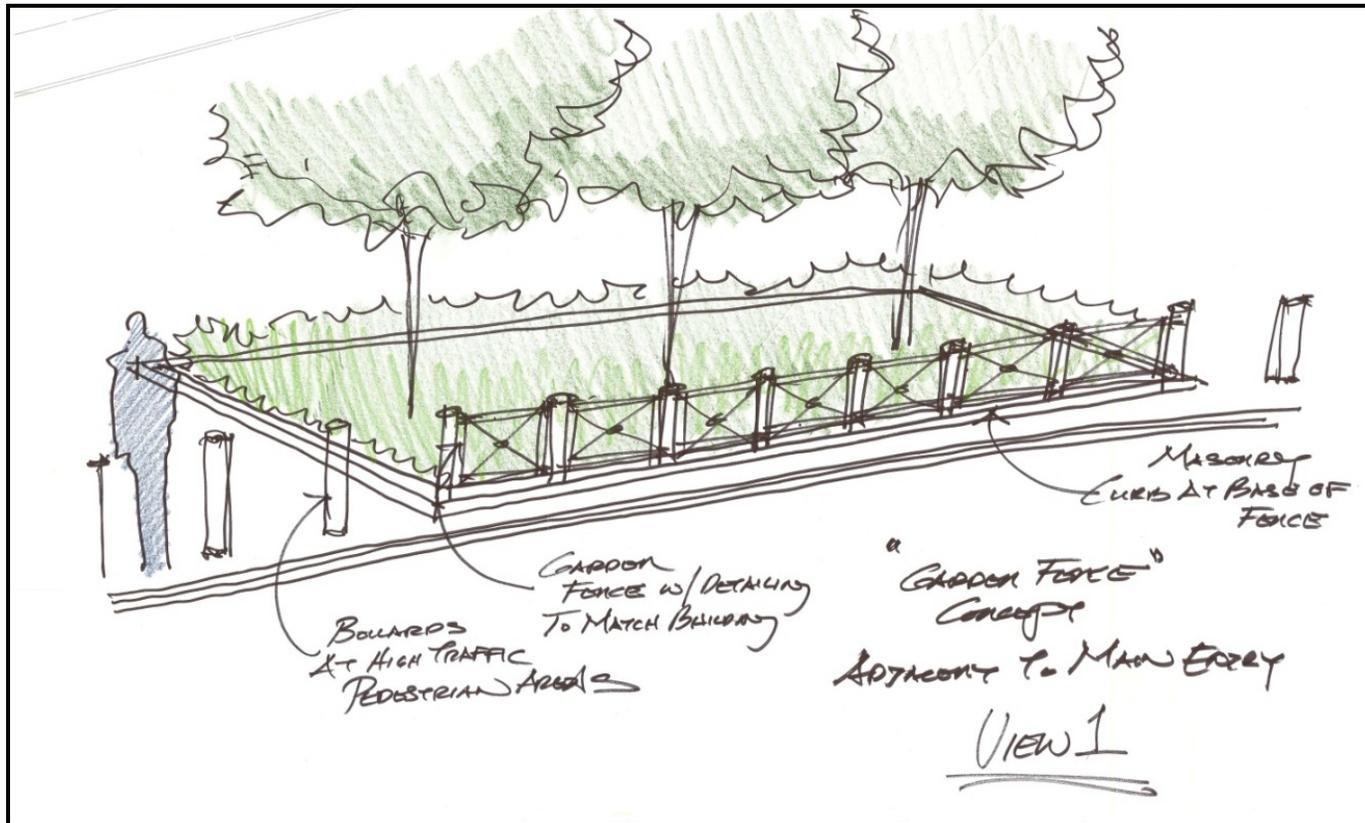


Figure 2-5: Perspective at Courthouse Square South

Source: AECOM 2011

2.4 HOW DO THE ALTERNATIVES COMPARE WITH EACH OTHER?

The following table (Table 2-1) summarizes each alternative's impacts on the resources studied within this Environmental Assessment. Detailed analysis is included in Chapter 3.

Table 2-1: Comparison of Impacts		
Resource	Action Alternative	No Action Alternative
Land Use and Planning Policies	<i>Land Use:</i> Negligible short-and long-term impacts; negligible cumulative impacts <i>Planning Policies:</i> Minor adverse and beneficial impacts	<i>Land Use:</i> Negligible impacts <i>Planning Policies:</i> Negligible impacts
Public Space	Minor adverse and beneficial impacts; negligible cumulative impacts	Negligible impacts but would continue adverse conditions
Visual Resources	Beneficial impacts; negligible cumulative impacts	Negligible impacts but would continue adverse conditions
Vegetation	Long-term and cumulative impacts beneficial impacts	Negligible impacts
Stormwater Management	Minor short-term adverse impacts and long-term beneficial impacts; minor cumulative impacts	Negligible impacts

Resource	Action Alternative	No Action Alternative
Vehicular and Non-Vehicular Transportation and Parking	<p><i>Vehicular Circulation:</i> Minor short-term adverse impacts, and minor long-term adverse and long-term beneficial impacts; minor short-term cumulative impacts</p> <p><i>Parking:</i> Negligible impacts</p> <p><i>Pedestrian Circulation:</i> Minor short-term adverse impacts and beneficial long-term impacts; minor short-term cumulative impacts</p> <p><i>Public Transportation:</i> Minor short-term adverse impacts and minor short-term cumulative</p>	<p><i>Vehicular Circulation:</i> Minor long-term adverse and beneficial impacts</p> <p><i>Parking:</i> Negligible impacts</p> <p><i>Pedestrian Circulation:</i> Negligible impacts, but would continue adverse conditions</p> <p><i>Public Transportation:</i> Negligible impacts</p>
Noise	Short-term minor adverse impacts and negligible long-term impacts; minor cumulative impacts	Negligible impacts
Sustainability	Beneficial long-term and cumulative impacts	Negligible impacts

2.5 WHAT IS GSA'S PREFERRED ALTERNATIVE AND WHY WAS IT SELECTED?

GSA's Preferred Alternative is the Action Alternative as it best meets the purpose and need for the action by providing the necessary level of permanent perimeter security at the courthouse. In addition, it would allow for the expansion of public space along Jamieson Avenue and Courthouse Square South, and a better connection between the main entrance of the courthouse and the park to the northeast. Finally, it would allow for the reopening of Courthouse Square South, facilitating better vehicular circulation patterns in the surrounding neighborhood, and would accommodate planned improvements on Jamieson Avenue.

3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL IMPACTS

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3.1 WHAT IS THE AFFECTED ENVIRONMENT AND HOW ARE IMPACTS EVALUATED?

The affected environment describes the existing social and environmental resources that may be impacted by the proposed alternatives. As documented in Chapter 1, Section 1.4, resources that are not likely to be impacted by the alternatives have been dismissed from detailed analysis.

In the following analysis, impacts are characterized by several factors including intensity, type, and duration. Definitions of these terms and related assumptions are provided below:

Intensity – The intensity of an impact describes the magnitude of change that the impact generates. The intensity thresholds are as follows:

- **Negligible:** There would be no impact, or the impact would not result in a noticeable change in the resource;
- **Minor:** The impact would be slight, but detectable, resulting in a small but measurable change in the resource;
- **Moderate:** The impact would be readily apparent and/or easily detectable;
- **Major:** The impact would be widespread and would substantially alter the resource. A major adverse impact would be considered significant under NEPA.

Type – The impact type refers to whether it is adverse (negative) or beneficial (positive). Adverse impacts would potentially harm resources, while beneficial impacts would improve resource

conditions. Within the analysis, impacts are assumed to be adverse unless identified as beneficial.

Duration – The duration of an impact identifies whether it occurs over a restricted period of time (short-term), or persists over a longer period (long-term). For the purposes of this analysis, it is assumed that short-term impacts would occur during the construction of the improvements, while long-term impacts would persist once the construction is complete.

In addition to the factors detailed above, impacts may be characterized as direct, indirect, or cumulative. A direct impact is caused by the action and occurs at the same time and place. An indirect impact is caused by the action, but occurs later in time, or farther removed in distance. A cumulative impact occurs when the proposed action is considered together with other past, ongoing, or planned actions.

3.2 LAND USE AND PLANNING POLICIES

3.2.1 What Land Uses are Present on the Site and Within the Surrounding Area?

The A.V. Bryan Courthouse is located in the Carlyle District in the southeastern portion of the City of Alexandria. The Carlyle District is a mixed-use urban area that was developed in the 1990s on the site of a former rail yard. The A.V. Bryan Courthouse is owned by GSA and houses the U.S. District Court for the Eastern District of Virginia and offices of the U.S. Attorney, U.S. Marshals Service, Federal Public Defender, and U.S. Probation Office. The courthouse occupies approximately two acres on the northern end of the block bounded by Courthouse Square South to the northeast, Elizabeth Lane to the east, Eisenhower Avenue to the south, Mill Road to the west, and Jamieson

Avenue to the northwest. Jamieson Avenue and Elizabeth Lane provide access to employee parking.

The area immediately surrounding the A.V. Bryan Courthouse is characterized by a mixture of medium-rise commercial and residential buildings. Carlyle Towers, a private condominium development comprised of three 20-story towers, occupies the equivalent of three city blocks directly north of the courthouse across Jamieson Avenue. Courthouse Square, a small urban park with a fountain and seating, lies directly northeast of the courthouse, across Courthouse Square South. Additional uses within the surrounding area include two hotels, several office buildings with ground floor retail, and parking garages. The Eisenhower Avenue Metrorail Station lies several blocks southwest of the project site.

3.2.2 How Would Land Uses be Affected by the Perimeter Security Improvements?

Action Alternative

The Action Alternative would neither change the character of existing land uses in the area, nor would it introduce any new and/or incompatible uses. Thus, there would be negligible short- and long-term impacts to land use.

No Action Alternative

Under the No Action Alternative, land uses on and immediately surrounding the A.V. Bryan Courthouse would not change. Thus, there would be negligible impacts to land use as a result of the No Action Alternative.

3.2.3 What are the Federal and Local Plans and Policies that are Relevant to the Perimeter Security Improvements?

Comprehensive Plan for the National Capital: Federal Elements (2004)

The *Comprehensive Plan for the National Capital: Federal Elements* is the principal tool used by the National Capital Planning Commission (NCPC) to guide the planning of federal facilities in Washington, DC and the surrounding region. The Comprehensive Plan is comprised of goals, objectives, and policies intended to guide growth and development in the National Capital Area. The Federal Workplace Element and the Federal Environment Element are of particular relevance to the proposed perimeter security improvements.

The Federal Workplace Element states that it is the goal of the federal government in the National Capital Region to: “Locate the federal workforce to enhance the efficiency, productivity, and public image of the federal government,” and “to strengthen the economic well-being and expand employment opportunities of the region and the localities therein.” Policies that are relevant to the perimeter security improvements at the A.V. Bryan Courthouse include the following:

- Consult with local agencies to ensure that federal workplaces enhance the design qualities and vitality of their communities.
- Incorporate security needs into the design of buildings, streetscapes, and landscapes using urban design principals in a manner that: enhances and beautifies the public realm, resulting in coherent and welcoming streetscapes; does not excessively restrict or impede operational use of sidewalks or pedestrian, handicap, or vehicular mobility; and does not impact the health of existing mature trees.

- Design projects in a manner that does not impede commerce and economic vitality, but balances the need for perimeter security with the need to enhance and maintain the vitality of urban areas.
- Design security barrier lines and elements that complement and enhance the character of the area in which they will be located and that respect the historic context of the area when applicable.
- Design security elements to respond to site-specific conditions, such as vehicle approach speed and angles, in order to minimize the size of security elements when possible.
- Agencies requiring physical perimeter security improvements should design such improvements in accordance with guidance included in The National Capital Urban Design and Security Plan (and related policies).

The Federal Environment Element states that it is the goal of the federal government to: “Conduct its activities and manage its property in a manner that promotes the National Capital Region as a leader in environmental stewardship.” Policies in support of this goal that are directly applicable to the A.V. Bryan Courthouse site improvements include the following:

- Use pervious surfaces and retention ponds to reduce stormwater runoff and impacts on off-site water quality.
- Encourage the use of innovative and environmentally friendly “Best Management Practices” in site and building design and construction practice, such as green roofs, rain gardens, and permeable surface walkways, to reduce erosion and avoid pollution of surface waters.

- Encourage the natural recharge of groundwater and aquifers by limiting the creation of impervious surfaces, avoiding disturbance to wetlands and floodplains, and designing stormwater swales and collection basins on federal installations.
- Encourage the implementation of water reclamation programs at federal facilities for landscape irrigation purposes and other appropriate uses.
- Incorporate new trees and vegetation to moderate temperatures, minimize energy consumption, and mitigate stormwater runoff.
- Encourage the use of native plant species, where appropriate.

National Capital Urban Design and Security Plan Objectives and Policies (2005)

The *Urban Design and Security Plan Objectives and Policies* was adopted by NCPC in 2005 to clarify issues related to contextual design, vehicular and pedestrian controls, and the placement and design of physical security elements as outlined within the 2002 *Urban Design and Security Plan*. The objectives and policies are intended to be used to guide federal agencies when evaluating, planning, and designing proposed perimeter security projects.

The objectives and policies include the following:

- Strike a balance between physical perimeter security for federal buildings and the vitality of the public realm.
- Intelligence information, operational controls, and physical design measures should be used to protect against vehicle-borne explosives.

- The placement of physical security barriers in public space is discouraged and should be minimized.
- For existing buildings in urban areas, perimeter security barriers should be located within the building yard when the face of the sensitive building to the outside edge of the building yard is a minimum of 20 feet.
- Perimeter security barriers at intersections, corners and near crosswalks or other highly used pedestrian areas should be minimized; barriers that are needed should be located to allow safe pedestrian waiting areas and pedestrian movement.
- The design of security barriers, including their mass, form and materials should respond to the architectural and landscape context in which they are located and complement and aesthetically enhance the special character of the associated building and precinct.
- Perimeter security barriers in public space should incorporate decorative tree wells, planters, light poles, signage, benches, parking meters, trash receptacles and other elements and public amenities typically found in a streetscape.

Zoning

The A.V. Bryan Courthouse is located within the City of Alexandria's Duke Street Coordinated Development District (CDD), also known as CDD #1. The CDD zone promotes development consistent with the master plan. Sites that are zoned CDD are intended for a mix of uses, including office, residential, retail, and other uses with appropriate open space and recreational amenities. A CDD zone is intended to encourage cooperation and joint planning where there are multiple owners in the CDD zoned area. A review process is established to ensure that such developments exhibit a proper integration of uses, the highest quality of urban and architectural design and harmony with the

surrounding areas of the city. The CDD does not provide guidance specifically relevant to perimeter security projects.

Eisenhower East Small Area Plan

The City of Alexandria's Master Plan is made up of 16 Small Area Plans (SAP), neighborhood master plans, and corridor plans covering neighborhoods throughout the City. The A.V. Bryan Courthouse and its immediate surroundings are included within the 230-acre planning area covered by the *Eisenhower East* SAP, which was adopted by the Alexandria City Council in April 2003. The focus of the plan is largely on the portion of the Eisenhower Avenue corridor that traverses the planning area. Topics addressed in the plan that are generally relevant to the proposed action include enhancing pedestrian circulation, providing attractive and welcoming open and public spaces, and incorporating unified urban design elements that help define the area's character.

3.2.4 Would the Improvements Comply with Federal and Local Plans and Policies?

Action Alternative

The perimeter security improvements would generally comply with the *Federal Elements of the Comprehensive Plan for the National Capital* by integrating the courthouse into its context by implementing streetscape and security elements that complement and reflect the character of the surrounding Carlyle District; by installing security elements that do not excessively restrict the use of nearby sidewalks and public spaces; and by coordinating with the City of Alexandria throughout the design process. In addition, implementation of the proposed action would comply with the *Federal Elements* by increasing

the size of the planting beds and tree boxes and by reducing the amount of impervious surfaces around the courthouse, thereby reducing stormwater runoff.

The Action Alternative would comply with portions of the *NCPC Security Objectives and Policies*. The design would employ a range of streetscape elements including garden fence panels and bollards. The *NCPC Security Objectives and Policies* allow for barriers in public space if the distance from the face of the building to the outer edge of the building yard is less than 20 feet, but also states that the placement of barriers in public space is discouraged and should be avoided. On each of three rights-of-way, the building yard is less than 20 feet or one does not exist, and thus the placement of security features along the curblines, while discouraged, may still be allowed. The *NCPC Security Objectives and Policies* also discourage the placement of security elements at corners, as they inhibit pedestrian flow. Although bollards would be located at the corners of the street intersections, they would be placed to minimize barriers to pedestrian access.

The perimeter security improvements would reflect the recommendations of the *Eisenhower East Small Area Plan* by enhancing and encouraging pedestrian circulation, and by creating more welcoming and attractive public spaces.

Overall, there would be minor adverse impacts due to the placement of security elements at corners contrary to the *NCPC Security Objectives and Policies*, with beneficial impacts resulting from enhancing public space in accordance with the *Eisenhower East Small Area Plan* and the reduction in impervious surface and increase in vegetation in accordance with the *Federal Elements*.

No Action Alternative

Under the No Action Alternative, permanent perimeter security elements would not be installed and the existing temporary measures would remain. Opportunities to reduce impervious surface, increase vegetation, and reduce stormwater runoff, as recommended by the *Federal Elements*, would be lost. In addition, the public realm would not be improved. Therefore, there would be negligible impacts to plans and policies.

3.3 PUBLIC SPACE

3.3.1 What is Public Space and What Plans and Policies Guide its Use and Design?

Use and design of public space in the Carlyle District is primarily guided by the *Carlyle Streetscape Design Guidelines*. Public space is referenced in the *Carlyle Streetscape Design Guidelines* as “right-of-way”, which is the public dedicated portion of the street, including the street surface (street right-of-way) and the pedestrian area between the curb and the building streetwall. Provisions of the guidelines apply to all development and construction in the open spaces, street rights-of-way, and sidewalk and landscape easements within the Carlyle District. The design guidelines were approved by the Alexandria City Council in 1997 and amended in 1998, and are intended to “ensure high quality, integrated, compatible development while allowing flexibility over time to address changing development needs.” Under the guidelines, all site and building development plans are reviewed by the Carlyle Design Review Board for conformance with design requirements.

Per the conditions of an easement established under the Carlyle District SAP, the City of Alexandria is responsible for maintaining the sidewalks and street surfaces within the public right-of-way. Parcel owners are responsible for installing all streetscape improvements in the public right-of-way from the back of the curb to the property line, and in the sidewalk and landscape easements. Landscaping within the public right-of-way is maintained by the Carlyle Property Owners Association.

The guidelines prescribe general design requirements that apply uniformly to the Carlyle District as a whole, and more specific requirements for each of the District’s six individual precincts. The

guidelines regulate orientation of buildings to the street, placement of building entrances, vehicular access zones, sidewalk paving materials and patterns, streetlights, street trees, plantings, and street furniture.

The A.V. Bryan Courthouse is located with Carlyle’s Jamieson Precinct. The courthouse’s property line is variable in relation to the building around its perimeter, and is shown in Figure 1-3. The existing sidewalks are each located outside of the property line, and thus within public space controlled by the Carlyle Community Council.

3.3.2 How Would Public Space be Affected by the Perimeter Security Improvements?

Action Alternative

Perimeter security elements would be installed within both the building property line and the public right-of-way along Jamieson Avenue, and wholly within the public right-of-way adjacent to Elizabeth Lane and Courthouse Square South (see Figure 2-1). Although the perimeter security improvements have the potential to impact pedestrian flow along area sidewalks, the public space would be enhanced through the expansion of existing planting beds and tree boxes, and through the removal of the existing Jersey barriers that impact the building’s visual environment. The permanent measures would not extend further than the existing temporary security features, and thus they would not increase the vulnerability of pedestrians on adjacent sidewalks or within nearby buildings. The design for the perimeter security improvements would comply with the *Carlyle Streetscape Design Guidelines*, and the detailed design would be reviewed by both the City of Alexandria and the Carlyle Design Review Board.

Overall, there would be minor adverse impacts to public space due to the potential restriction of pedestrian flow on area sidewalks, with beneficial impacts resulting from the removal of the temporary security measures and their replacement with permanent measures that are consistent with surrounding streetscape design.

No Action Alternative

Under the No Action Alternative, there would be no changes to public space. The existing temporary security measures that are visually inconsistent with their surroundings would remain, but there would be no further deterioration to this resource area. Overall, impacts would be negligible.

3.3.3 What Measures Should be Undertaken to Reduce Impacts to Public Space?

To ensure uniformity with urban design elements in the Carlyle District and the Jamieson Precinct, the design of the perimeter security improvements would be subject to the approval of the Carlyle Design Review Board, in conformance with the *Carlyle Streetscape Design Guidelines*.

3.4 VISUAL RESOURCES

3.4.1 What is the Visual Character of the Site and the Surrounding Area?

Due to the urban density of the Carlyle District, views are generally afforded along the streets that border the courthouse, including Jamieson Avenue, Courthouse Square South, and Elizabeth Lane. The following discussion characterizes the three public sides of the building and the associated view corridors along the streets and associated sidewalks.

Jamieson Avenue

Jamieson Avenue borders the A.V. Bryan Courthouse to the northwest. The two-lane thoroughfare is defined on both sides by buildings of varying heights set close to the roadway (Figure 3-1). Adjacent to the courthouse building, Jersey barriers line the edge of the roadway, jutting out at the garage entry. These barriers appear as a bulky mass, visually and physically dividing the right-of-way from the pedestrian realm. Directly across Jamieson Avenue to the north, Carlyle Towers is comprised of a series of low-rise buildings that front on Jamieson Avenue, with three high-rise towers set back slightly behind gates and

small plazas. Views along the corridor are framed by mature street trees. From the south end of the block, views to the northeast are partially obscured due to the slope of the roadway. Views along the corridor ultimately terminate several blocks from the courthouse at a mid-rise commercial building. This is due to the curve of the right-of-way. To the southwest, views terminate at a mid-rise commercial building at the intersection of Jamieson Avenue and Mill Road.



Figure 3-1: View Southwest on Jamieson Avenue
Source: AECOM 2011

Courthouse Square South

Courthouse Square South is a one-way one block thoroughfare that is currently closed to vehicular traffic due to temporary perimeter security measures put in place. The roadway is lined by small street trees adjacent to the courthouse and mature shade trees within Courthouse Square to the northeast (Figure 3-2). Jersey barriers block both ends of the roadway, and several barriers lie along the northeast side of the roadway adjacent to the park. These appear as visual obstructions within the streetscape. In addition, a series of temporary planters are located in front of the main ceremonial entry. Views along the corridor are framed by trees and terminate at mid- to high-rise buildings to the northeast and southwest. Views of the main entrance to the A.V. Bryan Courthouse are afforded from Courthouse Square, but are filtered through trees and partially obstructed by Jersey barriers.



Figure 3-2: View Northwest on Courthouse Square South
Source: AECOM 2011

Elizabeth Lane

Elizabeth Lane is a two lane right-of-way that borders the courthouse to the east (Figure 3-3). Mid-rise buildings, including the A.V. Bryan Courthouse, line both sides of the roadway, and adjacent sidewalks are narrow and bordered by small street trees. Jersey barriers run along the edge of sidewalk on the west side, narrowing the walking space and physically and visually dividing the pedestrian space from the right-of-way. The line of barriers breaks at the south end of the courthouse due to the garage entry. Views along the corridor are framed by the street trees, terminating to the north at the Westin Hotel and to the south at a three-story parking garage.



Figure 3-3: View South on Elizabeth Lane
Source: AECOM 2011



3.4.2 How Would Key Viewsheds be Affected by the Project?

Action Alternative

Views Along Jamieson Avenue

Under the Action Alternative, the temporary security measures, including Jersey barriers and planters, would be removed. The area of usable public space would be expanded through the movement of the curbline to the northwest and the elimination of the lane currently enclosed by the Jersey barriers. Two new planting beds, one on each side of the garage entry, would be established, centered upon the existing mature willow oak trees. A hardened garden fence would run along the edge of the new planting beds, and would step down at intervals as the ground slopes to the southwest.

Looking northeast along the roadway, the parked cars would be eliminated on the southeast side of the road and the sidewalk would be open and backed by a garden fence, mature trees, and new plantings. Looking southwest along the corridor, views would be similar, with the new wide sidewalk backed by trees and a green planting bed. Views along the sidewalk would change substantially, as the solid Jersey barriers that physically and visually divide the right-of-way from the public realm would be eliminated, and new planting would be established at the base of the building. Overall, impacts would be beneficial, due to the enhancements to the public realm and the elimination of the temporary security measures.

Views Along Courthouse Square South

On Courthouse Square South, the existing Jersey barriers and temporary planters would be removed and the public space between the building and road would be expanded through the narrowing of the

right-of-way. The street trees would be replaced, and large tree boxes would be installed on either side of the main entry. These expanded boxes would allow for plantings at the base of the trees, creating a strong green edge between the sidewalk and the roadway. Hardened garden fence panels would be installed on the curb side of the tree boxes, and a line of bollards would span the space between them. Bollards would also be installed at the corners connecting to the sidewalks at Jamieson Avenue and Elizabeth Lane.

Looking in each direction along the right-of-way, views would improve due to the elimination of the Jersey barriers at either end of the roadway and along the edge of Courthouse Square. In addition, the new street trees and plantings within the tree boxes would establish a strong green edge that would mirror the vegetation within Courthouse Square. Although the bollards and fence panels would divide the public realm from the roadway, they would be visually porous. Overall, impacts would be beneficial due to the removal of the Jersey barriers and the greening of the public realm.

Views Along Elizabeth Lane

On Elizabeth Lane, the existing Jersey barriers that physically and visually divide the sidewalk from the roadway would be removed. The existing street trees, all small specimens, would be replaced with a consistent line of street trees backed by bollards and ornamental fence segments. At the south end of the property, near the garage entry, a line of bollards would be installed along the curbline, replacing the existing Jersey barriers. Looking north and south along the right-of-way and the sidewalk, the new fence panels and bollards would appear porous, allowing for a visual connection between the right-of-way and the sidewalk. Overall, impacts to views on Elizabeth Lane would be beneficial.

No Action Alternative

Under the No Action Alternative, there would be no changes to the site. The existing temporary security measures that obstruct the visual relationship between the sidewalk and the adjacent roadway would negatively impact the visual environment, but would not further deteriorate this resource area. Overall, impacts would be negligible.

3.5 VEGETATION

3.5.1 What Type of Vegetation is Located at the A.V. Bryan Courthouse?

Vegetation around the A.V. Bryan Courthouse was inventoried through site visits. The vegetation at the site is limited, consisting of street trees on the three sides of the building, and modest landscaped beds adjacent to the main entrance on Courthouse Square South (Figure 3-4). Along Jamieson Avenue, six mature willow oaks (*Quercus phellos*) are located between the sidewalk and the curblin northeast of the U.S. Attorney's entry, while an additional two are located southwest of the entry. The trees have small clumps of liriop (*liriop muscari*) planted at their bases. Further southwest, at the intersection with Mill Road, there are two small planting beds and a third larger one. The smaller beds each contain three saucer magnolia (*Magnolia x soulangiana*) and liriop. The southernmost bed also contains a *Euonymus fortune* (*Euonymus fortunei coloratus*). The larger bed contains willow oak and burning bush (*Euonymus alatus*). On Courthouse Square South, there are five small American basswood (*Tilia americana*) along the curblin and four larger European hornbeams, Japanese holly (*Ilex crenata*), and liriop in narrow planting beds that flank the main entrance of the building. Seventeen small sugar maples (*Acer saccharum*) run along the curblin on

Elizabeth Lane; small clumps of liriop are planted at the base of the trees.



Figure 3-4: Willow Oak Trees on Jamieson Avenue
Source: AECOM 2011

3.5.2 How Would Vegetation be Affected by the Project?

Action Alternative

Under the Action Alternative, two large planting beds would be installed between the face of the building and the sidewalk on Jamieson Avenue, one on either side of the garage entry. Every effort would be made to maintain the six mature willow oaks northeast of the U.S. Attorney's entry. The willow oak located closer to Mill Road would be removed, while an additional tree would be added to frame the U.S. Attorney's entry. Low plantings would be established in the new beds adjacent to the face of the building. The plantings in the beds at the southwest end of Jamieson Avenue would not be altered. On Courthouse Square South, the existing street trees would be removed and replaced with three new street trees. It is intended that the trees have larger canopies than the existing trees, but that they not block views to and from the face of the building. Low plantings would be established within the tree pits at the base of the trees, forming a consistent green edge to frame the building's public entry. The existing beds against the face of the building, and their associated vegetation, would not be altered. On Elizabeth Lane, the small maples would be removed and replaced with a consistent line of street trees.

Overall, impacts to vegetation under the Action Alternative would be beneficial, due to the establishment of new planting beds on Jamieson Avenue and the expansion of the tree boxes on Courthouse Square South, thereby increasing the vegetative area on the site. Although street trees would be removed along Courthouse Square South and Elizabeth Lane, the existing specimens are small and the trees would be replaced, establishing consistent green edges along the two rights-of-way.

No Action Alternative

Under the No Action Alternative, there would be no changes to vegetation at the site and thus impacts would be negligible.

3.6 STORMWATER MANAGEMENT

3.6.1 How is Stormwater Managed in the Vicinity of the Site?

The existing site, exclusive of the courthouse building, is approximately 1.4 acres, roughly 82 percent of which is covered with impervious surfaces, including sidewalks, driveways, and guard shack. Stormwater drains away from the building to the south and is collected by storm drain inlets at the periphery of the site. In this portion of the City, the stormwater system is separate from the sanitary sewer system. The stormwater flows from the inlets through pipes that outfall at Old Cameron Run Channel which drains into Hooff's Run, which then flows to Cameron Run and eventually reaches the Potomac River approximately 1.7 miles downstream from the site.

3.6.2 How Would Stormwater Management be Affected by the Proposed Project?

Action Alternative

As a federal agency, it is GSA's policy to comply with the intent of the Chesapeake Bay Preservation Act to the greatest extent practicable, as well as Executive Order 13508. This order calls upon federal agencies to join the Chesapeake Bay watershed jurisdictions in establishing two-year milestones for water quality, ultimately leading to the 2025 implementation goal.

According to Virginia DEQ, all areas of the City of Alexandria not classified as Resource Protection Areas (RPAs) are designated

Resource Management Areas (RMAs). As such, they are subject to general performance criteria found in the Chesapeake Bay Preservation Area Designation and Management Regulations. GSA would comply with these regulations, including requirements to minimize land disturbance, retain indigenous vegetation, and minimize impervious surfaces.

Demolition and construction activities associated with implementation of the perimeter security improvements would disturb approximately 0.6 acre of the existing 1.4-acre site. There could be minor short-term construction-related impacts to stormwater quality due to increased sediment flow; however, this would be minimized by implementing BMPs.

Construction of the perimeter security elements would disturb the existing storm drain inlets on Jamieson Avenue and Elizabeth Lane. The inlets along Elizabeth Avenue would be rebuilt and the inlets along Jamieson Avenue would be moved and rebuilt. Construction of the perimeter security improvements would also include expansion of some existing planting areas and installation of new planting areas, which would result in a decrease in impervious surface on the site of about 0.13 acre (9.4%), depending on the final layout of sidewalks, driveways, and planting areas. This decrease in impervious surfaces has the potential to increase groundwater recharge and reduce stormwater flow from the site, resulting in beneficial impacts. GSA would further evaluate the use of Low Impact Development (LID) measures in its detailed design for the improvements in order to further reduce stormwater quantity and improve stormwater quality on the site.

No Action Alternative

Under the No Action Alternative, there would be no changes to the stormwater system or the amount of impervious surface area at the site. Thus, impacts would be negligible.

3.6.3 What Measures Should be Undertaken to Reduce Impacts to Stormwater?

GSA would coordinate with the City of Alexandria to move and replace the storm drain inlets. GSA would also seek to comply with the City of Alexandria and the State of Virginia's regulations pertaining to the control of stormwater from construction sites. The City requires any construction project that disturbs at least 2,500 square feet to have an Erosion and Sediment Control Plan. Additionally, the Virginia Department of Conservation and Recreation (DCR) Stormwater Management Program (VSMP) requires the project to have a Stormwater Pollution Prevention Plan (SWPPP) related to the General Permit for Discharges from Construction Activities. These plans would reduce the potential for short-term adverse impacts to stormwater. In addition, GSA would employ BMPs during the construction of the improvements to reduce sediment/other pollutants in runoff.

3.7 VEHICULAR AND NON-VEHICULAR TRANSPORTATION AND PARKING

Symmetra Design, in coordination with the City of Alexandria, completed a *Transportation Impact Study* in January 2012 to document existing conditions and to assess projected impacts associated with the

proposed perimeter security upgrades at the A.V. Bryan Courthouse. The following analysis is based on that study.

3.7.1 What are the Current Vehicular Traffic Conditions at the A.V. Bryan Courthouse?

Road Accessibility

Regional access to the A.V. Bryan Courthouse is provided from the Capital Beltway (Interstate 95/495), Route 1 (Henry and Patrick Streets), Washington Street, and Duke Street. Local access is provided by Eisenhower Avenue, Mill Road, and Dulany Street. Jamieson Avenue and Elizabeth Lane provide direct access to employee garage parking. The following is a description of area roadways.

Jamieson Avenue is a two-lane local roadway and provides mid-block access to the courthouse's underground parking facility. There are two additional lanes on the southeast side of the roadway, but they are not open to vehicular traffic. Instead, one is enclosed within Jersey barriers and a second is dedicated to government and law enforcement parking between 6 a.m. and 7 p.m. Monday through Friday. The speed limit is 25 miles per hour.

Courthouse Square is a two segment roadway which is separated by the park area fronting the main A.V. Bryan Courthouse entrance. Vehicle access is closed to the public along the westernmost segment of the road, directly in front of the A.V. Bryan Courthouse (Courthouse Square South). The easternmost segment (Courthouse Square North) is open to two-way through traffic and extends north to the intersection with Jamieson Avenue and south to the intersection with Ballenger Avenue.

- **Elizabeth Lane** is a two-lane local roadway that connects Ballenger and Eisenhower Avenues and provides mid-block garage access. The West public parking garage, opposite the courthouse on the east side of the street, is also accessed from Elizabeth Lane.
- **Eisenhower Avenue** is a two-way urban minor arterial roadway that varies from five to six lanes in width in the vicinity of A.V. Bryan Courthouse. The corridor handles approximately 14,000 vehicles per day. The speed limit is 25 miles per hour.
- **Mill Road** is an urban collector varying in width from four to five lanes. Approximately one-quarter mile south of the Courthouse, Mill Road provides access to and from the I-495 Capital Beltway via a pair of connector ramps. The speed limit is 25 miles per hour.
- **Ballenger Avenue** is a local east-west street that runs from the intersection with Holland Avenue to the east to the Elizabeth Lane/Courthouse Square Intersection in the west. Curb parking is permitted along most of the roadway.
- **Mandeville Lane** provides access to the Hoffman Town Center Garage and an adjacent surface parking lot. The parking lot services the Hoffman movie theater and surrounding office buildings.
- **Dulany Street** is a north-south four to five lane roadway. The roadway extends from Duke Street to the north and terminates

at the U.S. Patent and Trademark Office. The northbound and southbound sections of the roadway are divided by a median.

- **Mill Race Lane** is a two-lane local street. The southern approach of the intersection will provide access to several developments in the future.

Turning movement counts were conducted during the city's peak travel periods, from 7:00 AM to 9:00 AM and from 4:00 PM to 7:00 PM on five days between May and October 2011. This data indicated that the system's peak traffic hours were between 7:45 and 8:45 AM and 5:00 and 6:00 PM.

Level of Service

As part of the study, Level of Service (LOS) capacity analyses were conducted for the study area intersections. The majority of the intersections in the vicinity of the A.V. Bryan Courthouse operate at an LOS C or better during both AM and PM peak hours. The exceptions are at Jamieson Avenue and Dulany Street more than three blocks to the east, which operates at LOS E during the AM peak hour, and at Courthouse Square & Jamieson Avenue, which operates at LOS E in the PM peak hour. LOS D is considered acceptable within the City of Alexandria. The City has indicated that a signal warrant study was conducted for the Courthouse Square and Jamieson Avenue intersection and that a signal is not justified at this time. However, with the addition of traffic through this intersection due to one percent annual growth, a signal may be warranted by 2013. The implementation of this signal would allow the intersection LOS to improve from LOS E to LOS B.

3.7.2 What are the Current Parking Conditions at the A.V. Bryan Courthouse?

The garage entrances on Jamieson Avenue and Elizabeth Lane provide access to the A.V. Bryan Courthouse parking garage. No visitor parking is provided on site. Curbside parking around the A.V. Bryan Courthouse is very limited and visitors are strongly encouraged to use public transportation.

There are several public parking garages in the area where visitors may also park. The West public parking garage located at 550 Elizabeth Lane provides a total capacity of 1,805 self-park spaces. The Hoffman Town Center garage is west of the A.V. Bryan Courthouse and accessible via Mandeville Lane. The garage provides 2,883 spaces.

3.7.3 How Do Pedestrians and Bicyclists Access the Site?

Sidewalks adjacent to Elizabeth Lane, Jamieson Avenue, and Courthouse Square provide pedestrian access to the A.V. Bryan Courthouse. Field survey indicated that sidewalk widths are adequate to handle existing pedestrian flows. At the garage entry on Jamieson Avenue, the location of the security booth and the grade of the garage ramp make it difficult for motorists exiting the garage to see pedestrians walking along the sidewalk, creating a slight safety hazard.

Crosswalks, pedestrian signals, and landings are provided on all sides of approach at Mill Road's intersections with Jamieson and Eisenhower Avenues. Landings and crosswalks are also available at the intersection of Elizabeth Lane and Courthouse Square South, and a mid-block crosswalk with landings is present across Elizabeth Lane between Courthouse Square and Eisenhower Avenue. Crosswalks, pedestrian signals, and landings are provided on the northern and eastern sides of

the Elizabeth Lane/Eisenhower Avenue intersection, but signals and crosswalks are not present on the western and southern sides.

On-street bikeways are designated on Jamieson Avenue from Mill Road to Holland Lane; on Eisenhower Avenue from Mill Road to Holland Lane; and on Mill Road from Jamieson Avenue to Eisenhower Avenue.

3.7.4 What Public Transit Systems Currently Service the A.V. Bryan Courthouse?

Two Washington Metropolitan Area Transit Authority (WMATA) Metrorail stations are located within 0.5 miles of the A.V. Bryan Courthouse. The Eisenhower Avenue Station is to the southwest of the courthouse and is served by Metrorail's Yellow Line. The King Street Station is located northwest of the courthouse and is served by the Yellow and Blue Metrorail lines. Virginia Railway Express (VRE) and Amtrak stop at the King Street train station, which is located adjacent to the King Street Metrorail Station.

Bus systems servicing the study area include the Alexandria DASH (AT7 and AT1) and the Richmond Highway Express. Bus stops near the A.V. Bryan Courthouse include Jamieson Avenue south-side approaching Courthouse Square; Jamieson Avenue north-side (across from Courthouse Square South); Mill Road west-side (just south of the intersection with Jamieson Avenue); and Mill Road east-side (bordering A.V. Bryan Courthouse to the west).

3.7.5 How Would Vehicular Traffic be Affected by the Perimeter Security Improvements?

No Action Alternative (Future 2013 No Build Conditions)

For the purposes of this analysis, the year 2013 was selected for the analysis of the No Action Alternative (Future No Build Conditions). This scenario is used as a baseline comparison for understanding impacts of no build versus build conditions in the future. This analysis assumes the following:

- The City of Alexandria is planning to modify the Eisenhower Avenue and Mill Road intersection by year 2013.
- Trip generation is not anticipated to change from existing 2011 patterns.
- Roadway traffic will increase by 1% per year from the existing traffic in 2011 due to regional growth.
- Vacant buildings at 2025 Ballenger Avenue and 1920 Ballenger Avenue, comprising 98,000 square feet of office space and 30,000 square feet of ground floor retail, will be occupied by 2013.
- Block O, comprising 344 residential units, is planned for a site north of Eisenhower Avenue/Holland Avenue traffic circle.

Key changes from existing conditions to those projected under Future 2013 No Build Conditions include:

- The LOS will decline at Jamieson Avenue/Courthouse Square from a LOS D to a LOS E during the AM peak hour.
- At Ballenger Avenue/Courthouse Square, the intersection operation will decline from an LOS A to an LOS C due to annual

traffic growth and additional traffic from the buildings on Ballenger Avenue.

- The existing operational issues at the Dulany Street/Jamieson Avenue intersection will improve slightly by optimizing the signal timing.
- The existing queuing and congestion observed at the Mill Road/Eisenhower Avenue intersection will be improved by the roadway improvements planned by the City of Alexandria.
- At Mill Road and Mandeville Lane and at Jamieson Avenue and Dulany Street signal optimization and additional vehicles on the mainline will result in slightly improved average vehicle delay.

Overall, the No Action Alternative (Future 2013 No Build Conditions) would result in minor long-term adverse impacts due to the degradation of operational conditions at the Jamieson Avenue/Courthouse Square and Ballenger Avenue/Courthouse Square intersections. In addition, the adverse conditions that currently exist due to the closure of Courthouse Square South would persist. However, there would be long-term beneficial impacts due to improved conditions at the Dulany Street/Jamieson Avenue, Mill Road/Eisenhower Avenue, Mill Road/Mandeville Lane, and Jamieson Avenue/Dulany Street intersections.

Action Alternative (Future 2013 Build Conditions)

Implementation of the perimeter security improvements at the A.V. Bryan Courthouse would not generate additional vehicular trips, because staff levels at the courthouse would remain the same as at present. The perimeter security improvements would reduce the queuing space at the garage entrance on Jamieson Avenue from two

cars to one, and would allow for the reopening of Courthouse Square South to northeast-bound vehicular traffic.

The lane configuration on Jamieson Avenue would be also altered. Proposed plans include modifying the northeast-bound approach to include a shared through-right lane, thereby creating a double right turn from northbound Mill Road onto the eastbound approach of Jamieson Avenue; providing two right turn lanes along the northeast-bound approach of Jamieson Avenue that merge to a single lane northeast of Mill Road; adding a through lane on the southwest-bound approach of Jamieson Avenue, increasing the number of lanes in this direction from two to three; allowing for parking in the southwest-bound travel lanes on Jamieson Avenue after 7:00 PM. Furthermore, it is assumed that area roadway improvements and development discussed under the No Action Alternative would also occur under the Action Alternative.

The majority of study area intersections would continue to operate at acceptable levels of service during both the AM and PM peak periods under Future 2013 Build Conditions. As under the No Action Alternative, the Jamieson Avenue/Dulany Street intersection would operate at LOS E during the AM peak hour, but would be improved slightly through signal timing.

Between the No Action and Action Alternatives:

- There would be slight improvements in intersection operation at the intersection of Mill Road and Jamieson Avenue as a result of the new lane configuration.
- Intersection operations would improve during the PM peak hour at the Jamieson Avenue garage entrance due to the additional travel lane along Jamieson Avenue.

- Intersection operations would be slightly improved at the intersection of Jamieson Avenue and Courthouse Square due to the opening of Courthouse Square South.
- The reduction in queue space at the garage entry on Jamieson Avenue could require that additional cars entering the garage wait briefly while the first is being processed.

Construction of some components of the perimeter security improvements could require the temporary rerouting of vehicular traffic and/or the temporary narrowing or closure of vehicle travel lanes. This would likely result in additional traffic congestion and delays. It is unlikely, however, that traffic in any direction on nearby roadways would be completely halted for an extended period of time.

Overall, short-term impacts would be minor. There would be minor long-term adverse impacts due to the reduction in queue space on Jamieson Avenue, and long-term beneficial impacts due to improvement in operations at the intersections of Jamieson Avenue and Courthouse Square, Jamieson Avenue and Mill Road, and Jamieson Avenue and Dulany Street. In addition, there would be beneficial impacts from operational improvements at the Jamieson Avenue garage entry.

3.7.6 How Would Parking be Affected by the Perimeter Security Improvements?

Action Alternative

There would be no loss to public on-street parking as a result of the proposed perimeter security improvements. Existing parking spaces that support law enforcement personnel between 6 AM and 7 PM would be relocated to Elizabeth Lane where parking is currently prohibited. The proposed security improvements would accommodate

the City of Alexandria's plan to increase the number of southwest-bound lanes on Jamieson Avenue to allow for three travel lanes during peak periods and two travel lanes with parking after the PM peak period. Thus, there would be an increase in off-peak parking supply for the local community by providing curb parking between Courthouse Square and Mill Road. The project would not impact the existing parking supply within the A.V. Bryan Courthouse garage. Overall, there would be long-term beneficial impacts to parking due to the increase in curb parking between Courthouse Square and Mill Road.

No Action Alternative

The No Action Alternative would have negligible impacts on parking in the vicinity of the A.V. Bryan Courthouse, because conditions would continue as at present.

3.7.7 How Would Pedestrian and Bicycle Circulation be Impacted by the Perimeter Security Improvements?

Action Alternative

As part of the perimeter security improvements, the sidewalk along Jamieson Avenue would be widened from 8'-9" to 10'. On Courthouse Square South the sidewalk width would be narrowed from 17' to 11'-9", however the public space on this face of the building would be expanded. On Elizabeth Lane, the sidewalk would be narrowed slightly from 10'-7" to 8'-8" in order to accommodate the new tree boxes. All of the Jersey barriers would be removed, allowing for more open and safer pedestrian movement. A raised crosswalk would be installed mid-block on Courthouse Square South between the A.V. Bryan Courthouse and Courthouse Square, and crosswalks at either end of Courthouse Square South would be repainted. Sidewalks on the south side of

Courthouse Square damaged by the placement of Jersey barriers would be repaired as necessary. These improvements would increase the visibility and safety of pedestrians and would heighten motorist awareness in the vicinity of the courthouse, which would result in beneficial impacts.

Widening of the sidewalk along the southeast side of Jamieson Avenue would result in a misalignment between the new curb line and the existing one adjacent to Courthouse Square. This would require the path of pedestrian traffic to divert slightly when traveling along the southeast side of Jamieson Avenue. However, crosswalks would be in place to guide crossing at this intersection and the installation of ADA compliant curb ramps with detectable warning systems would help to guide individuals with visual disabilities. Thus, long-term impacts are anticipated to be negligible.

In the short term, pedestrian circulation on the sidewalks adjacent to the courthouse would be disrupted during construction; however the level of disruption would vary throughout the duration of the project. It is anticipated that construction would be completed within less than a year. Overall, the perimeter security improvements would result in minor short-term adverse impacts, and long-term beneficial impacts, to pedestrian circulation in the vicinity of the A.V. Bryan Courthouse.

The perimeter security improvements would have negligible impacts on bicycle circulation in the vicinity of the courthouse.

No Action Alternative

Under the No Action alternative, sidewalks in the vicinity of the courthouse would remain adequate to carry pedestrian traffic. However, pedestrian circulation patterns would continue to be disrupted by the temporary security measures. The No Action

alternative would have negligible impacts on bicycle circulation around the A.V. Bryan Courthouse.

3.7.8 How Would Public Transportation Systems be Affected by the Perimeter Security Improvements?

Action Alternative

Once implemented, the perimeter security improvements would have negligible impacts on bus stops or routes in the vicinity of the A.V. Bryan Courthouse. No bus stops would be permanently removed as part of the security improvements, nor would any bus routes be permanently rerouted.

Depending on the extent of road construction required on Jamieson Avenue, it could be necessary to temporarily reroute buses currently serving the area, particularly those that run northeast-bound on Jamieson Avenue. Additionally, some delays to the timing of bus routes could occur due to general traffic delays resulting from construction activities. However, such reroutings and/or delays would only last for the duration of construction in that area, and buses would return to their normal routes and timing upon completion of construction activities.

Construction and implementation of the security improvements have no potential to affect rail-based transportation resources, due to the distance between the A.V. Bryan Courthouse and those resources.

Overall, there could be short-term minor adverse impacts on public transportation systems and negligible long-term impacts.

No Action Alternative

The No Action alternative would have negligible impacts on public transportation in the vicinity of the A.V. Bryan Courthouse, because conditions would remain as at present.

3.7.9 What Measures Should be Undertaken to Reduce Impacts to Traffic and Transportation?

Prior to construction of the perimeter security improvements, GSA would require the construction contractor to develop a construction management plan that would identify methods of routing vehicular, bicycle, and pedestrian traffic away from construction zones and work areas. New, temporary routes for the various forms of traffic would be identified using appropriate signage. Implementation of such a plan would improve safety for all forms of traffic and minimize the potential for accidents.

In the long term, GSA would explore ways to improve security processing rates without compromising security. GSA would seek to limit the height of the security fence near the garage exit so as not to impede sight distance. GSA and the City of Alexandria would phase the Jamieson Avenue/Mill Road intersection improvements with the perimeter security in order to maintain satisfactory ingress and egress at the garage entry and traffic flows along Jamieson Avenue.

3.8 NOISE

3.8.1 What are the Primary Sources of Noise Surrounding the Courthouse and How is Noise Regulated?

The primary source of ambient noise in the area around the A.V. Bryan Courthouse is vehicular traffic. Privately-owned passenger vehicles comprise the majority of vehicular traffic in the area. Government-

owned vehicles idling in curbside parking spaces on Jamieson Avenue also contribute to the local ambient noise, as does the operation of the Delta barriers at the entrance to the garages on Jamieson Avenue and Elizabeth Lane. The other Delta barrier on the southwest end of Jamieson Avenue is not currently in use and thus does not generate noise. Other nearby sources of ambient noise may include Metrorail trains and freight trains passing on tracks to the west of the courthouse, building construction, street repair, and aircraft. Overall, ambient noise in the area around the A.V. Bryan Courthouse is typical of such noise in a moderately-dense urban environment.

Noise-sensitive receptors are land uses that are considered particularly susceptible to negative effects resulting from prolonged or excessive exposure to unwanted or undesirable sound. Such uses include residential dwellings, hotels, hospitals, nursing homes, educational facilities, and libraries. In the vicinity of A.V. Bryan Courthouse, noise-sensitive receptors would include Carlyle Towers located northwest of the courthouse directly across Jamieson Avenue, the Westin Hotel located northeast of the courthouse across Courthouse Square, and the Residence Inn located west on Mill Road.

The City of Alexandria's noise control code (Title 11, Chapter 5 of the City Code of Ordinances) generally prohibits most sources or activities producing noise levels that "unreasonably annoys, disturbs, injures or endangers the comfort, health, safety, welfare, or environment of others" (Municode, Sec.11-5-4(a)). The code regulates specific types of noise by time of day, decibel (dBA) level, and district or neighborhood within the city. The code specifies that construction noise be limited to the hours of 7:00 a.m. to 6 p.m. Monday through Friday, and 9:00 a.m. to 6:00 p.m. on Saturday.

3.8.2 Would the Project Increase Noise Levels?

Action Alternative

Construction of the perimeter security improvements would temporarily increase ambient noise levels in the area around the courthouse. Ambient noise levels would subside to pre-construction levels upon the conclusion of the project.

The operation of the proposed security improvements does not have the potential to generate long-term increases in ambient noise levels in the vicinity of A.V. Bryan Courthouse. Traffic volumes are not anticipated to increase, nor is the use of the Delta barriers on Jamieson Avenue and Elizabeth Lane. Overall, impacts are anticipated to be short-term and minor. Long-term impacts to noise would be negligible.

No Action Alternative

Ambient noise levels in the area around the A.V. Bryan Courthouse would remain as at present under the No Action Alternative. Therefore, impacts to noise would be negligible.

3.8.3 What Mitigation Measures Should Be Undertaken to Reduce Noise Impacts?

Construction activities would be restricted to the hours specified by the City of Alexandria's noise control code and the construction contractor would employ appropriate BMPs during construction.

3.9 SUSTAINABILITY

3.9.1 What Policies Guide Sustainability and What Measures are Currently in Place at the Site?

In October 2009, Executive Order 13514, *Federal Leadership in Environmental, Energy, and Economic Performance*, was issued, directing all federal agencies to strengthen their sustainable practices. The order expands upon the Energy Independence and Security Act, the Energy Policy Act of 2005, and Executive Order 13423 by requiring federal agencies to implement strategies that measure, manage, and reduce greenhouse gas emissions, water consumption, and diversion of materials. The order mandates federal agencies to meet various energy and environmental targets and defines requirements for sustainability in buildings and leases, sustainable acquisition, and electronic stewardship. The improvements at the A.V. Bryan Courthouse would not include elements that require energy. Goals that are particularly relevant to sustainability, and thus to the site improvements, include:

- Ensure 95% of all new contracts, including non-exempt contract modifications, require products and services that are energy-efficient, water-efficient, biobased, environmentally preferable, non-ozone depleting, contain recycled-content, non-toxic or less-toxic alternatives.
- Participate in regional transportation planning and recognize existing community transportation infrastructure.

Approximately 82 percent of the site is covered by impervious surfaces. Vegetation on the site is limited to street trees and two small planting beds by the main entrance to the courthouse. Stormwater drains from the site and is collected at stormdrains along Jamieson Avenue and Elizabeth Lane.

3.9.2 How Would the Perimeter Security Improvements Affect Sustainability at the Site?

Action Alternative

The perimeter security improvements would expand the vegetation on the site and reduce impervious surfaces by approximately 0.13 acre, or 9.4 percent, depending on the final layout of sidewalks, driveways, and planting areas. This decrease in impervious surfaces has the potential to increase groundwater recharge and reduce stormwater flow from the site, resulting in beneficial impacts. In addition, the removal of the temporary perimeter security measures and their replacement with permanent measures would ensure safe and convenient pedestrian access, in accordance with Executive Order 13514. Finally, the increased vegetation could also contribute to the energy efficiency of the site by potentially moderating temperatures around the building. Overall, long-term impacts would be beneficial.

No Action Alternative

Under the No Action Alternative, there would be no changes at the site and thus impacts to sustainability would be negligible.

3.9.3 What Mitigation Measures Should be Undertaken to Improve Sustainability at the Site?

GSA would evaluate the use of Low Impact Development (LID) measures in its detailed design for the site improvements in order to further reduce stormwater quantity and improve stormwater quality on the site.

3.10 CUMULATIVE IMPACTS

3.10.1 What are Cumulative Impacts and Why are They Considered?

Cumulative impacts result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions. They are considered within this analysis so that the environmental impacts of the proposed action are not viewed in isolation, but are understood within the context of other ongoing or planned changes.

3.10.2 What Past, Present or Future Projects Could Contribute to Cumulative Impacts?

Eisenhower Avenue Metrorail Station Improvements: The City of Alexandria, in cooperation with WMATA, is proposing to build a new entrance to the Eisenhower Avenue Metrorail Station, approximately 0.25 mile southwest of the A.V. Bryan Courthouse. The new entrance would be located on the north side of Eisenhower Avenue, and would facilitate pedestrian access to the station by eliminating street-level crossings of Eisenhower Avenue. Construction of the new entrance would include extending the station platform over Eisenhower Avenue, as well as other necessary infrastructure such as escalators, stairs, an elevator, and fare collection systems. The project was included in the Metropolitan Washington Council of Government's FY2011 Financially Constrained Long Range Transportation Plan, and a Documented Categorical Exclusion was prepared for the project in April 2011 (WMATA, 2011). As of November 2011, funding has not been allocated to the project, and the start date for construction is unknown.

2050 Ballenger Avenue: This four-story commercial building is located on the northwest corner of Ballenger Avenue and Elizabeth Lane,

immediately east of the A.V. Bryan Courthouse. The building has 52,000 square feet of office space and 16,000 square feet of ground-floor retail, and is expected to be occupied by 2013 (Symmetra Design, 2012).

1920 Ballenger Avenue: This building is also four stories and has 46,000 square feet of office space and 14,000 square feet of retail. The building is located less than 0.25 mile east of the A.V. Bryan Courthouse, and is expected to be occupied sometime in 2013 (Symmetra Design, 2012).

Hoffman Blocks 11 and 12: These sites are on the south side of Eisenhower Avenue, immediately east of the Eisenhower Avenue Metrorail Station and approximately 0.2 miles south of the A.V. Bryan Courthouse. They have been approved for two buildings totaling 1.3 million square feet to include 1,200 residential units and 67,000 square feet of retail, of which 50,000 will be a grocery store (Parker, 2011).

Lane Property Blocks 19 and 20: This site is also located on the south side of Eisenhower Avenue, immediately east of the Hoffman sites described above. In June 2009, the site was approved for two buildings totaling 474,000 square feet of residential and 585,000 square feet of office space (Parker, 2011).

Block O: This property is located north of the Eisenhower Avenue/Holland Lane traffic circle, approximately 0.2 mile southeast of the A.V. Bryan Courthouse. It is currently under construction, and will have 344 residential units when complete (Parker, 2011).

Block P: This site lies south of the Eisenhower Avenue/Holland Lane traffic circle and has approved site plans and building permits for a 342,162 square foot office building with ground floor retail (Parker, 2011).

3.10.3 What Cumulative Impacts Would Occur from the Proposed Action?

Land Use and Planning Policies

The proposed improvements would not impact land use and thus cumulative impacts would be negligible. Cumulative impacts to planning policies as a result of the proposed perimeter security improvements would also be negligible.

Public Space

The proposed improvements would result in minor adverse impacts due to the restriction of pedestrian flow along the sidewalks adjacent to the building, and beneficial impacts from the removal of temporary security measures. It is not anticipated that past, present, or foreseeable projects in the immediate area would substantively impact public space. Thus, cumulative impacts would be negligible.

Visual Resources

Projects in the immediate vicinity of the site would not substantively impact key viewsheds or the visual quality of the site. Thus, cumulative impacts to visual resources would be negligible.

Vegetation

The proposed security improvements would result in beneficial impacts to vegetation due to the increase in vegetated area on the site. Projects within the surrounding area may also include new landscaping. Thus, there could be beneficial cumulative impacts to vegetation when the security improvements at the A.V. Bryan Courthouse are considered together with past, present and reasonably foreseeable future projects.

Stormwater

The proposed security improvements would result in minor short-term adverse impacts to stormwater due to increased sediment flows. If the construction of the perimeter security improvements occur concurrently with other projects in the area, this could result in a minor adverse cumulative impact to stormwater quality during construction.

Vehicular and Non-Vehicular Transportation and Parking

Vehicular traffic in the vicinity of the A.V. Bryan Courthouse is projected to increase by one percent annually through 2013 as a result of future development (Symmetra Design, 2012). However, vehicle trips to and from the courthouse would not increase because there would be no increase in employment as part of the proposed action. Similarly, the perimeter security improvements would not result in an increase in visitors to the courthouse, because uses and activities conducted there would not change. Thus, long-term cumulative impacts to vehicular circulation would be negligible. There could be the potential for minor short-term cumulative impacts to vehicular and pedestrian circulation, as well as public transportation, if other projects occur concurrently with the A.V. Bryan Courthouse perimeter security improvements.

Noise

The perimeter security improvements would have short-term minor adverse impacts during construction. If the improvements occurred at the same time as other construction projects within the surrounding area, it could result in minor cumulative impacts to noise over the short-term.

Sustainability

The perimeter security improvements would result in long-term beneficial impacts to sustainability due to the reduction in impervious surfaces on the site and the increase in vegetation. Depending on the detailed design of the new buildings planned within the surrounding area, the perimeter security improvements could contribute to a beneficial cumulative impact to sustainability.

4.0 APPENDICES

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APPENDIX A: SCOPING LETTERS

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October 31, 2011

U.S. General Services Administration
Public Buildings Service
Attn: Ms. Angela Mar, NEPA Program Specialist
301 7th Street, S.W.
Room 2002
Washington, D.C. 20407

Dear Ms. Mar:

This letter responds to a recent letter from Cathleen Kronopolus (date-stamped October 21, 2011; received October 20) regarding the intent of the General Services Administration (GSA) to prepare an environmental assessment (EA) for proposed perimeter security improvements at the Albert V. Bryan U.S. Courthouse, located at 2100 Jamieson Avenue, Alexandria, Virginia.

PROJECT DESCRIPTION

According to the letter, the proposed security improvements are for the benefit of the U.S. Marshals Service, which is a tenant of the building and a cooperating agency in the EA process.

ENVIRONMENTAL REVIEW UNDER THE NATIONAL ENVIRONMENTAL POLICY ACT

According to your letter, the environmental document will be prepared in accordance with the National Environmental Policy Act of 1969 (NEPA). The letter indicates that GSA will accept scoping comments for 15 calendar days, and that the resulting EA will be open for public comment for another 15 calendar days.

The roles of the Virginia Department of Environmental Quality (DEQ) in relation to the project are as follows. First, DEQ's Office of Environmental Impact Review (OEIR) will coordinate Virginia's review of the environmental document prepared pursuant to the National Environmental Policy Act and comment to GSA on behalf of the

Commonwealth. A similar review process will pertain to the Federal Consistency determination (FCD) (next paragraph). If the FCD is provided as part of the environmental document, there can be a single review.

FEDERAL CONSISTENCY UNDER THE COASTAL ZONE MANAGEMENT ACT

Pursuant to the Coastal Zone Management Act of 1972, as amended, federal activities affecting Virginia's coastal resources or coastal uses must be consistent with the Virginia Coastal Zone Management Program (VCP) (see section 307(c)(1) of the Act and the *Federal Consistency Regulations*, 15 CFR Part 930, subpart C). GSA must provide a consistency determination which includes an analysis of the proposed activities in light of the enforceable policies of the VCP (first enclosure) and a commitment to comply with the enforceable policies. In addition, we invite your attention to the advisory policies of the VCP (second enclosure). The FCD may be provided as part of the environmental document or independently, depending on GSA's preference. We recommend, in the interests of an effective review, that the FCD be provided with the environmental document and that 60 days, not 15, be allowed for review, in keeping with the *Federal Consistency Regulations* (see section 930.41(a)). Section 930.39 of these *Regulations*, and Virginia's *Federal Consistency Information Package* (available at <http://www.deq.virginia.gov/eir/federal.html>) give content requirements for the FCD.

PROJECT SCOPING AND AGENCY INVOLVEMENT

While this Office does not participate in scoping efforts beyond the advice given herein, other agencies are free to provide scoping comments concerning the preparation of the environmental document. Accordingly, we are sharing our response to the letter with selected state and local Virginia agencies which have responsibilities bearing on the subject of the EA. These are likely to include the following (note: starred (*) agencies administer one or more of the enforceable policies of the VCP):

Department of Environmental Quality:

- Office of Environmental Impact Review
- Northern Regional Office*
- Air Division*
- Division of Land Protection and Restoration (formerly Waste Division)

Department of Conservation and Recreation:

- Division of Stormwater Management*
- DSM –Local Implementation*
- Division of Planning and Recreation Resources

Department of Health (Division of Water Programs)

Department of Historic Resources

Northern Virginia Regional Commission

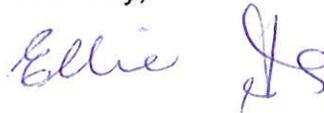
City of Alexandria.

In order to ensure an effective coordinated review of the environmental document and FCD, we will require 16 copies of the EA and FCD when it is published. This submission may include 4 printed copies and 12 CDs, or 4 printed copies and an electronic copy available for download at a GSA web site or ftp site. The document should include a U.S. Geological Survey topographic map as part of its information. We recommend, as well, that project details unfamiliar to people outside GSA be adequately described.

If you have questions about the environmental review process or the federal consistency review process, please feel free to call me at (804) 698-4325 or John Fisher at (804) 698-4339.

I hope this information is helpful to you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ellie L. Irons".

Ellie L. Irons, Program Manager
Environmental Impact Review

Attachments

cc: David Hartshorn, DEQ-NRO
Kotur S. Narasimhan, DEQ-Air
Richard J. Criqui, Jr., DEQ-DLPR
Roberta Rhur, DCR
Barry Mathews, VDH
Roger W. Kirchen, DHR
Keith R. Tignor, VDACS
G. Mark Gibb, NVRC
Bruce Johnson, City of Alexandria



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Attachment 1

Enforceable Regulatory Programs comprising Virginia's Coastal Zone Management Program (VCP)

- a. **Fisheries Management** - The program stresses the conservation and enhancement of finfish and shellfish resources and the promotion of commercial and recreational fisheries to maximize food production and recreational opportunities. This program is administered by the Marine Resources Commission (VMRC); Virginia Code 28.2-200 to 28.2-713 and the Department of Game and Inland Fisheries (DGIF); Virginia Code 29.1-100 to 29.1-570.

The State Tributyltin (TBT) Regulatory Program has been added to the Fisheries Management program. The General Assembly amended the Virginia Pesticide Use and Application Act as it related to the possession, sale, or use of marine antifoulant paints containing TBT. The use of TBT in boat paint constitutes a serious threat to important marine animal species. The TBT program monitors boating activities and boat painting activities to ensure compliance with TBT regulations promulgated pursuant to the amendment. The VMRC, DGIF, and Virginia Department of Agriculture Consumer Services (VDACS) share enforcement responsibilities; Virginia Code 3.1-249.59 to 3.1-249.62.

- b. **Subaqueous Lands Management** - The management program for subaqueous lands establishes conditions for granting or denying permits to use state-owned bottomlands based on considerations of potential effects on marine and fisheries resources, tidal wetlands, adjacent or nearby properties, anticipated public and private benefits, and water quality standards established by the Department of Environmental Quality (DEQ). The program is administered by the Marine Resources Commission; Virginia Code 28.2-1200 to 28.2-1213.
- c. **Wetlands Management** - The purpose of the wetlands management program is to preserve wetlands, prevent their despoliation, and accommodate economic development in a manner consistent with wetlands preservation.
- (1) The tidal wetlands program is administered by the Marine Resources Commission; Virginia Code 28.2-1301 through 28.2-1320.
 - (2) The Virginia Water Protection Permit program administered by DEQ includes protection of wetlands --both tidal and non-tidal; Virginia Code §62.1-44.15:5 and Water Quality Certification pursuant to Section 401 of the Clean Water Act.

Attachment 1 continued

Page 2

- d. Dunes Management - Dune protection is carried out pursuant to The Coastal Primary Sand Dune Protection Act and is intended to prevent destruction or alteration of primary dunes. This program is administered by the Marine Resources Commission; Virginia Code 28.2-1400 through 28.2-1420.

- e. Non-point Source Pollution Control - (1) Virginia's Erosion and Sediment Control Law requires soil-disturbing projects to be designed to reduce soil erosion and to decrease inputs of chemical nutrients and sediments to the Chesapeake Bay, its tributaries, and other rivers and waters of the Commonwealth. This program is administered by the Department of Conservation and Recreation; Virginia Code 10.1-560 et seq.)

(2) Coastal Lands Management is a state-local cooperative program administered by the DCR's Division of Chesapeake Bay Local Assistance and 84 localities in Tidewater (see i) Virginia; Virginia Code §10.1-2100 –10.1-2114 and 9 VAC10-20 et seq.

- f. Point Source Pollution Control - The point source program is administered by the State Water Control Board (DEQ) pursuant to Virginia Code 62.1-44.15. Point source pollution control is accomplished through the implementation of:
 - (1) the National Pollutant Discharge Elimination System (NPDES) permit program established pursuant to Section 402 of the federal Clean Water Act and administered in Virginia as the Virginia Pollutant Discharge Elimination System (VPDES) permit program.
 - (2) The Virginia Water Protection Permit (VWPP) program administered by DEQ; Virginia Code §62.1-44.15:5 and Water Quality Certification pursuant to Section 401 of the Clean Water Act.

- g. Shoreline Sanitation - The purpose of this program is to regulate the installation of septic tanks, set standards concerning soil types suitable for septic tanks, and specify minimum distances that tanks must be placed away from streams, rivers, and other waters of the Commonwealth. This program is administered by the Department of Health (Virginia Code 32.1-164 through 32.1-165).

- h. Air Pollution Control - The program implements the federal Clean Air Act to provide a legally enforceable State Implementation Plan for the attainment and maintenance of the National Ambient Air Quality Standards. This program is administered by the State Air Pollution Control Board (Virginia Code 10-1.1300 through §10.1-1320).

- (i) Coastal Lands Management is a state-local cooperative program administered by the DCR's Division of Chesapeake Bay Local Assistance and 84 localities in Tidewater, Virginia established pursuant to the Chesapeake Bay Preservation Act; Virginia Code §10.1-2100 –10.1-2114 and Chesapeake Bay Preservation Area Designation and Management Regulations; Virginia Administrative Code 9 VAC10-20 et seq.



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Attachment 2

Advisory Policies for Geographic Areas of Particular Concern

- a. **Coastal Natural Resource Areas** - These areas are vital to estuarine and marine ecosystems and/or are of great importance to areas immediately inland of the shoreline. Such areas receive special attention from the Commonwealth because of their conservation, recreational, ecological, and aesthetic values. These areas are worthy of special consideration in any planning or resources management process and include the following resources:
- a) Wetlands
 - b) Aquatic Spawning, Nursery, and Feeding Grounds
 - c) Coastal Primary Sand Dunes
 - d) Barrier Islands
 - e) Significant Wildlife Habitat Areas
 - f) Public Recreation Areas
 - g) Sand and Gravel Resources
 - h) Underwater Historic Sites.
- b. **Coastal Natural Hazard Areas** - This policy covers areas vulnerable to continuing and severe erosion and areas susceptible to potential damage from wind, tidal, and storm related events including flooding. New buildings and other structures should be designed and sited to minimize the potential for property damage due to storms or shoreline erosion. The areas of concern are as follows:
- i) Highly Erodible Areas
 - ii) Coastal High Hazard Areas, including flood plains.
- c. **Waterfront Development Areas** - These areas are vital to the Commonwealth because of the limited number of areas suitable for waterfront activities. The areas of concern are as follows:
- i) Commercial Ports
 - ii) Commercial Fishing Piers
 - iii) Community Waterfronts

Although the management of such areas is the responsibility of local government and some regional authorities, designation of these areas as Waterfront Development Areas of Particular Concern (APC) under the VCRMP is encouraged.

Designation will allow the use of federal CZMA funds to be used to assist planning for such areas and the implementation of such plans. The VCRMP recognizes two broad classes of priority uses for waterfront development APC:

- i) water access dependent activities;
- ii) activities significantly enhanced by the waterfront location and complementary to other existing and/or planned activities in a given waterfront area.

Advisory Policies for Shorefront Access Planning and Protection

- a. Virginia Public Beaches - Approximately 25 miles of public beaches are located in the cities, counties, and towns of Virginia exclusive of public beaches on state and federal land. These public shoreline areas will be maintained to allow public access to recreational resources.
- b. Virginia Outdoors Plan - Planning for coastal access is provided by the Department of Conservation and Recreation in cooperation with other state and local government agencies. The Virginia Outdoors Plan (VOP), which is published by the Department, identifies recreational facilities in the Commonwealth that provide recreational access. The VOP also serves to identify future needs of the Commonwealth in relation to the provision of recreational opportunities and shoreline access. Prior to initiating any project, consideration should be given to the proximity of the project site to recreational resources identified in the VOP.
- c. Parks, Natural Areas, and Wildlife Management Areas - Parks, Wildlife Management Areas, and Natural Areas are provided for the recreational pleasure of the citizens of the Commonwealth and the nation by local, state, and federal agencies. The recreational values of these areas should be protected and maintained.
- d. Waterfront Recreational Land Acquisition - It is the policy of the Commonwealth to protect areas, properties, lands, or any estate or interest therein, of scenic beauty, recreational utility, historical interest, or unusual features which may be acquired, preserved, and maintained for the citizens of the Commonwealth.
- e. Waterfront Recreational Facilities - This policy applies to the provision of boat ramps, public landings, and bridges which provide water access to the citizens of the Commonwealth. These facilities shall be designed, constructed, and maintained to provide points of water access when and where practicable.
- f. Waterfront Historic Properties - The Commonwealth has a long history of settlement and development, and much of that history has involved both shorelines and near-shore areas. The protection and preservation of historic shorefront properties is primarily the responsibility of the Department of Historic Resources. Buildings, structures, and sites of historical, architectural, and/or archaeological interest are significant resources for the citizens of the Commonwealth. It is the policy of the Commonwealth and the VCRMP to enhance the protection of buildings, structures, and sites of historical, architectural, and archaeological significance from damage or destruction when practicable.



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

November 2, 2011

Ms. Angela Mar
NEPA Program Specialist
U.S. General Services Administration
201 7th Street, SW, Room 2002
Washington, DC 20407

Re: Scoping Comments for the Proposed Perimeter Security Improvements at the Albert V. Bryan U.S. Courthouse, located at 2100 Jamieson Avenue, Alexandria VA for the U.S. Marshals Service

Dear Ms. Mar:

In accordance with the National Environmental Policy Act (NEPA) of 1969 and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed your letter dated October 21, 2011 requesting scoping comments for the proposed Environmental Assessment (EA) which would address perimeter security improvements at the Albert V. Bryan U.S. Courthouse in Alexandria, VA.

EPA has provided information which should be addressed and included in the proposed EA. This information is outlined in the enclosure titled, "General Comments." Since limited information was presented in your letter for the proposed action, EPA recognizes that some of the information requested may not be relevant. If this is the case, it may be helpful to state that the proposed action will have no impacts on specified resources and include a section in the EA titled, "Environmental Issues Considered But Eliminated From Detailed Analysis."

Thank you for the opportunity to review and comment on this project. If you have questions regarding these comments, please feel free to contact Karen DelGrosso, the staff contact for this project, at 215-814-2765.

Sincerely,

A handwritten signature in black ink, appearing to read "Barbara Rudnick".

Barbara Rudnick
NEPA Team Leader
Office of Environmental Programs

Enclosure (1)



Printed on 100% recycled/recyclable paper with 100% post-consumer fiber and process chlorine free.

Customer Service Hotline: 1-800-438-2474

GENERAL COMMENTS

Purpose and Need

Based on the information provided in your letter, "The purpose and need for the proposed action are to provide for the required level of security at the site, while enhancing the quality of the landscaping and allowing for the removal of temporary security measures." Please describe the security level designation and how the building must meet the criteria for the specified security level. Explain the proposed perimeter security measures that would provide the level of protection that is required by the risks identified in the security level determination.

Alternatives

As described in the regulations for the Council on Environmental Quality (CEQ) (40 CFR §1502.14), the examination and comparison of the alternatives under consideration is the heart of the environmental document. It is through this comparison that the lead agency is able to incorporate agency and public input to make informed decisions with regard to the merits of the project and the advantages and disadvantages of each of the alternatives being studied. Consequently, the CEQ regulations require that the details of each alternative, including the "no action" alternative be clearly presented in a comparative form for easy analysis by the reader. The rationale for the selection of the preferred alternative should be clearly stated in the analysis. For those alternatives that are eliminated from consideration, the reasons for their elimination should be given.

ENVIRONMENTAL IMPACTS

GSA is requesting assistance in identifying potential resource issues that may be impacted as a result of the proposed action. "GSA has identified the following as preliminary impact issues in the EA: Land Use and Planning Policies, Public Space, Visual Resources, Archaeological Resources, Vegetation, Stormwater Management, Noise, Vehicular Traffic, Pedestrian/Bicycle Circulation, Public Transportation, and Parking." In addition to these resources, the EA should examine the potential direct and indirect impacts of the project on the environment. Mitigation measures for any adverse environmental impacts should be described. Additional areas that mandate individual attention are described below.

Air Resources

Attainment/Non-attainment

EPA, under the requirements of the 1970 Clean Air Act (CAA) as amended in 1977 and 1990, has established National Ambient Air Quality Standards (NAAQS) for six contaminants, referred to as criteria pollutants (40 CFR 50). The NAAQS include primary and secondary standards. The primary standards were established at levels sufficient to protect public health with an adequate margin of safety. The secondary standards were established to protect the public welfare from the adverse effects associated with pollutants in the ambient air. The Clean Air Act mandates that state agencies adopt State Implementation Plans (SIPs) that target the elimination or reduction of the severity and number of violations of the NAAQS. The EA should



identify areas that meet the NAAQS standard for a criteria pollutant as well as those areas where a criteria pollutant level exceeds the NAAQS.

Conformity Analysis

A general conformity rule analysis should be conducted according to the guidance provided by the EPA in Determining Conformity of General Federal Actions to State or Federal Implementation Plans. Under the general conformity rule, reasonable foreseeable emissions associated with all operational and construction activities, both direct and indirect, must be qualified and compared to the annual de minimis levels for those pollutants in nonattainment for that area.

Construction Permit Requirements/Temporary Impacts

In an effort to eliminate the NAAQS violation, GSA should control or minimize construction emissions through use of the following typical Best Management Practices (BMPs) in association with the proposed project as it may involve on-site construction.

- Utilize appropriate dust suppression methods during on-site construction activities. Available methods include application of water, soil stabilizers, or vegetation; use of enclosures, covers, silt fences, or wheel washers; and suspension of earth-movement activities during high wind conditions;
- Maintain a speed of less than 15 mph with construction equipment on unpaved surfaces as well as utilize fuel with lower sulfur content;
- Employ a construction management plan in order to minimize interference with regular motor vehicle traffic;
- Use electricity from power poles instead of generators whenever possible;
- Repair and service construction equipment according to the regular maintenance schedule recommended for each individual equipment type;
- Use low-VOC architectural materials and supplies equipment; and
- Incorporate energy-efficient supplies whenever feasible.

Low Impact Development

Federal agencies are required to reduce the impacts on watershed hydrology and aquatic resources. This effort commonly referred to as low impact development (LID), implements environmentally and economically beneficial landscape practices into landscape programs, policies and practices by using a natural approach to land development and stormwater management. Federal agencies are required by Executive Order 13148 to incorporate the



principles put forth in a Guidance dated August 10, 1995. This Guidance is intended to promote principles of "sustainable landscape design and management" which recognizes the interconnection of natural resources, human resources, site design, building design, energy management, water supply, waste prevention, and facility maintenance and operation.

It is important to incorporate LID efforts to mitigate the effects of development through traditional stormwater management practices which have proven to not be entirely successful. For more comprehensive LID information, please refer to the following web sites.

LID Manuals:

- http://www.epa.gov/owow/nps/lid_hydr.pdf
- <http://www.epa.gov/owow/nps/lid/lidnatl.pdf>
- <https://www.bmpdatabase.org>
- <http://www.epa.gov/ednrmrl/>
- Combined Sewer Overflows Guidance for Monitoring and Modeling Document Type, Published: 1/1/99 <http://www.epa.gov/npdes/pubs/chap05-sco.pdf>

Historic Resources

The National Historic Preservation Act (NHPA) of 1966, as amended through 2006, directs federal agencies to integrate historic preservation into all activities which either directly or indirectly involve land use decisions. This is to ensure federal leadership in the preservation of prehistoric and historic resources of the United States. Before approving or carrying out a federal, federally assisted, or federally licensed undertaking, Section 106 of the NHPA requires federal agencies to take into consideration the impact that the action may have on historic properties which are included on, or are eligible for inclusion on, the National Register of Historic Places. Consultation with the State Historic Preservation officer throughout the planning process is recommended.

Cumulative Impacts

Cumulative impacts can result from individually minor, but collectively significant, actions taking place over a period of time. The Council on Environmental Quality in 10 CFR 1508.7 defines cumulative impacts as impacts on the environment which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Therefore, a cumulative impacts assessment should be an integral part of the EA for the proposed action.

Socioeconomic Impacts

Discuss the socioeconomic and cultural status of the area, including the number of people, employees and/or jobs impacted as a result of the proposed project. The EA should address the decrease or increase of people/employees/jobs in relation to its effect on tax base local housing, job markets, schools, utilities, businesses, etc.



Energy Efficiency

Executive Order (EO) 13514 *Federal Leadership in Environmental, Energy, and Economic Performance* was signed on October 5, 2009. The purpose of EO 13514 is "to establish an integrated strategy towards sustainability in the Federal Government and to make reduction of greenhouse gas emissions (GHG) a priority for Federal agencies." The EO does not rescind/eliminate the requirements of EO 13423, *Strengthening Federal Environmental, Energy, and Transportation Management*. Instead, it expands on the energy reduction and environmental performance requirements for Federal agencies identified in EO 13423. EO 13514 sets numerous Federal energy requirements in several areas, including:

- Accountability and Transparency
- Strategic Sustainability Performance Planning
- Greenhouse Gas Management
- Sustainable Buildings and Communities
- Water Efficiency
- Electronic Products and Services
- Fleet and Transportation Management
- Pollution Prevention and Waste Reduction

Please refer to the full text of EO 13514 for specific numerical and non-numerical targets for Federal agencies to reach and show how project planning incorporates EO 3514 requirements, when applicable.

Distribution List

An EA should include a Distribution List of agencies, organizations, and persons to whom copies of the document were sent as indicated in 40 CFR §1502.10 under "Recommended format" and §1502.19. A Distribution List identifies those parties who have been given the opportunity to comment and reveals that those not included on the list may need to be given the EA for review. The information is critical to ensuring all necessary parties are given the opportunity to review and provide input to the impacts of the proposed action.





Department of Planning and Zoning

301 King Street
Suite 2100
Alexandria, Virginia 22314

www.alexandriava.gov

Phone: (703) 746-4666

Fax: (703) 838-6393

November 4, 2011

Ms. Angela Mar
NEPA Program Specialist
U.S. General Services Administration
Public Buildings Service
301 7th Street SW, Room 2002
Washington, DC 20407

Re: Environmental Assessment Scope for Albert V. Bryan U.S. Courthouse
2100 Jamieson Avenue, Alexandria, Virginia

Dear Ms. Mar:

Thank you for the opportunity to comment on the scope of the Environmental Assessment (EA) proposed for the Albert V. Bryan Courthouse in Alexandria. City Staff, including Planning and Zoning, Transportation and Environmental Services, and the Fire Department, have been working closely with GSA to develop an appropriate solution for the security enhancements planned for the Courthouse, and we are encouraged by the progress that has been made thus far. Removal of the temporary security measures and creating a more typical street section that accommodates the high amount of pedestrian activity in Carlyle will be a significant improvement for this area. We strongly encourage GSA to move forward with these plans as quickly as possible.

With regard to the scope of the proposed EA, we agree with the preliminary impact issues that you have identified. In particular, we strongly support careful consideration of the impacts to: (1) Public Space (namely, Courthouse Square which is directly adjacent to the proposed improvements), (2) Vehicular Traffic, and (3) Pedestrian/Bicycle Circulation. Since the installation of the temporary security measures, several new buildings have been constructed and occupied around the Courthouse which brings more residents and employees to this neighborhood. It is essential that the proposed improvements be carried out in a manner that enhances the pedestrian activity that occurs in a mixed-use neighborhood such as Carlyle.

Ms. Angela Mar
NEPA Program Specialist
November 4, 2011
Page 2

We look forward to working with your team to complete the planning for these improvements and proceed with the implementation phase.

Sincerely,

Faroll Hamer

Faroll Hamer, Director
Department of Planning and Zoning

cc: The Honorable William D. Euille, Mayor
Bruce Johnson, Acting City Manager
Mark Jinks, Deputy City Manager
Richard Baier, Director, Department of Transportation and Environmental Services



MEMORANDUM

TO: Angela Mar, NEPA Program Specialist
U. S. General Services Administration, Public Buildings Service
301 7th Street, SW, Room 2002
Washington, DC 20407
angela.mar@gsa.gov

FROM: Richard J. Criqui, Jr., C.P.S.S., DLPR Review Coordinator 

DATE: November 18, 2011

COPIES: Leslie A. Romanchik, Hazardous Waste Program Manager
EIR File

SUBJECT: Scoping Request – Perimeter Security Improvements at the Albert V. Bryan U.S.
Courthouse, Alexandria, VA – Review Comments

The staff from the Division of Land Protection and Revitalization (DLPR) (former Waste Division) has completed its review of the Scoping Request Letter regarding the Perimeter Security Improvements at the Albert V. Bryan U. S. Courthouse, Alexandria, Virginia, dated October 21, 2011. The Scoping Request Letter was submitted to the Department of Environmental Quality (DEQ) by the U.S. General Services Administration (GSA). The Courthouse (project site) is located at 2100 Jamieson Avenue, Alexandria, VA, 22314.

The proposed project funding would come from federal funding and; therefore, the project must comply with the National Environmental Policy Act (NEPA) of 1969, as amended. The scoping request is intended to prepare an environmental assessment (EA) for the project in accordance with Section 102 of the NEPA.

The proposed project is to provide for the required level of security at the site, while enhancing the quality of the landscaping and allowing for the removal of temporary security measures.

We have provided the below comments concerning the Scoping Request Letter and information provided and the potential related waste issues which may impact or be impacted by this proposed project.

Solid waste, hazardous materials, and/or hazardous waste issues were not addressed in the Scoping Request Letter. The Letter and enclosed information does not indicate that State and federal databases were searched nor does it indicate that waste related sites information was obtained from the DEQ's DLPR files.

The DLPR staff conducted a cursory review of its database files including a GIS database search of the Virginia Environmental Geographic Information Systems (VEGIS) (within a 0.25 to 0.5 mile radius) of the project site and determined a few facility waste sites were located within the project area and the zip

code 22314; however, their proximity to the subject project site and potential impact by the project is unknown.

The staff's summary comments are as follows:

Hazardous Waste Facilities

Search of the RCRAInfo database under zip code 22314 found the following large quantity generators (LQGs) or permitted treatment, storage, disposal (TSD) facilities:

- Alexandria Rail Yard, Eisenhower Avenue, Alexandria, VA, 22314, EPA ID No. VAD981111784, Facility is a Large Quantity Generator (LQG), Facility contacts are Joan E. Lelacheur, 301-618-7522, and Donald Painter, 202962-5136.
- Carlyle Block, Holland Lane, Alexandria, VA, 22314, EPA ID No. VAR000515460, Facility is a LQG, Facility contact is Steve Slater, 703-299, 1518.
- Genon Potomac River LLC., North Royal Street, Alexandria, VA, 22314, EPA ID No. VAD000731588, Facility is a LQG, Facility contact is David Ciotti, 703-838-3701.

The facility project manager or engineer should contact the DEQ's Northern Regional Office (NRO) to establish the location of the above hazardous waste facilities.

(See: <http://www.deq.virginia.gov/regions/northern.html>; also see: <http://www.epa.gov/enviro/facts/rcrainfo/search.html>.)

Solid Waste Facilities

No solid waste facilities, either closed or permitted, were found in the search of the DEQ's Solid Waste Sites Inventory under zip code 22314, and /or within 0.5 miles of the project site.

CERCLA Sites

The following CERCLA facility site was found on the CERCLIS database under zip code 22314, and/or within 0.5 miles of the project site:

- Alexandria Town Gas & Oronoco Outfall, Oronoco Street, Alexandria, VA, 22314, EPA ID No VAD988201976, Not on the National Priorities List (NPL), Not a Federal Facility, Other Cleanup Activity, State Lead Cleanup. Incident Category Waterways/Creeks/Rivers.

If any of the above identified site(s) are found to be in close proximity to the proposed project, then further information regarding the above identified Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) site(s) may be in order. The facility representative (project manager or engineer) should contact the Environmental Restoration Program Manager for the CERCLA or Federal Facility site for further site information, the administrative records, as needed, to establish the site location, and the nature and extent of the contamination.

For further information concerning CERCLA site obligations with the above identified sites, the DEQ also recommends that the project manager or engineer contact OSWER at the following: <http://www.epa.gov/aboutepa/oswer.html#OSRTI>, or for federal facility sites, contact Karen Sismour, Federal Facilities Program Manager, Office of Remediation Programs (ORP), DEQ (804-698-4421), or for non-federal facility sites, contact Tom Modena, P.E., DEQ, Office of Remediation Programs, 804-698-4183.

FUDs Sites

The following FUDS facility sites were found on DEQ's FUDs Sites Inventory under zip code 22314, and/or within 0.5 miles of the project:

- Jones Point Park Alexandria, VA, 22314, FUDS No. C03VA0023, FFID No. VA9799F1563.
- Ford Plant, Alexandria, VA, 22314, FUDS No. C03VA0040, FFID No. VA9799F8219.
- Q.M. Market Center, Alexandria, VA, 22314, FUDS No. C03VA0174, FFID No. VA9799F1649.
- Naval Torpedo Station, Alexandria, VA, 22314, FUDS No. C03VA1004, FFID No. VA9799F1726.

For the location and further information regarding the above FUDs sites, please contact Karen Sismour, Federal Facilities Program Manager, Office of Remediation Programs (ORP), DEQ (804-698-4421).

VRP Sites

Search of the DEQ's Voluntary Remediation Program (VRP) Sites Inventory under zip code 22314, and/or within 0.5 miles of the project found the following VRP sites:

- VRP No. VRP00292, Rail Yard - Carlyle West Block C., 1940 Duke Street, Alexandria, VA, 22314, Status – VRP Certificate Issued 12/03/2002.
- VRP No. VRP00425, Alexander Carlyle Centre (Formerly Alexandria Mini-Storage), Alexandria, VA, 22314, Status – VRP Certificate Issued.
- VRP No. 00281, Carlyle Block L, Lot 701, Alexandria, VA, 22314, Status – VRP Certificate Issued.
- VRP No. 00215, Carlyle – USPTO, Alexandria, VA, 22314, Status – VRP Certificate Issued.
- VRP00518, Carlyle Place, Alexandria, VA, 22314, Status – VRP Eligibility Established.
- VRP00184, Carlyle – Block B (Formerly Block A, B, and C), Alexandria, VA, 22314, Status – VRP Certificate Issued.
- VRP 00261, Witter Recreational Facility (Formerly CSXT Lot 700), Alexandria, VA, 22314, Status – Enrolled in VRP.
- VRP00270, Carlyle Block P, Alexandria, VA, 22314, Status – Enrolled in VRP.
- VRP00397, Carlyle Block F- West, Alexandria, VA, 22314, Status – VRP Certificate Issued.
- VRP00305, Carlyle Block O, Alexandria, VA, 22314, Status – Enrolled in VRP.

- VRP00461, Virginia Concrete Company, Alexandria, VA, 22314, Status – Enrolled in VRP.
- VRP00451, Carlyle Block L, Lot 700, Alexandria, VA, 22314, Status – VRP Certificated Issued.
- VRP00476, Old Town Gas, Alexandria, VA, 22314, Status – Potential VRP Candidate.

Please note that the DEQ's VRP Nos. and VRP case files within the above zip codes and/or within 0.5 miles of the proposed project are identified above and these VRP cases should be further evaluated by the project engineer or manager to establish the exact location of the facility and the nature and extent of the release and the potential to impact the proposed project. The facility representative should contact the DEQ's VRP Program and/or the DEQ's Northern Regional Office (NRO) for further information and the administrative records of the VRP case and to establish the nature and extent of contamination if in close proximity to the proposed project.

(See: <http://www.deq.virginia.gov/vrp/contactus.html>, www.deq.virginia.gov/regions/northern.html.)

Petroleum Release Sites

The following petroleum release sites were found on the DEQ's Inventory within 0.25 miles of the project site:

- Alexandria Scrap Yard (XREF 90-280 and 91-1290), 2324 Mill Road, Alexandria, VA, 22314, DEQ PC No. 19900763, 3/06/2007, Status – Release Confirmed, Case Closed.
- Alexandria Southern Property, 425 Holland Street, Alexandria, VA, 22314, DEQ PC No. 19920210, 3/08/2007, Status – Release Confirmed, Case Closed.
- Norfolk Southern, 401 Holland Lane, Alexandria, VA, 22314, DEQ PC No. 19920784, 3/12/2007, Status – Release Confirmed, Case Closed.
- Norfolk Southern Railway, 401 Holland Lane, Alexandria, VA, 22314, DEQ PC No. 19911290, 3/07/2007, Status – Release Confirmed, Case Closed.
- Norfolk Southern Shop, 401 Holland Lane, Alexandria, VA, 22314, DEQ PC No. 19931292, 3/09/2007, Status – Release Confirmed, Case Closed.
- Oliver Carr Company, 1930 Diagonal Road, Alexandria, VA, 22314, DEQ PC No. 19890896, 3/02/2007, Status – Release Confirmed, Case Closed.
- Potomac Concrete, 2318 Mill Road, Alexandria, VA, 22314, DEQ PC No. 19900699, 3/05/2007, Status – Release Confirmed, Case Closed.
- U.S. Post Office – Alexandria Vehicle Maintenance, 2300 Duke Street, Alexandria, VA, 22314, DEQ PC No. 19920309, 3/16/2007, Status – Release Confirmed, Case Closed.

(Note: Dates are the latest PC Database edit dates of the specific PC Case Nos.)

Please note that the DEQ's PC case files of the PC Case Nos. within 0.25 miles of the proposed project are identified above and these petroleum releases should be evaluated by the project engineer or manager to establish the exact location of the release and the nature and extent of the petroleum release and the potential to impact the proposed project. The facility representative should contact the DEQ's Northern

Regional Office (NRO), Tank Program, for further information and the administrative records of the PC cases which are in close proximity to the proposed project.

(See: www.deq.virginia.gov/regions/northern.html.)

GENERAL COMMENTS

Soil, Sediment, and Waste Management

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. 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.

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 Richard J. Criqui, Jr., C.P.S.S., Environmental Engineer Senior, at (804) 698-4013.



IN REPLY REFER TO:
NCPC File No. 3048

November 3, 2011

Ms. Angela Mar, NEPA Program Specialist
U.S. General Services Administration
Public Buildings Service
301 7th Street, SW, Room 2002
Washington, DC 20407

Re: Albert V. Bryan U.S. Courthouse Perimeter Security Environmental Assessment

Dear Ms. Mar:

Thank you for the opportunity to provide scoping comments on the preparation of an Environmental Assessment (EA) for the Albert V. Bryan U.S. Courthouse perimeter security project. According to your letter dated October 21, 2011, the General Services Administration is proposing permanent perimeter security measures for the courthouse in order to provide the required level of security at the site.

NCPC staff agrees with the list of environmental topic areas that GSA has already identified for inclusion in the EA. In addition to this list, we request that the EA include an analysis of each alternative's consistency with NCPC's *National Capital Urban Design and Security Plan Objectives and Policies*, adopted by the Commission in May 2005, and specifically with regard to the location and design of physical security elements in public space. For your convenience, a copy of these objectives and policies is attached to this letter.

If you have any questions, please contact Carlton Hart at (202) 482-7252 or carlton.hart@ncpc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Levy", with a long, sweeping horizontal line extending to the right.

David W. Levy, RA, AICP
Director, Urban Design and Plan Review

Enclosures

National Capital Urban Design and Security Plan Objectives and Policies

Adopted by the National Capital Planning Commission on May 5, 2005

Introduction

Intent and Applicability

There are many aspects to security planning and design that must be considered when designing security measures to protect buildings and their occupants. Risk management strategies for chemical, biological radiological or explosive threats, range from infrastructure protection, building construction and perimeter security to surveillance and operations. The criteria are derived from various Presidential directives and other federal security criteria contained in documents such as the Department of Homeland Security's *Interagency Security Committee Manual for New Federal Office Buildings and Major Modernization Projects*, the Department of Defense's *Unified Facilities Code*, and the National Capital Planning Commissions' *National Capital Urban Design and Security Plan*.

Criteria in the *Interagency Security Committee Manual and the Unified Facilities Code* address the architectural design, engineering and construction of buildings and structures, electronic security, parking security, and building perimeter security. The *National Capital Urban Design and Security Plan (Plan)*, including these objectives and policies contained herein, addresses planning and design issues associated with risk management strategies that impact the public realm, primarily physical perimeter security for explosive delivered by bomb-laden vehicles. The Plan and its objectives and policies should be used in conjunction with other federal security criteria.

When choosing security measures to lessen the probability of progressive building collapse, these security design objectives and policies should be used as guidelines to address important city planning and design issues that should be considered when it is necessary to construct physical perimeter security in urban areas. They are intended to balance the need for perimeter security with the need to protect public space by keeping it open, accessible and attractive.

The objectives and policies will be used to review development plans for perimeter security projects within urban settings in the National Capital Region. In accordance with the Commission's existing in-lieu of zoning authority, they will be used to evaluate physical perimeter security proposals on federally owned land within the District of Columbia and other public projects in the central area, and to make recommendations on federal projects in National Capital Region. These policies apply to permanent physical perimeter security projects for existing buildings and new construction. Except for section II.C.2, Urban Landscape Contextual Design, these policies also apply to temporary security projects.

The objectives and polices reinforce the importance of design quality in the nation's capital where it is important to respect community identity and a culture of democracy. The objectives and policies strive to balance building security with the functional and visual quality of public space, paying attention to: (1) the monumental core's historic resources and the democratically-inspired design principles inherent in D.C.'s historic city plan; (2) the District's and surrounding region's need for mobility, mixed use development and activated street level activity to protect and enhance its economic vitality; and (3) the importance of protecting public space from the adverse impacts of perimeter security to ensure that residents, workers and visitors maintain their rights to access, use and enjoy the grace and beauty of public space in the capital and the region.

I. Objectives

1. To protect the design principles inherent in D.C.'s historic plan and its historic resources and minimize the physical and visual intrusion of security barriers into public space (such as the national capital's vistas, rights-of-way, parks, squares, circles and plazas). These spaces, vistas and environs embody the American ideals of a free and open society.
2. To strike a balance between physical perimeter security for federal buildings and the vitality of the public realm.
3. To acknowledge that acceptance of a reasonable level of risk is inherent in striking an appropriate balance between security provisions and other fiscal, planning, design and operational objectives.
4. To encourage a multi-faceted approach to selection of appropriate security measures that considers intelligence information, operational and procedural measures (such as surveillance and screening) and design strategies (such as structural engineering, window glazing, emergency egress and physical perimeter barriers).
5. To limit the vulnerability from explosives entering or being placed adjacent to sensitive federal buildings.

II. Policies

A. Security Measures

These policies promote risk management strategies that are effective for different threat conditions and minimize the placement and impact of security barriers on public space. The selection of appropriate operational, procedural and physical protective measures should differ for various communities based on specific development patterns and personnel resources. Urban conditions may require more operational security measures and sensitive building design to minimize the impact of physical security barriers on public space; whereas, suburban or campus-like conditions may make more use of physical design strategies, such as greater standoff distances.

1. Intelligence information, operational and procedural controls and physical protective measures at building entries and within the building, should be the primary defense against environmental hazards and persons carrying explosive devices.
2. Intelligence information, operational controls and physical design measures should be used to protect against vehicle-borne explosives.

B. Physical Perimeter Security and Mobility

These physical perimeter security polices strive to balance security with the needs of the city's multi-modal transportation system to ensure safety and efficient mobility for residents, workers and visitors throughout the national capital region.

1. Permanent closure of streets or sidewalks within right-of-ways established by the L'Enfant Plan should be prohibited.
2. Temporary closure or access restrictions to streets, parking lanes, or sidewalks should be limited to only the protection of those uses deemed absolutely essential for immediate continuity of critical government operations. These closures or restrictions should only be allowed during times of extraordinary security threats, or brief periods of time when required for extraordinary events or activities, such as large public demonstrations, the State of the Union Address or ceremonial parades.

Temporary closure or access restrictions should be in accordance with previously established plans and procedures. Coordination should occur among governmental entities directly affected by the closure or those that can provide meaningful input on a range of potential impacts caused by the closure, such as: the Department of Homeland Security-National Capital Region Coordination, the local emergency management service, the local law enforcement agency, the US Capitol Police, the US Park Police, the US Secret Service, the Federal Protective Service, local planning and transportation offices and the National Capital Planning Commission, as appropriate.

3. The National Security Threat Level and the determination of which uses are absolutely essential for immediate continuity of critical government operations should be made by the Secretary of Homeland Security.
4. Streets necessary for emergency evacuation should not be closed, blocked or access restricted except for brief periods when required for extraordinary events or activities.

C. Physical Perimeter Security

Intelligence information, operational procedures, building hardening and physical barriers are risk management measures used to secure buildings from the threat of bomb laden vehicles.

Intelligence information, operational procedures and building hardening are risk management measures that have little or no physical impact on public space.

When physical perimeter security is necessary, it should be located within and integrated into the design of the building yard. If there is no building yard, as typically found in urban areas, it may be necessary to place physical perimeter security measures in public space. This should be done in an unobtrusive manner that appropriately integrates the security barriers into an attractive urban landscape.

C.1. Barrier Placement and Design

1. New buildings in urban settings should be constructed at established urban building lines.
2. Habitable building space should be provided along the street frontage to accommodate public space or activated ground floor uses, such as retail or other commercial enterprises, as appropriate.
3. Interior building space programming for new buildings, or for major renovation projects, in urban settings should consider locating critical uses and operations in areas of the building that will minimize the need to place perimeter security in public space.
4. Protection of exterior air-intake systems should be visually and physically integrated into the architecture of the building design. Air-intake protective measures should not prevent access to the building yard or public space nor impede pedestrian circulation.
5. For existing buildings in urban areas, perimeter security barriers should be located within the building yard when the face of the sensitive building to the outside edge of the building yard is a minimum of 20 feet. If the distance from the face of the building to the outside edge of the building yard is less than 20 feet, then perimeter security barriers may be permitted in public space adjacent to that building.
6. The placement of security barriers in public space is discouraged and should be minimized.
7. Existing streetscape, landscape or building site features should be hardened or perimeter security should be integrated into the topography of the site to provide physical perimeter security where feasible. If this not achievable, then security barriers should be integrated into the urban landscape in a manner that minimizes their visual impact and physical infringement into public space.
8. When physical perimeter security elements are located at the edge of the building yard, designs should accommodate visual and physical public access to the building lawn and designated entries.

9. The location and arrangement of security barriers should be compatible with the placement of security barriers for other buildings on the street.
10. The location of perimeter security barriers should minimize interruption of pedestrian circulation. Barriers should not unduly cross sidewalks perpendicularly causing pedestrians to maneuver between them.
11. Perimeter security barriers at intersections, corners and near cross walks or other highly used pedestrian areas should be minimized; barriers that are needed should be located to allow safe pedestrian waiting areas and pedestrian movement.
12. Placement of security barriers should incorporate best design practices and be arranged to:
 - a. Comply with the American Disabilities Act (ADA) and Architectural Barriers Act (ABA);
 - b. provide visual clues to signify important circulation routes and site or building features;
 - c. ensure that the public space is visually and physically accessible;
 - d. provide sufficient clearances to allow access to and from transit stops;
 - e. provide safe pedestrian access to and along sidewalks, public spaces, and building entrances;
 - f. provide emergency access to buildings and emergency evacuation from buildings;
 - g. ensure that maintenance equipment such as snow plows, utility trucks and motorized cleaners can access and maneuver within building yards, sidewalks, and plazas;
 - h. provide at least 2-feet from the face of the curb to the face of the barrier to allow for opening car doors, unloading and loading of passengers, and ease of access to public space.

The best design practices should be based on design industry standards, such as those referenced in Time Savers for Landscape Architects or Time Savers for Architects.

13. Security elements located at the curb, or edge of the sidewalk, should not unduly impede pedestrian access to various permitted sidewalk and street activities, such as cafés, kiosks, demonstration areas, or parade viewing areas along ceremonial streets. The designs must accommodate viewing stands, tents and review stands that are used during significant public events.

C.2. Urban Landscape Contextual Design

14. The design of security barriers, including their mass, form and materials should respond to the architectural and landscape context in which they are located and complement and aesthetically enhance the special character of the associated building and precinct.

15. Physical perimeter security barriers within the building yard should be incorporated into the landscape design and include low walls, fences, seating, landscaping, and other public amenities typically found within the landscape. The design of these barriers should be architecturally compatible with adjacent buildings and respect the overall character of the streetscape.
16. Perimeter security barriers in public space should incorporate decorative tree wells, planters, light poles, signage, benches, parking meters, trash receptacles and other elements and public amenities typically found in a streetscape.
17. Protection of existing trees, including their canopies and root systems, and new street tree planting is encouraged when the plantings will be in context with the existing or the planned streetscape of the corridor. This will minimize the visual impact and the physical intrusion of the security barriers in the urban landscape.
18. The design of perimeter security should respect the building's use, significance and location in the community, as well as established view corridors.
19. Perimeter security design should strive for continuity, consistency and enhancement of the overall streetscape.
20. Perimeter security design should avoid relying on repetitive use of single elements, such as continuous rows of bollards or planters.
21. Physical perimeter security should follow design principles to achieve a sense of openness, balance, rhythm, and hierarchy that will improve way finding and visual linkages along a street and enhance the pedestrian experience. For example, elements can be designed and placed to signify primary or secondary pedestrian entrances.
22. Perimeter security barriers should be designed as a family of beautiful functional streetscape elements that also function as a public amenity.
23. Physical perimeter security projects (located in areas with a previously approved streetscape program) should be designed to be consistent with the design intent of the streetscape standards of that associated area.
24. Security barrier design (placement, height, spacing, dimensional volume, structural integrity and other physical characteristics) should respond to the identified threats as well as specific building and site conditions, relational vehicle design speeds and angles-of-approach and pavement types.
25. Curbs, copings and retaining walls should be incorporated into the design of security barriers to reduce the perceived height of the barrier.

C.3. Vehicular and Pedestrian Controls

26. Pedestrian screening security operations should not be conducted in public space. If building additions or renovations are required to accommodate this function, the new construction should be compatible with the existing architecture and should not project into L'Enfant Plan rights-of-way, other public space, or view-sheds.
27. Guard booths should be integrated into, and designed in context with, the site and building design. When feasible, guard booths should be located in the building yard; where the depth of the building yard is insufficient, the guard booth should be located to minimize interruption of pedestrian movement along the pathway.
28. Vehicular controls at building entries, such as vehicle barriers and guard booths should be located so that pedestrian movement along sidewalks is not blocked. Check points should be designed to allow off-street queuing space that does not block pedestrian movement or traffic flow.
29. Vehicular control measures that are visible from public space should be attractively designed and mechanical equipment should be hidden. Solid hydraulic plate barriers should only be used in locations that are not highly visible from public space.
30. Signage, electronic signals or other control measures should be integrated into vehicular barriers and guard booths to minimize visual clutter.

C.4. Comprehensive Streetscape Design

The National Capital Urban Design and Security Plan is predicated on a design framework that defines contextual areas and special streets. Special streets, recognized as the monumental avenues and diagonal streets in the L'Enfant Plan are the great linear connectors of the city and provide an important symbolic and ceremonial function in the nation's capital. Ideally, the physical perimeter security for buildings on these monumental and diagonal streets should be designed collectively as a contextually appropriate cohesive streetscape. In the absence of funding to design the entire streetscape, it is incumbent upon the federal agencies to coordinate their design solutions with their neighbors along the street and consider the larger context.

31. The Capital's monumental avenues, such as Pennsylvania, Constitution, Independence, Maryland, Virginia and New Jersey Avenues should receive special treatment to ensure that security projects are addressed comprehensively, emphasizing the streetscape as a whole with attention to their axiality and formality.
32. Diagonal Avenues should be treated in a manner that emphasizes their landscape features, including significant tree and ground plantings.

33. Special streets (such as Pennsylvania, Constitution, Independence and Maryland Avenues), or those that are included in special planning areas (such as 10th Street SW, 7th Street NW, and F Street NW) should be treated in a manner that reinforces their linkages, unique conditions and individual character.
34. Grid streets should be treated in a manner that builds upon existing streetscape standards and minimizes the contrast between security and streetscape elements.

Terminology

The terms below are defined for use with this document:

- **Bollard.** (Pronounced bol'rd). A post set in a series to prevent vehicular access or to protect property from damage by vehicular encroachment. A bollard is sometimes used to direct traffic. The term is nautical in origin and is a post on a dock, wharf, ship or tug used for securing lines.
- **Building Yard.** The area between the sidewalk and the face of the building, typically expressed as lawn area, landscape area, or paved plaza area, that may be in public or private ownership.
- **Campus.** A group of buildings in an open or park-like setting that house various functions serving an common use or mission.
- **Explosive devices.** Various forms of explosive materials carried in a container that is transported by persons, such as package bombs, suitcase bomb, suicide-vests or other similar devices, or when the explosive is transported in a vehicle.
- **Environmental hazards.** Forms of terrorism carried out through chemical, biological and radiological attack.
- **Essential for immediate continuity of critical government operations.** Those operations deemed essential to protect national security, and the safe keeping of essential resources, facilities and records necessary for the continuity of governmental functions that exercise civil authority and provide vital services to maintain the safety of the public.
- **Federal Facilities.** Buildings, installations, structures, land owned or leased by the federal government, monuments and memorials.
- **Federally Leased Space.** Buildings, and land incidental thereto, for which the federal government has a right of occupancy by having a leasehold interest.
- **Federally Owned Space.** Buildings, and land incidental thereto, the title to which is vested, or which will become vested, pursuant to existing agreement, in the federal government.

- **Harden.** A construction method to increase the strength of a structural element that reduces vulnerability to external blasts.
- **Intelligence Information.** Information that identifies detects and assesses the nature and scope of terrorist threats in relation to actual and potential vulnerabilities of the homeland.
- **Monumental Core.** The area encompassing the Capitol grounds, the Mall, the Washington Monument grounds, the White House grounds, the Ellipse, West Potomac Park, East Potomac Park, the Southwest Federal Center, the Federal Triangle area, President’s Park, the Northwest Rectangle, Arlington Cemetery and the Pentagon area, Fort Myer and Henderson Hall.
- **National Capital Region.** The District of Columbia; Montgomery and Prince George’s Counties in Maryland; Arlington, Fairfax, Loudoun, and Prince William Counties in Virginia; and all cities now or hereafter existing in Maryland or Virginia within the geographic area bounded by the outer boundaries of the combined area of said counties. This definition is set in the National Capital Planning Act of 1952.
- **Operational Controls or Procedural Security Measures.** Risk management strategies that require established procedures to be performed by personnel, or strategies that can be performed electronically, or mechanically and monitored by personnel, including but not limited to surveillance, vehicle screening and emergency egress.
- **Physical Security Measures.** Risk management strategies that include physical modification to a building or construction of a building such as structural engineering, window glazing, or strategies that include construction within the area around a building, such as structural engineering of landscape or streetscape features, vehicular control devices or other similar measures.
- **Precinct.** An area dominated by a single land use or associated uses, or an area that is dominated by a particular architectural style or landscape character.
- **Risk Assessment.** An analysis of the potential for loss or damage to an asset that includes evaluating the interrelationship between the value of an asset, the threats against it, and its vulnerability to each applicable hazard and threat.
- **Security Measure.** The general term that refers to a number of potential risk management strategies to increase protection of an asset; such as intelligence information, operational or procedural controls, or physical design.
- **Standoff.** The distance between an asset and a threat.
- **L’Enfant Street** – Streets identified in L’Enfant’s plan for the city embody the designs and plans for the original City of Washington and, which were promulgated by President George Washington and recognized by Congress as the general work of Pierre Charles L’Enfant,

Andrew Ellicott and Benjamin Banneker, notably as subsequently laid out by the Office of the Surveyor of the District of Columbia government according to the “King Plats of the City of Washington in the District of Columbia, 1803.”

- **Suburban area/ setting** – Settings that are typically recognized as dispersed low-density to mid-density development that separates residential, commercial and services by clustering like uses in a manner that makes vehicular use essential for movement of people and goods. Buildings are setback from property lines and parking is concentrated, often in large surface parking lots.
- **Threat Assessment.** The evaluation of threats based upon numerous characteristics such as history, magnitude of a threat, and capability of the entity or individual seeking to carry out the threat.
- **Urban area or setting.** Settings recognized as the concentration of mid-density to high-density development that supports horizontally and vertically integrated mix of uses for shopping, entertainment, business, services, cultural, and housing opportunities. The building mass, organization, orientation and build-to lines create spatial definition along streets, squares and circles to create a pedestrian environment that supports multi-modal forms of mass transportation and where parking is typically concentrated in parking garages.
- **Vulnerability Assessment.** The evaluation of characteristics that contribute to and mitigate the susceptibility of an asset to damage or weakness that can be exploited by an aggressor.

CARLYLE TOWERS

November 1, 2011

U. S. General Services Administration, Public Buildings Service
Attention: Ms. Angela Mar, NEPA Program Specialist
301 7th Street, SW, Room 2002
Washington, DC 20407
Angela.Mar@gsa.gov

Ms. Mar,

I am writing to you on behalf of the Carlyle Towers Condominium Unit Owners Association (CTCUOA), located at 2151 Jamieson Avenue, Alexandria, VA 22314. We are responding to your request for comments regarding the Environmental Assessment for the proposed perimeter security improvements at the Albert V. Bryan U.S. Courthouse, located at 2100 Jamieson Avenue, Alexandria, VA.

Our concerns are as follows:

1. The Assessment should clearly state that this is an agreement between the government and the Carlyle Community Council (CCC); who is the land owner. The agreement does not constitute a transfer of ownership.
2. The Assessment should further state that everything will revert back to CCC under agreed upon conditions (the potential return should be addressed).
3. In the final analysis, it should be noted that enhancing the safety of the courthouse will directly affect the safety of CTCUOA. Constructing a blast wall on the east side of Jamieson Avenue would deflect any blast towards the west and the more densely populated CTCUOA. Potential death to citizens in order protect those in the courthouse is the most extreme of environmental hazards.
4. Parking on either side of Jamieson Avenue should be prohibited.

We appreciate the opportunity to express our concerns. If you have any questions, please do not hesitate to contact our General Manager, Scott Rosenbloom.

Thank you.

Sincerely,



Gerald Binker
President, CTCUOA



COMMONWEALTH of VIRGINIA

Department of Historic Resources

Douglas W. Domenech
Secretary of Natural Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Kathleen S. Kilpatrick
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
TDD: (804) 367-2386
www.dhr.virginia.gov

November 2, 2011

Ms. Angela Mar, NEPA Program Specialist
U.S. General Services Administration, Public Buildings Service
301 7th Street, SW, Room 2002
Washington, D.C. 20407

Re: Perimeter Security Improvements at Albert V. Bryan U.S. Courthouse
2100 Jamieson Avenue, Alexandria, Virginia
DHR File No. 2011-1805

Dear Ms. Mar,

On October 21, 2011, the Virginia Department of Historic Resources (DHR) received information regarding the above referenced project for our review and comment pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. DHR understands that the General Services Administration (GSA) intends to prepare an Environmental Assessment (EA) for the proposed perimeter security improvements at the Albert V. Bryan U.S. Courthouse in Alexandria, Virginia. The project will update the required level of security at the site, while enhancing the landscaping of the site and the removal temporary security features.

In addition to NEPA, GSA has responsibilities as a federal agency under Section 106. Unfortunately, your scoping letter provides little information that would help us assist you in considering the effects of the project on historic properties. We recommend that you consult with Gary Porter, Historic Preservation Specialist, at GSA, to assist you in submitting a project review application. We also suggest you consult with the Office of the City Archaeologist in Alexandria.

You are welcome to submit an application for review under Section 106 through our new electronic project submission system, known as ePIX. Please use the following link: <http://apps.cao.virginia.gov/epix/>. And be please sure your application is complete with the following items: project description, APE, completed DSS archives search, photos, and any available site and construction plans.

Should you have any additional questions, please feel free contact me at (804) 482-6084, or via email at andrea.kampinen@dhr.virginia.gov.

Sincerely,

Andrea Kampinen
Architectural Historian, Office of Review and Compliance

Cc: Gary Porter, GSA

Administrative Services
10 Courthouse Ave.
Petersburg, VA 23803
Tel: (804) 862-6416
Fax: (804) 862-6196

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Roanoke Region Office
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APPENDIX B: SECTION 106 CONSULTATION

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December 7, 2011

Ms. Andrea Kampinen
Office of Review and Compliance
Department of Historic Resources
Commonwealth of Virginia
2801 Kensington Avenue
Richmond, VA 23221

Re: Perimeter Security Improvements at the Albert V. Bryan U.S. Courthouse
2100 Jamieson Avenue, Alexandria, Virginia
DHR File No. 2011-1805

Dear Ms. Kampinen:

The United States Marshal Service (USMS) is proposing to install permanent perimeter security at the Albert V. Bryan (AV Bryan) Courthouse located at 2100 Jamieson Avenue in Alexandria, Virginia. The courthouse was constructed in 1995 by the U.S. General Services Administration (GSA) and GSA now serves as the U.S. Government's representative for the operation of the facility. It is in this capacity that GSA is submitting the enclosed project information in accordance with 36CFR Part 800 for section 106 consultation.

Project Description: The proposed perimeter security concept for the AV Bryan Courthouse will replace the existing temporary security measures on Jamieson Avenue, Courthouse Square South and Elizabeth Lane. On Jamieson Avenue, a hardened garden fence would be installed between the face of the building and the inside of the sidewalk. The existing curb-line would be moved to the west, allowing for the expansion of the existing planting bed along the face of the building and the potential preservation of the existing mature street trees. Courthouse Square South is currently closed to vehicular traffic. Under this concept, the roadway width would be narrowed slightly to expand the pedestrian circulation space and the road would be reopened to vehicular traffic. In addition, a combination of hardened garden fence panels and bollards would be installed just inside of the curb-line. The existing planting bed along the face of the building would be maintained and street trees would be planted that would frame the building's primary entrance. On Elizabeth Lane, a line of ornamental fence segments and bollards would be added just inside of the existing curb, and a consistent line of street trees would be established.

Archeological Resources: At the time of the Courthouse construction GSA contracted for Phase I, II & III archaeological investigations with Engineering Science. The initial survey of the area was undertaken in order to determine whether the historical ground surface and archaeological remains were present below the modern-era fill. An archaeological site, 44AX164, was identified beneath approximately 15 feet of fill as a result of these investigations. The site included both prehistoric and historic components, indicating occupation during the Late Archaic and Woodland Periods, and then again in the late 18th through the late 19th centuries.

The prehistoric component of the site consisted of a light scatter of artifacts dating from the Late Archaic and Woodland Periods. The type of artifacts suggests that the site was used for the manufacture of tools. The limited number of artifacts indicates that the site probably functioned as a temporary camp.

The historic period artifacts suggest a subsequent occupation in the late 18th and 19th centuries. At this time, the project site lay in a transitional zone between urban development in the City of Alexandria and the rural landscape of Fairfax County, within or at the edge of the unincorporated village of West End. Based on the artifacts collected, the Courthouse property may have been the site of a small residential occupation or outbuilding, likely belonging to either tenant farmers or workers in the businesses along Little River Turnpike, but it was not possible to associate the archaeological deposits with an occupation known from historical documentation. In the excavation, buried historical soil was identified as a plow zone, indicating that the site was used for agricultural purposes after the end of the historic occupation. The cultivation of the land likely ended around 1897 when the property was purchased by the Southern Railroad Company.

Since Phase III data recovery was undertaken across the Courthouse site prior to the construction of the building, the proposed perimeter security improvements would occur entirely within this area that has already been subject to archaeological study. Any archaeological potential that the project area had was exploited by the previous data recovery. It is no longer considered to be sensitive for archaeological resources.

Historical Resources: The AV Bryan Courthouse lies within the Carlyle development, a mixed-use urban community constructed in the 1990s on the site of a former rail yard. No historic properties lie within the immediate vicinity of the site nor does the courthouse fall within any of the city's historic districts. Given the property's tightly defined urban context, and thus limited visibility, there would be no impacts to historic resources as a result of the perimeter security improvements.

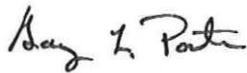
In a letter dated October 21, 2011, GSA notified the Virginia State Historic Preservation Office (VA SHPO) of its intention to conduct an Environmental Assessment for the proposed perimeter security improvements at the AV Bryan Courthouse. To ensure coordination with the National Environmental Policy Act (NEPA) GSA will include an analysis of impacts on cultural resources in accordance with 36CFR Part800.8. However, based on the absence of historic resources in the

project area and our prior archeological investigations, it is GSA's determination that the proposed undertaking will have **no** adverse effect on historic or archaeological resources.

Enclosed is an aerial image of the project area, proposed site plan, Alexandria Historic District Boundaries Map and existing streetscape images.

If you have any questions or require additional information please contact me at 202-205-7766 or gary.porter@gsa.gov. We look forward to working with your office on this project.

Sincerely,



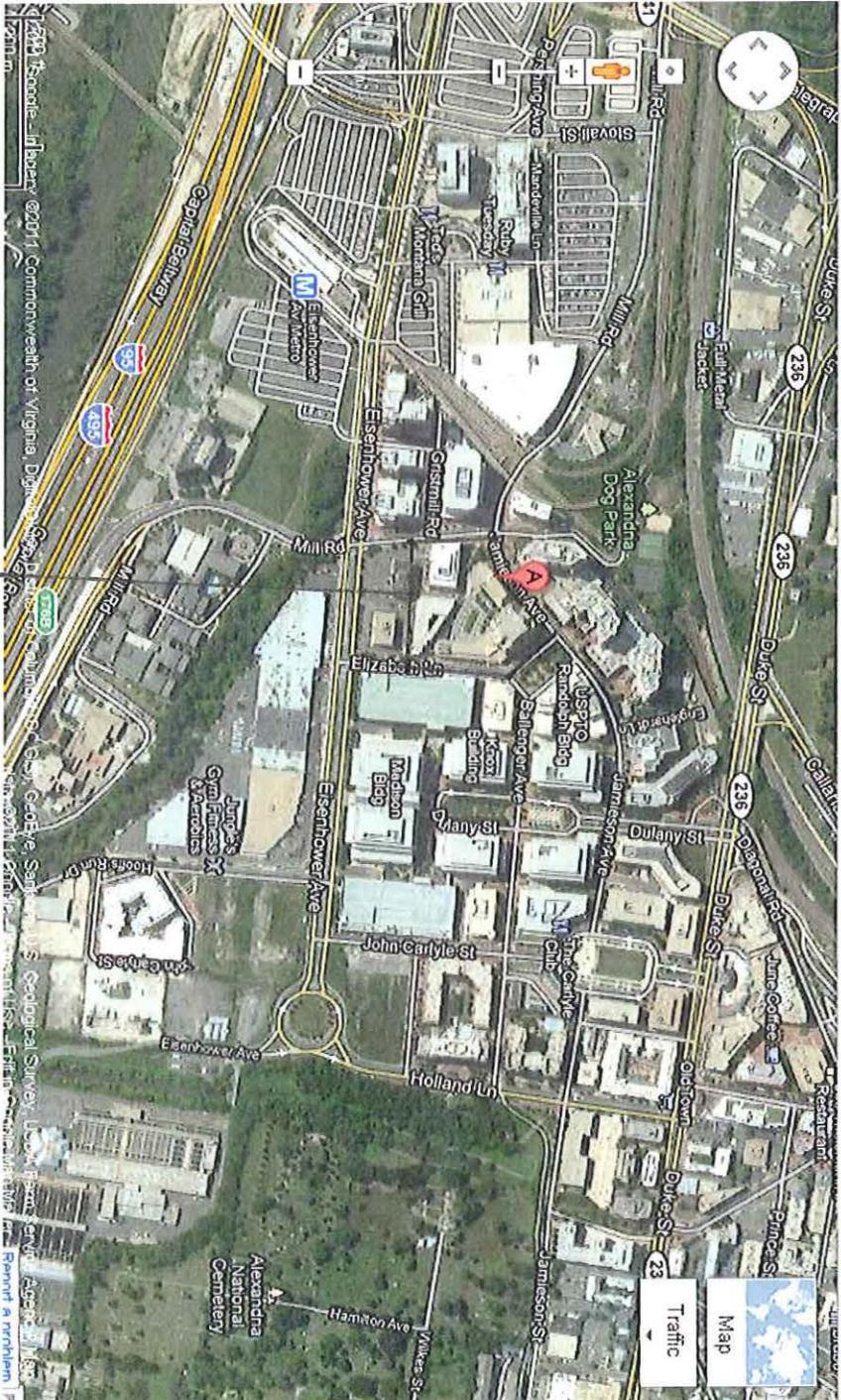
Gary L. Porter
Historic Preservation Specialist
National Capital Region

Enclosures

CC

Ms. Catherine Miliaras
Department of Planning and Zoning
Alexandria, VA 22314

Mr. Garrett R. Fesler
Alexandria Archaeology
Alexandria, VA 22314



AV Bryan Courthouse
Project Area



- Existing park to remain
- Proposed outline
- Retractable balliads
- Hardened garden fence
- Planting area and street trees
- Balliads at corners
- Hardened garden fence
- Curbside planting area
- Proposed outline
- Planting area
- Existing trees to remain
- Street light
- Guard booth to remain
- Retractable balliads
- Existing trees to remain
- Building ventilation to remain
- Hardened garden fence
- Planting area
- Existing planting area to remain
- Existing balliads to remain
- Guard booth to remain
- Delta barrier relocated from Jamieson Avenue

- Retractable balliads
- Elevated crosswalk
- Hardened garden fence
- Brick pavement
- Change in pavement to accent entry
- Existing planting area to remain
- Law enforcement vehicle parking zone

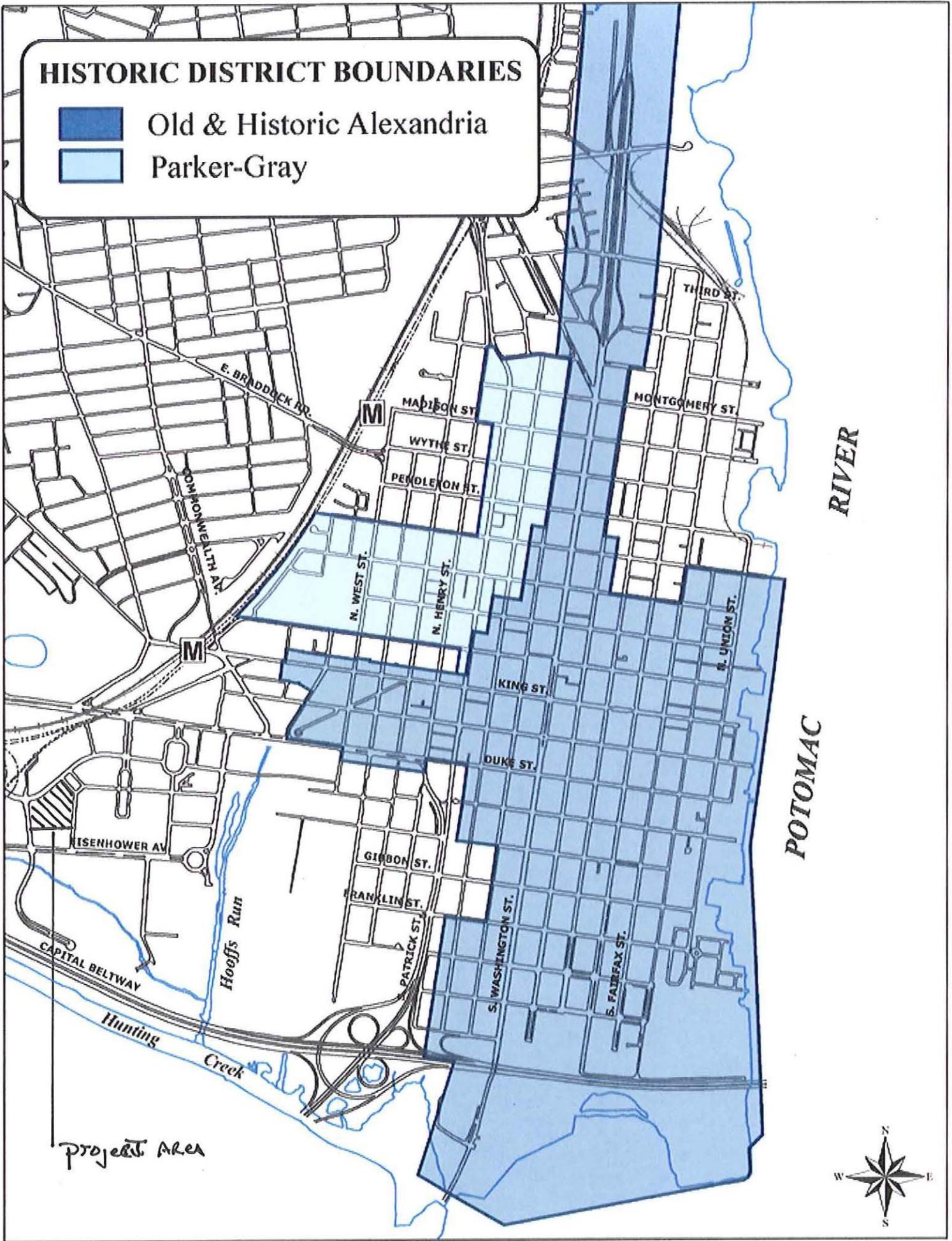
- Street trees
- Balliads connected by ornamental fence segments
- Street light
- Existing balliads to remain
- Delta barrier
- Guard booth to remain

Albert V. Bryan Courthouse
 Perimeter Security Improvements
 October 26, 2011



HISTORIC DISTRICT BOUNDARIES

-  Old & Historic Alexandria
-  Parker-Gray



POTOMAC RIVER

POTOMAC RIVER

Project Area



AV Bryant Courthouse Existing Streetscape



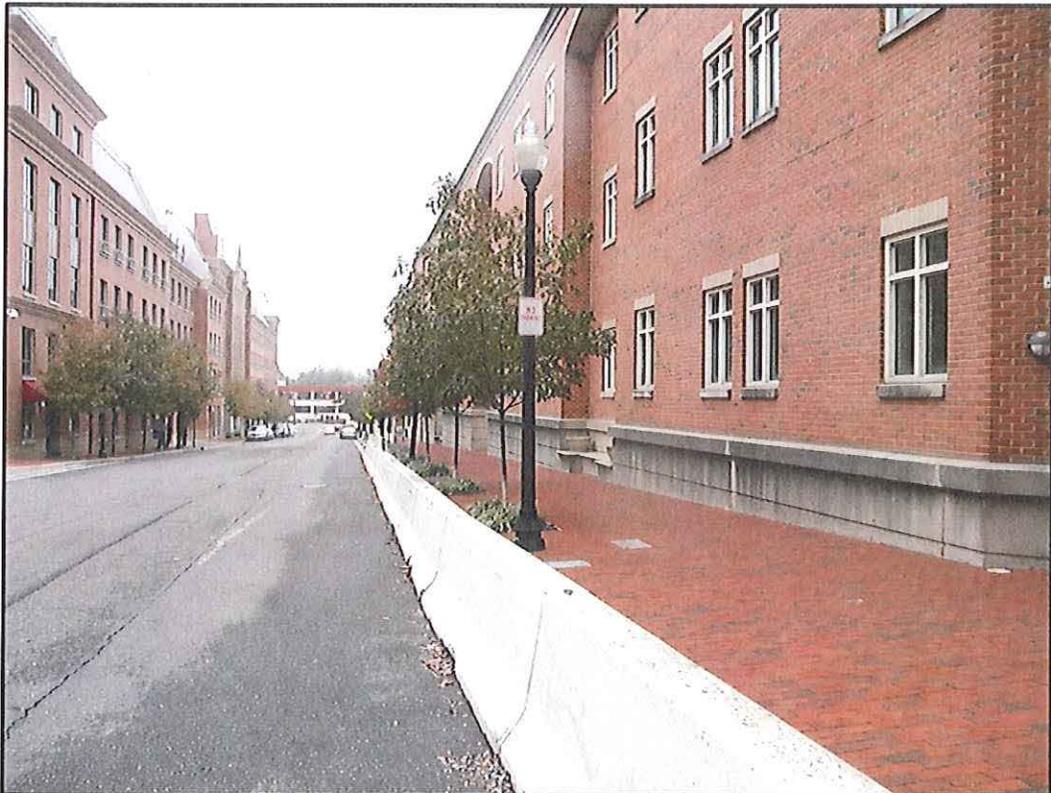
Southern Edge of Courthouse Square



Elizabeth Lane North



Elizabeth Lane South



Jamison Avenue North



Jamison Avenue South





COMMONWEALTH of VIRGINIA

Department of Historic Resources

Douglas W. Domenech
Secretary of Natural Resources

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January 19, 2012 (rev. from January 9, 2012)

Mr. Gary Porter, Historic Preservation Specialist
U.S. General Services Administration, Public Buildings Service
301 7th Street, SW, Room 2002
Washington, D.C. 20407

Re: Perimeter Security Improvements at Albert V. Bryan U.S. Courthouse
2100 Jamieson Avenue, Alexandria, Virginia
DHR File No. 2011-1805

Dear Mr. Porter,

On December 12, 2011, the Virginia Department of Historic Resources (DHR) received information regarding the above referenced project for our review and comment pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. DHR understands that the General Services Administration (GSA) intends to prepare an Environmental Assessment (EA) for the proposed perimeter security improvements at the Albert V. Bryan U.S. Courthouse in Alexandria, Virginia. The project will update the required level of security at the site, while enhancing the landscaping of the site and the removal temporary security features. Specific project components include the installation of a hardened garden fence between the building and the sidewalk; moving the existing curb-line to the west; opening Courthouse Square South to vehicular traffic once again; and bollard and ornamental fence installation.

Based upon a review of the information provided, DHR recommends that No Historic Properties will be affected by the proposed project. Should you have any additional questions, please feel free contact me at (804) 482-6084, or via email at andrea.kampinen@dhr.virginia.gov.

Sincerely,

A handwritten signature in cursive script that reads "Andrea Kampinen".

Andrea Kampinen
Architectural Historian, Office of Review and Compliance

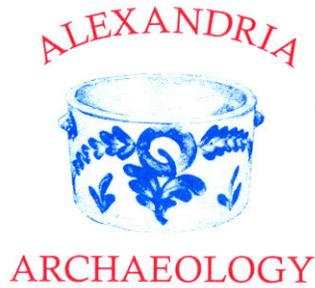
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December 14, 2011

Gary L. Porter
Historic Preservation Specialist
National Capital Region
US General Services Administration
301 7th Street SW
Washington, D.C.
20407-0001

Re: Perimeter Security Improvements at the Albert V. Bryan U.S. Courthouse
2100 Jamieson Avenue, Alexandria, Virginia
DHR File No. 2011-1805

Dear Mr. Porter,

Thank you for providing our office with information regarding this project. We have reviewed our files for information pertaining to potential impact the project may have on cultural resources. Engineering Science, Inc. conducted intensive archaeological investigations on the property in 1991 and 1992 (at site 44AX0164) prior to construction of the courthouse and resulted in a final report in 1993. Significantly, the archaeological deposits were recovered from beneath approximately 15 ft. of fill.

In terms of nearby historical resources that may be impacted by the proposed security improvements, we have reviewed our files and find no evidence of identified historic properties in the vicinity that will suffer from an indirect effect.

Given the fact that the archaeological potential of the property has been exhausted, and the proposed security improvements will not cause an adverse impact to nearby cultural resources, our office agrees that the proposed undertaking will have no effect on historic or archaeological resources.

Sincerely,

Garrett R. Fesler, Ph.D.

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APPENDIX C: COASTAL ZONE MANAGEMENT ACT FEDERAL CONSISTENCY DETERMINATION

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GSA National Capital Region

Ms. Ellie Irons
Program Manager
Office of Environmental Impact Review
Department of Environmental Quality
Commonwealth of Virginia
P.O. Box 1105
Richmond, VA 23218

Subject: Federal Consistency under the Coastal Zone Management Act

Dear Ms. Irons:

This letter responds to a comment letter received from Ms. Ellie Irons dated, October 31, 2011 regarding the review process of the Federal Consistency Determination for the Albert V. Bryan U.S. Courthouse Perimeter Security Improvements Project.

In accordance with Section 307(c)(1) of the Federal Coastal Zone Management Act of 1972, as amended, enclosed is the Federal Coastal Consistency Determination for implementation of perimeter security improvements at the Albert V. Bryan U.S. Courthouse in the City of Alexandria, Virginia.

The U.S. General Services Administration (GSA) has determined that the proposed action is consistent, to the maximum extent practicable, with the enforceable policies of the Virginia Coastal Resource Management Program.

If you have further question on this project, please contact Ms. Angela Mar at (202) 205-4668, or Ms. Stephanie Dyer-Carroll at (703) 739-6906. Ms. Dyer-Carroll represents our environmental consultant AECOM.

Sincerely,

A handwritten signature in black ink, appearing to read "Suzanne Hill".

Suzanne Hill
NEPA Program Lead
Public Buildings Service

Enclosure: 1. Coastal Zone Management Act Federal Consistency Determination

U.S. General Services Administration
301 7th Street SW
WASHINGTON, DC 20407-0001
WWW.GSA.GOV

Coastal Zone Management Act (CZMA) Federal Consistency Determination

This document provides the Commonwealth of Virginia with GSA's Consistency Determination under Coastal Zone Management Act (CZMA) section 307(c)(1) [or (2)] and 15 CFR Part 930, subpart C, for the Albert V. Bryan U.S. Courthouse (A.V. Bryan Courthouse) Perimeter Security Improvements Project. The information in this Consistency Determination is provided pursuant to 15 CFR §930.39.

PROPOSED FEDERAL AGENCY ACTION

GSA proposes to implement permanent perimeter security measures at the A.V. Bryan Courthouse located at 2100 Jamieson Avenue in the City of Alexandria, VA (Figures 1 and 2). The A.V. Bryan Courthouse lies within the City's Carlyle District, a moderately dense urban mixed-use neighborhood that was built in the 1990s on a former brownfields site. Implementation of the proposed security measures would include hardscape and landscape alterations and the installation of physical security infrastructure.

The area in which the permanent security measures would be installed is approximately 1.4 acres, excluding the courthouse itself, and contains both public rights-of-way and GSA property between the courthouse's existing security perimeter and the courthouse building (Figure 3). The majority of the surfaces in the area are paved, and vegetation is limited to small planting areas with shrubs, street trees, and areas of maintained lawn.

Under the proposed action, permanent perimeter security elements would be provided along three sides of the building, on Jamieson Avenue, Courthouse Square South, and Elizabeth Lane (Figure 4). On Jamieson Avenue, a hardened garden fence would be installed between the face of the building and the inside of the sidewalk. The existing curblin would be moved to the west, allowing for the expansion of the existing planting bed along the face of the building and the potential preservation of the existing mature street trees. Courthouse Square South is currently closed to vehicular traffic. Under the proposed action, the roadway width would be narrowed slightly to expand the pedestrian circulation space and the road would be reopened to vehicular traffic. In addition, a combination of hardened garden fence panels and bollards would be installed just inside of the curblin. The existing planting bed along the face of the building would be maintained and street trees would be planted that would frame the building's primary entrance. On Elizabeth Lane, a line of ornamental fence segments and bollards would be added just inside of the existing curb, and a consistent line of street trees would be established.

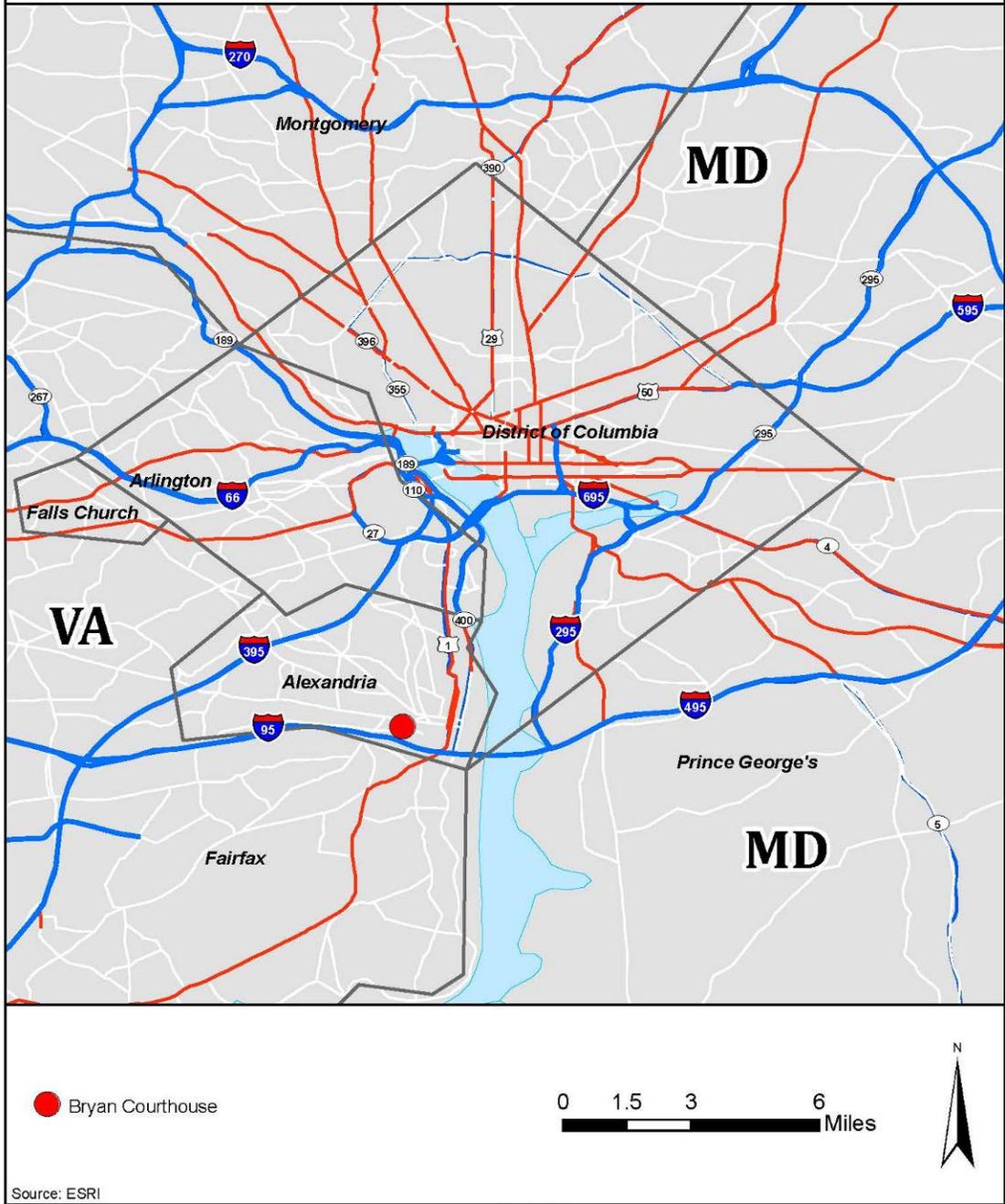
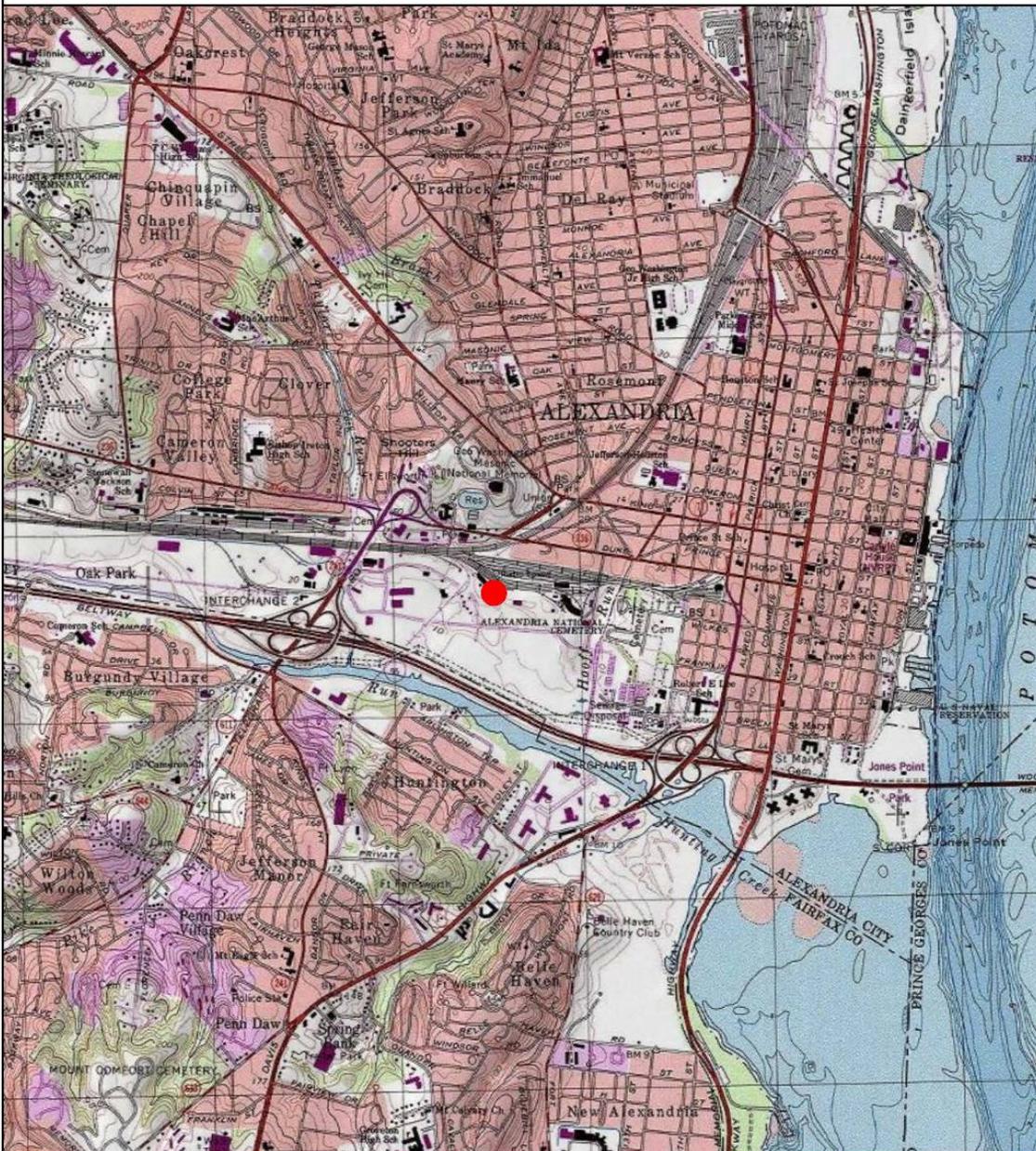


Figure 1
Regional Location

Location of Bryan Courthouse



● Bryan Courthouse

0 1,250 2,500 5,000 Feet



Source: USGS Alexandria Quadrangle

Figure 2
Location within Alexandria



Figure 3
Existing Site Conditions



Figure 4
Proposed Perimeter Security Improvements

PURPOSE

The A.V. Bryan Courthouse was built in 1995 and lacks many of the exterior physical security measures that are now routinely integrated into the design and construction of federal facilities in comparable urban settings. Existing perimeter security measures at the courthouse primarily consist of temporary concrete traffic barriers, which do not provide the needed level of security, disrupt pedestrian and vehicular movements around the site, and greatly detract from the facility's physical appearance. The purpose of the proposed security improvements is to establish the necessary level of security for the A.V. Bryan Courthouse while improving pedestrian and vehicular circulation, better integrating the courthouse into the urban context of the surrounding neighborhood, and allowing for the removal of temporary security measures.

ENFORCEABLE REGULATORY PROGRAMS COMPRISING VIRGINIA'S COASTAL ZONE MANAGEMENT PROGRAM

GSA has determined that the proposed perimeter security improvements at A.V. Bryan Courthouse would have minimal effect on the land or water uses or natural resources of the Commonwealth of Virginia's coastal zone. The following discussion provides an assessment of the potential effects of the perimeter security improvements and an analysis of the proposed action's consistency with each of the nine enforceable policies and mechanisms of the Virginia Coastal Resources Management Program. The proposed perimeter security improvements at the A.V. Bryan Courthouse affect the land or water uses or natural resources of Virginia in the following manner:

FISHERIES MANAGEMENT

The Fisheries Management program stresses the conservation and enhancement of finfish and shellfish resources and the promotion of commercial and recreational fisheries to maximize food production and recreational opportunities. This program is administered by the Virginia Marine Resources Commission (MRC) (Virginia Code §28.2-200 through §28.2-713) and the Department of Game and Inland Fisheries (DGIF) (Virginia Code §29.1-100 through §29.1-570).

The State Tributyltin (TBT) Regulatory Program has been added to the Fisheries Management program. The General Assembly amended the Virginia Pesticide Use and Application Act as it related to the possession, sale, or use of marine antifoulant paints containing TBT. The use of TBT in boat paint constitutes a serious threat to important marine animal species. The TBT program monitors boating activities and boat painting activities to ensure compliance with TBT regulations promulgated pursuant to the amendment. The MRC, DGIF, and Virginia Department of Agriculture Consumer Services (VDACS) share enforcement responsibilities (Virginia Code §3.1-249.59 through §3.1-249.62).

No surface waters are located on or within 0.25 mile of the site of the proposed action (Figure 5). Therefore, the proposed action would not adversely affect the conservation and enhancement of finfish and shellfish resources or the promotion of commercial or recreational fisheries. In addition, the proposed action would not involve the use of paints containing TBT.

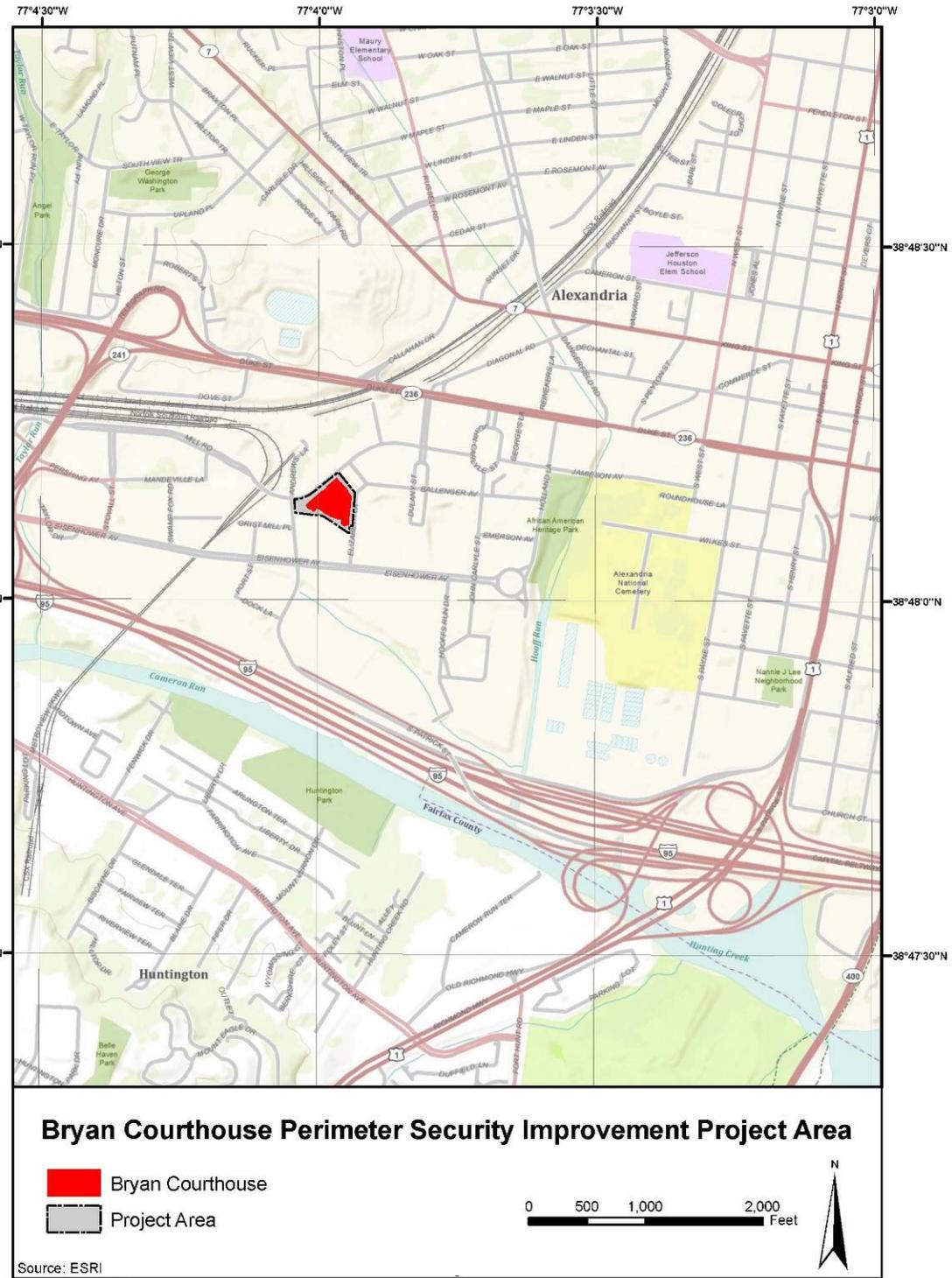


Figure 5
Site Context

SUBAQUEOUS LANDS MANAGEMENT

The management program for subaqueous lands establishes conditions for granting or denying permits to use state-owned bottomlands based on considerations of potential effects on marine and fisheries resources, tidal wetlands, adjacent or nearby properties, anticipated public and private benefits, and water quality standards established by the Department of Environmental Quality (DEQ) Water Division. The program is administered by the MRC (Virginia Code §28.2-1200 through §28.2-1213).

The proposed action would not encroach in, on or over state-owned subaqueous lands.

WETLANDS MANAGEMENT

The purpose of the wetlands management program is to preserve wetlands, prevent their despoliation, and accommodate economic development in a manner consistent with wetlands preservation. The tidal wetlands program is administered by the MRC (Virginia Code §28.2-1301 through §28.2-1320). The Virginia Water Protection Permit program administered by DEQ includes protection of wetlands --both tidal and non-tidal. This program is authorized by Virginia Code § 62.1-44.15.5 and the Water Quality Certification pursuant to Section 401 of the Clean Water Act.

The A.V. Bryan Courthouse lies within a highly urbanized setting (Figure 6). The National Wetlands Inventory (NWI) Wetlands Mapper indicates that there are no wetlands located on or in the immediate vicinity of the site. Site visits by environmental specialists have verified information presented within the NWI. Therefore, the proposed action would have no effect on wetlands.

DUNES MANAGEMENT

Dune protection is carried out pursuant to the Coastal Primary Sand Dune Protection Act and is intended to prevent destruction or alteration of primary dunes. This program is administered by the MRC (Virginia Code §28.2-1400 through §28.2-1420).

The project site is not located on or near beaches or dunes. Therefore, the proposed action would not affect dunes.

NON-POINT SOURCE POLLUTION CONTROL

Virginia's Erosion and Sediment Control Law requires soil-disturbing projects to be designed to reduce soil erosion and to decrease inputs of chemical nutrients and sediments to the Chesapeake Bay, its tributaries, and other rivers and waters of the Commonwealth. This program is administered by the Department of Conservation and Recreation (DCR) (Virginia Code §10.1-560 et seq.).

Demolition and construction activities associated with implementation of the perimeter security improvements would disturb approximately 0.6 acre of the existing 1.4-acre site. The site and its immediate vicinity are almost entirely covered with impervious surfaces – buildings, sidewalks, vehicle driveways, and roadways. Construction of the perimeter security improvements would include expansion of some existing planting areas and installation of new planting areas, which would result in a decrease in impervious surface on the site of about 0.13 acre (9.4%), depending on the final layout of sidewalks, driveways, and planting areas.

Local Setting of Bryan Courthouse

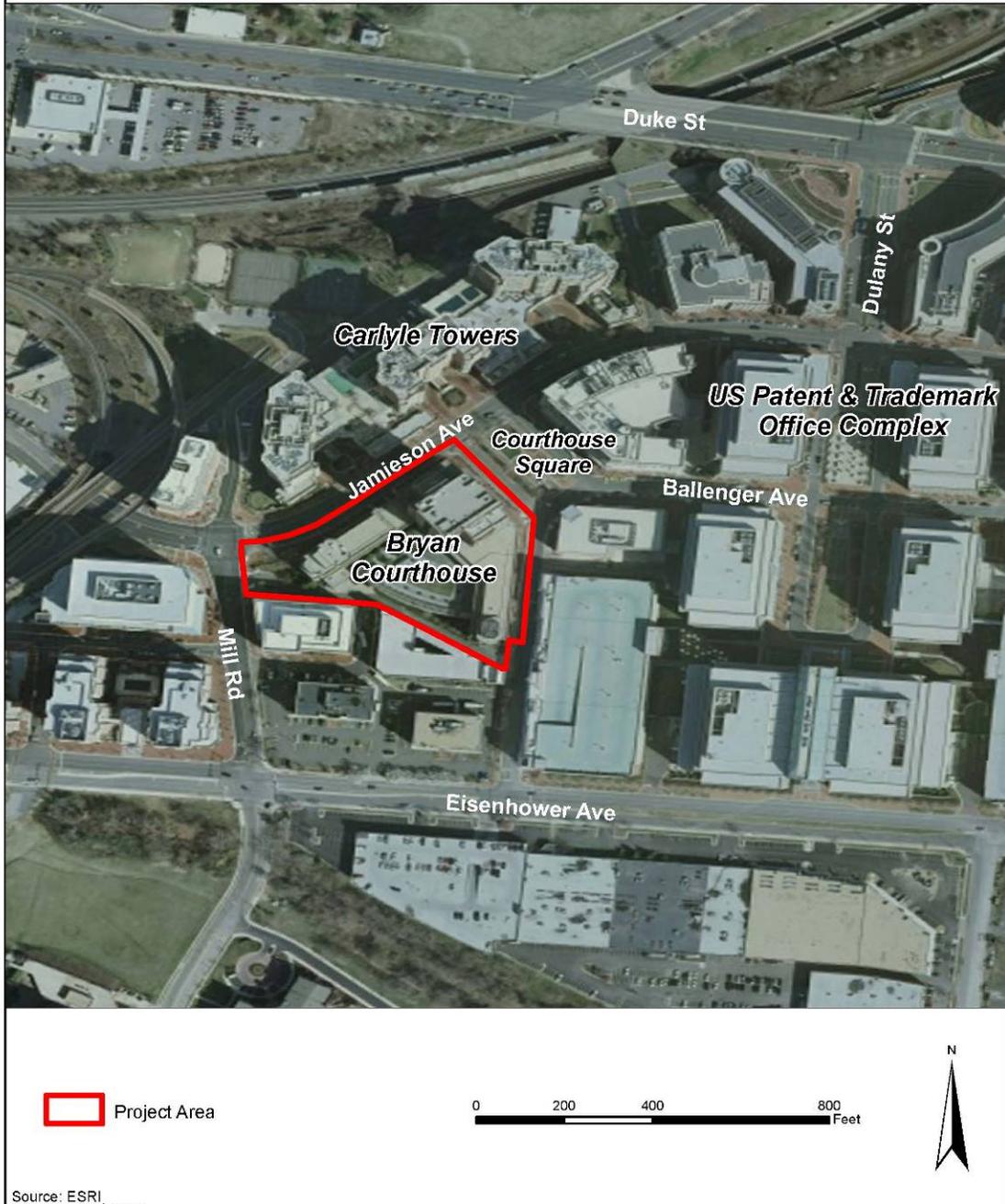


Figure 6
Local Setting

The proposed security improvements would adhere to state criteria for stormwater management and water quality as stipulated in Virginia Stormwater Management Regulations and Virginia Erosion and Sediment Control Regulations. A stormwater management plan would be developed in accordance with the Virginia Department of Conservation and Recreation (VDCR) Soil and Water Conservation Program guidelines as well as GSA guidance to incorporate low impact development strategies.

Because more than 2,500 square feet of land would be disturbed, GSA would prepare and implement an Erosion and Sediment Control Plan in compliance with the Virginia Erosion and Sediment Control Law and its implementing regulations. Soil erosion and sedimentation control best management practices (BMPs) would be employed at the site during construction to minimize impacts.

POINT SOURCE POLLUTION CONTROL

The point source program is administered by the State Water Control Board pursuant to Virginia Code §62.1-44.15. Point source pollution control is accomplished through the implementation of the National Pollutant Discharge Elimination System (NPDES) permit program established pursuant to §402 of the federal Clean Water Act and administered in Virginia as the Virginia Pollutant Discharge Elimination System (VPDES) permit program. The Water Quality Certification requirements of §401 of the Clean Water Act of 1972 is administered under the Virginia Water Protection Permit program.

The proposed perimeter security improvements would not require additional plumbing connections to the sanitary sewer system serving the A.V. Bryan Courthouse. Any stormwater runoff that is not absorbed on site would be conveyed via the City of Alexandria's municipal separate storm sewer system, which is covered by a VPDES permit.

SHORELINE SANITATION

The shoreline sanitation program regulate the installation of septic tanks, set standards concerning soil types suitable for septic tanks, and specify minimum distances that tanks must be placed away from streams, rivers, and other waters of the Commonwealth. This program is administered by the Department of Health (Virginia Code §32.1-164 through §32.1-165).

Construction of the perimeter security improvements would not include the demolition or installation of septic tanks. As such, there would be no effect to shoreline sanitation.

AIR POLLUTION CONTROL

The air pollution control program implements the federal Clean Air Act to provide a legally enforceable State Implementation Plan for the attainment and maintenance of the National Ambient Air Quality Standards. This program is administered by the State Air Pollution Control Board (Virginia Code §10.1-1300 through §10.1-1320).

Construction activities have the potential to produce dust and result in minimal short term increases in vehicle emissions in the vicinity of the proposed site as construction workers travel to and from the site and operate construction equipment. However, the production of dust and the increase in vehicle emissions would be minimal due to the size and scope of the construction activities and would be temporary in nature (only during construction). To minimize potential effects, BMPs would be used

during construction, including the employment of appropriate dust suppression methods, the utilization of low sulfur fuels for construction equipment, and the implementation of a construction management plan to minimize interference with motor vehicle traffic.

Under the proposed action, future activities conducted at the courthouse would be similar in scope to activities currently being conducted, and would not result in new sources of long-term emissions. Therefore, the proposed action has no potential to cause long-term impacts to air quality in the City of Alexandria. The proposed action is exempt from the General Conformity Rule (Title 40 C.F.R. § 93.153(c)(2)(x)), resulting in no emissions increase or an increase in emissions that is clearly de minimis.

COASTAL LANDS MANAGEMENT

The coastal lands management program is a state-local cooperative program administered by the DCR's Division of Stormwater Management – Local Implementation (previously the Division of Chesapeake Bay Local Assistance) and 88 localities in Tidewater, Virginia established pursuant to the Chesapeake Bay Preservation Act; Virginia Code §§10.1-2100 through §§10.1-2114 and Chesapeake Bay Preservation Area Designation and Management Regulations; Virginia Administrative Code 9 VAC10-20 et seq.

The Chesapeake Bay Protection and Restoration Executive Order (EO 13508) recognizes the Chesapeake Bay as a national treasure and calls on the federal government to lead a renewed effort to restore and protect the nation's largest estuary and its watershed. As a part of the requirements, federal agencies must strengthen storm water management practices for federal facilities and federal land within the Bay watershed and develop a best practices guide for reducing polluted runoff.

As a federal agency, it is GSA's policy to comply with the intent of the Chesapeake Bay Preservation Act to the greatest extent practicable. In addition, GSA is committed to complying with Executive Order 13508. As indicated above under the discussion of Non-Point Source Pollution Control, the design would reduce impervious surfaces on the site by approximately .13 acres, or 9.4%, and would increase vegetative cover. GSA would further evaluate the use of Low Impact Development (LID) measures in its detailed design for the improvements. In accordance with the City of Alexandria's regulations pertaining to Resource Management Areas, the construction contractor would develop and submit for approval a construction pollution prevention plan prior to the start of construction activities associated with the proposed action. Additionally, required stormwater management BMPs would be implemented and maintained throughout the duration of the project.

CONCLUSION

Based on the above information, data, and analysis, GSA finds that implementation of perimeter security improvements at the A.V. Bryan Courthouse is consistent to the maximum extent possible with the federally approved enforceable policies of the Virginia Coastal Zone Management Program.

Pursuant to 15 C.F.R. § 930.41, the Virginia Coastal Zone Management Program has 60 days from the receipt of this letter in which to concur with or object to this Consistency Determination, or to request an extension, in writing, under 15 C.F.R. § 930.41(b). Virginia's concurrence will be presumed if its response is not received by GSA on the 60th day from receipt of this determination.



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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Douglas W. Domenech
Secretary of Natural Resources

David K. Paylor
Director

(804) 698-4000
1-800-592-5482

January 31, 2012

Ms. Suzanne Hill
Public Buildings Service
U.S. General Services Administration
301 7th Street SW
Washington, DC 20407-0001

RE: Federal Consistency Determination for the Perimeter Security Improvements at the Albert V. Bryan U.S. Courthouse, City of Alexandria, (DEQ 11-207F).

Dear Ms. Hill:

The Commonwealth of Virginia has completed its review of the Federal Consistency Determination (FCD) for the above-referenced project. The Department of Environmental Quality (DEQ) is responsible for coordinating Virginia's review of federal consistency documents and responding to appropriate officials on behalf of the Commonwealth. This letter is in response to your submission received on December 12, 2011 requesting concurrence with the FCD prepared by the General Services Administration (GSA). The following agencies, locality and planning district commission participated in this review:

Department of Environmental Quality
Department of Conservation and Recreation
Department of Historic Resources
Department of Transportation
City of Alexandria
Northern Virginia Regional Commission

In addition, the Department of Game and Inland Fisheries was invited to comment on the proposal.

PROJECT DESCRIPTION

The U.S. General Services Administration (GSA) proposes to implement permanent security measures at the A.V. Bryan Courthouse located at 2100 Jamieson Avenue in the City of Alexandria. The proposed security measures would include hardscape and landscape alterations and the installation of physical security infrastructure. The project area is approximately 1.4 acres, excluding the courthouse, and contains both public rights-of-way and GSA property between the courthouse's existing security perimeter and the courthouse building. Permanent perimeter security elements would be provided along three sides of the building, on Jamieson Avenue, Courthouse Square South, and Elizabeth Lane. Security elements would consist of hardened garden fencing, altered curb lines, expanded planting beds, narrowed roadway widths, and the installation of bollards.

PUBLIC PARTICIPATION

In accordance with 15 CFR § 930.2, public notice of the proposed action was published on DEQ's web site from December 16, 2011 to January 12, 2012. No public comments were received in response to the notice.

FEDERAL CONSISTENCY ANALYSIS

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

According to information in the consistency determination, the proposed activity would have no effect on the following enforceable policies: fisheries management; subaqueous lands management; wetlands management; dunes management; point source pollution control; and shoreline sanitation. The agencies responsible for the administration of the enforceable policies of the VCP generally agree with the GSA's determinations. The GSA must ensure that the proposed action is consistent with the aforementioned policies. The analysis which follows responds to the GSA's discussion of the enforceable policies of the VCP that apply to these activities and review comments submitted by agencies that administer the enforceable policies.

FEDERAL CONSISTENCY CONCURRENCE

Based on our review of the GSA's consistency determination and the comments submitted by agencies administering the enforceable policies of the VCP, DEQ concurs that the proposals are consistent with the VCP provided the proposals comply with all the applicable permits, approvals, and conditions of the enforceable policies of the VCP (see detailed discussions below).

Other state approvals which may apply to these activities are not included in this consistency concurrence. Therefore, the GSA must ensure that these activities are constructed and operated in accordance with all applicable federal, state, and local laws and regulations.

1. Nonpoint Source Pollution Control. According to the FCD (page 8), demolition and construction activities associated with implementation of the perimeter security improvements would disturb approximately 0.6 acre of the existing 1.4-acre site. Construction of the improvements would include expansion of some existing planting areas and installation of new planting areas, which would result in a decrease in impervious surface of approximately 0.13 acre (9.4%). The document states that the proposed improvements would adhere to state criteria for stormwater management and water quality as stipulated in the Virginia Stormwater Management Regulations and Virginia Erosion and Sediment Control Regulations.

1(a) Agency Jurisdiction. DCR's Division of Stormwater Management (DSM) administers the *Virginia Erosion and Sediment Control Law and Regulations (VESCL&R)* and *Virginia Stormwater Management Law and Regulations (VSWML&R)*.

1(b) Erosion and Sediment Control and Stormwater Management Plans. According to DCR-DSM, the GSA and its authorized agents conducting regulated land-disturbing activities on private and public lands in the state must comply with the *VESCL&R*, *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 and federal consistency under the *Coastal Zone Management Act*). Clearing and grading activities, installation of staging areas, parking lots, roads, buildings, utilities, or other structures, soil or dredge spoil areas, or related land conversion activities that disturb 2,500 square feet or more in areas analogous to Chesapeake Bay Preservation Areas (CBPAs), would be regulated by *VESCL&R* and *VSWML&R*. Accordingly, the GSA must prepare and implement erosion and sediment control (ESC) plan to ensure compliance with state law and regulations. The ESC plan is submitted to the DCR Regional Office that serves the area where the project is located for review for compliance. The 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. [Reference: *VESCL* §10.1-567].

1(c) Virginia Stormwater Management Program General Permit for Stormwater Discharges from Construction Activities. DCR is responsible for the issuance, denial, revocation, termination and enforcement of the Virginia Stormwater Management Program (VSMP) General Permit for Stormwater Discharges from Construction Activities related to municipal separate storm sewer systems (MS4s) and construction activities for the control of stormwater discharges from MS4s and land disturbing activities under the Virginia Stormwater Management Program.

The operator or owner of a construction project involving land-disturbing activities equal to or greater than 2,500 square feet in areas analogous to the *Chesapeake Bay Preservation Area Designation and Management Regulations* are required to register for coverage under the General Permit for Discharges of Stormwater from Construction Activities and develop a project specific stormwater pollution prevention plan (SWPPP). The SWPPP must be prepared prior to submission of the registration statement for coverage under the general permit and the SWPPP must address water quality and quantity in accordance with the VSMP Permit Regulations. General information and registration forms for the General Permit are available on DCR's website at http://www.dcr.virginia.gov/stormwater_management/vsmp.shtml. [Reference: *Virginia Stormwater Management Act* §10.1-603.1 *et seq.*; *VSMP Permit Regulations* 4 VAC-50 *et seq.*]

2. Air Pollution Control. According to the FCD (page 10), the proposed construction has the potential to produce dust and result in minimal short-term increases in vehicle emissions in the area due to construction worker travel and the operation of construction equipment. Dust emissions would be controlled through the use of appropriate best management practices (BMPs). There would be no new sources of long-term emissions at the facility.

2(a) Agency Jurisdiction. DEQ's Air Quality Division, on behalf of the State Air Pollution Control Board, is responsible to develop regulations that become *Virginia's Air Pollution Control Law*. DEQ is charged to carry out mandates of the state law and related regulations as well as Virginia's federal obligations under the *Clean Air Act* as amended in 1990. The objective is to protect and enhance public health and quality of life through control and mitigation of air pollution. The division ensures the safety and quality of air in Virginia by monitoring and analyzing air quality data, regulating sources of air pollution, and working with local, state and federal agencies to plan and implement strategies to protect Virginia's air quality. The appropriate regional office is directly responsible for the issue of necessary permits to construct and operate all stationary sources in the region as well as to monitor emissions from these sources for compliance. As a part of this mandate, the environmental documents of new projects to be undertaken in the state are also reviewed. In the case of certain projects, additional evaluation and demonstration must be made under the general conformity provisions of state and federal law.

2(b) Agency Findings. According to the DEQ Air Division, the project site is located in a designated ozone nonattainment area and emission control area for volatile organic

compounds (VOCs) and oxides of nitrogen (NO_x). Precursors to ozone (O₃) pollution include VOCs and NO_x.

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

2(d) Requirements.

(i) Fugitive Dust

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

- Use, where possible, of water or chemicals for dust control;
- Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
- Covering of open equipment for conveying materials; and
- Prompt removal of spilled or tracked dirt or other materials from paved streets and removal of dried sediments resulting from soil erosion.

(ii) Open Burning

If project activities include the open burning, this activity must meet the requirements of 9 VAC 5-130-10 through 9 VAC 5-130-60 and 9 VAC 5-130-100 of the *Regulations* for open burning, and it may require a permit. The *Regulations* provide for, but do not require, the local adoption of a model ordinance concerning open burning. The GSA should contact City of Alexandria officials to determine what local requirements, if any, exist.

3. Coastal Lands Management. According to the FCD (page 11), it is GSA's policy to comply with the intent of the *Chesapeake Bay Preservation Act* to the greatest extent practicable. Impervious surfaces on site will be reduced by approximately 0.13 acre or 9.4%. The document states that, in accordance with Alexandria's regulations pertaining to Resource Management Areas, the construction contractor would develop and submit for approval a pollution prevention plan prior to the start of construction.

3(a) Agency Jurisdiction. DCR's Division of Stormwater Management (DSM), Local Implementation (LI) (previously called the Division of Chesapeake Bay Local Assistance) administers the coastal lands management enforceable policy of the VCP which is governed by the *Chesapeake Bay Preservation Act (Bay Act)* (*Virginia Code* §10.1-2100-10.1-2114) and *Chesapeake Bay Preservation Area Designation and Management Regulations (Regulations)* (9 VAC 10-20 *et seq.*).

3(b) Agency Comments. According to DCR-DSM-LI, in the City of Alexandria, the areas protected by the *Bay 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;
- tidal shores; and
- a 100-foot vegetated buffer area located adjacent to and landward of these features and along both sides of any water body with perennial flow.

All areas of the city not included in the RPA are designated as RMAs.

3(c) Requirements. Federal actions on installations located within Virginia's federally approved coastal zone under the Coastal Zone Management Act are required to be consistent, to the maximum extent practicable, with the performance criteria of the *Regulations* on lands analogous to locally designated Chesapeake Bay Preservation Areas (CBPAs). The following requirements apply to the proposed project based on DCR-DSM-LI's findings.

(i) General Performance Criteria

Development on lands analogous to RMAs are subject to general performance criteria found in 9 VAC 10-20-120 of the *Regulations*, including requirements to:

- minimize land disturbance (including access and staging areas);
- retain indigenous vegetation; and
- minimize post-development impervious surfaces.

For land disturbance of 2,500 square feet or more, the project must comply with:

- the requirements of the *Virginia Erosion & Sediment Control Handbook*, Third Edition, 1992; and
- stormwater management criteria consistent with water quality protection provisions of the *Virginia Stormwater Management Regulations* (4 VAC 50-60-10) shall be satisfied.

(ii) Chesapeake Ecosystem Unified Plan

The 1998 Chesapeake Ecosystem Unified Plan requires the signatories, including the Department of the Army, to fully cooperate with local and state governments in carrying out voluntary and mandatory actions to comply with the management of stormwater. All signatory agencies committed to encouraging construction design that:

- (a) minimizes natural area loss on new and rehabilitated federal facilities;

- (b) adopts low impact development and best management technologies for stormwater, sediment and erosion control, and reduces impervious surfaces; and
- (c) considers the *Conservation Landscaping and BayScapes Guide for Federal Land Managers*.

(iii) Chesapeake 2000 Agreement

The Chesapeake 2000 Agreement committed the signatory agencies to a number of sound land use and stormwater quality controls. The signatories additionally committed the agencies to lead by example with respect to controlling nutrient, sediment and chemical contaminant runoff from government properties. In December 2001, the Executive Council of the Chesapeake Bay Program issued *Directive No. 01-1: Managing Storm Water on State, Federal and District-owned Lands and Facilities*, which includes specific commitments for agencies to lead by example with respect to stormwater control.

3(d) Agency Findings. DCR-DSM-LI finds that, while not impacting RPA lands, the project must adhere to performance criteria related to construction activities on areas analogous to RMA.

3(e) Conclusion. DCR-DSM-LI concludes that the proposed activity is consistent with the coastal lands management enforceable policy of the Virginia Coastal Zone Management Program as administered through the *Bay Act* and *Regulations*, provided construction adheres to the above requirements.

ADDITIONAL ENVIRONMENTAL CONSIDERATIONS

In addition to the enforceable policies of the VCP, comments were also provided with respect to applicable requirements and recommendations of the following programs:

1. Solid and Hazardous Waste Management.

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

1(b) Agency Findings. DEQ's Division of Land Protection and Revitalization (DLPR) (formerly the Waste Division) conducted a geographic information system (GIS) database search and a cursory review of DEQ data files and determined that the A.V. Bryan U.S. Courthouse is listed as a Resource Conservation and Recovery Act (RCRA) hazardous waste facility.

1(c) Recommendations.

(i) RCRA

The following websites may be accessed to locate additional information on the facility:

- <http://www.epa.gov/superfund/sites/cursites/index.htm> or
- http://www.epa.gov/enviro/html/rcris/rcris_query_java.html.

In addition, project coordination under RCRA may be accomplished by contacting the RCRA facility contact, Calvert M. Jones at (703) 548-7953.

(ii) Pollution Prevention

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.

1(d) Requirements.

(i) Waste Disposal

Any soil that is suspected of contamination or wastes that are generated during construction-related activities must be tested and disposed of in accordance with applicable federal, state, and local laws and regulations. All construction and demolition debris must be characterized in accordance with the Virginia Hazardous Waste Management Regulations prior to disposal at an appropriate facility.

(ii) Asbestos-containing Materials and Lead-based Paint

Structures being demolished and 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 for ACM (9 VAC 20-80-640) and for LBP (9 VAC 20-60-261) must be followed.

Questions or requests for further information may be directed to DEQ-DLPR, Steve Coe at (804) 698-4029.

2. 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. Contact the Department of Agriculture and Consumer Services at (804) 786-3501 for more information.

3. Natural Heritage Resources.

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

3(b) Agency Findings.

(i) Natural Heritage Resources

DCR-DNH searched its Biotics Data System for occurrences of natural heritage resources from the project area. Biotics documents the presence of natural heritage resources in the project area. However, due to the scope of the activity and the distance to the resources, DCR-DNH does not anticipate that the project will adversely impact these natural heritage resources.

(ii) Threatened and Endangered Plant and Insect Species

The Endangered Plant and Insect Species Act of 1979, Chapter 39, §3.1-102- through 1030 of the *Code of Virginia*, as amended, authorizes the Virginia Department of Agriculture and Consumer Services (VDACS) to conserve, protect and manage endangered species of plants and insects. The VDACS Virginia Endangered Plant and Insect Species Program personnel cooperates with the U.S. Fish and Wildlife Service, DCR-DNH and other agencies and organizations on the recovery, protection or conservation of listed threatened or endangered species and designated plant and insect species that are rare throughout their worldwide ranges. In those instances where recovery plans, developed by the U.S. Fish and Wildlife Service, are available, adherence to the order and tasks outlines in the plans are followed to the extent possible.

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

(iii) State Natural Area Preserves

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

3(c) Recommendation. Contact DCR-DNH at (804) 786-7951 to secure updated information on natural heritage resources if a significant amount of time passes before the project is implemented since new and updated information is continually added to the Biotics Data System.

4. Transportation Impacts.

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

4(b) Agency Findings. The VDOT Regional Planning and Review Team (NoVa District) finds that the project site lies within the Eisenhower East Small Area Plan. The Plan includes extensive measures such as bus access, Transportation Management Plans (TMPs), Ridesharing Information and Incentives, and close by transit facilities (i.e. the Eisenhower Metro Station) for this area which would compensate for the possible lane closure along Jamieson Avenue due to the construction of the jersey wall barrier.

4(c) Recommendation. VDOT notes that the project lies within the independent City of Alexandria, which has authority over streets, signals and other highway infrastructure within the city. Therefore, VDOT recommends that this project be coordinated with Alexandria's Office of Transportation for review.

For additional information regarding the above comments, contact the VDOT, Randy Hodgson at (703) 259-2753.

5. Historic Structures and Archaeological Resources.

5(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.

5(b) Agency Findings. DHR reviewed the FCD pursuant to Section 106 NHPA, as amended, and its implementing regulation 36 CFR Part 800. DHR finds that no historic properties will be affected by the project.

For additional information, contact DHR, Andrea Kampinen at (804) 482-6084.

6. Local Review.

6(a) Agency Jurisdiction. In accordance with CFR 930, Subpart A, §930.6(b) of the *Federal Consistency Regulations*, DEQ, on behalf of the state, is responsible for securing necessary review and comment from other state agencies, the public, regional government agencies, and local government agencies, in determining the Commonwealth's concurrence or objection to a federal consistency certification.

6(b) Local Comments. The Alexandria Office of the City Manager finds that the information contained GSA's FCD is consistent with discussions the city has had with GSA to date.

6(c) Recommendation. The city offers the following recommendations:

- Appropriate easements must be obtained prior to any construction that will occur on the Carlyle Community Council (CCC) property. Since the city holds a public access easement for much of this area, coordination with the city must occur to update these easements.
- The city recommends the following, related to proposed project impacts on the width of Jamieson Avenue and Courthouse Square South:
 - The lane configuration on Jamieson Avenue shall be consistent with the document the city provided GSA on October 29, 2009, and a minimum of 11 foot travel lanes shall be accommodated.
 - Courthouse Square South will be reopened to traffic, but narrowed to limit travel in one direction (northwest to southeast). A minimum of 18 feet shall be accommodated.
- Bollards shall be located to not disrupt typical pedestrian routes to the extent possible.

Questions regarding the Alexandria's comments may be directed to Rashad Young, City Manager at (703) 746-4300.

7. Regional Review.

7(a) Agency Jurisdiction. In accordance with CFR 930, Subpart A, §930.6(b) of the *Federal Consistency Regulations*, DEQ, on behalf of the state, is responsible for securing necessary review and comment from other state agencies, the public, regional

government agencies, and local government agencies, in determining the Commonwealth's concurrence or objection to a federal consistency certification.

7(b) Agency Comments. The Northern Virginia Regional Commission (NVRC) notes that the City of Alexandria has a jurisdiction-wide RMA which requires all development to result in a no-net-increase standard for phosphorus loadings, based on the city's average imperviousness.

7(c) Recommendation. NVRC recommends that special attention be given to post-construction stormwater quality management. Opportunities for retrofit of existing stormwater quantity facilities to stormwater quality facilities through new construction activities should be explored. NVRC's *Guidebook for Maintaining BMPs in Northern Virginia* may be used by the GSA as a reference.

Further questions on the NVRC comments may be directed to Aimee Vosper at (703) 642-0700.

REGULATORY AND COORDINATION NEEDS

1. Nonpoint Source Pollution Control.

1(a) Erosion and Sediment Control and Stormwater Management. The GSA must ensure that it is in compliance with *Virginia's Erosion and Sediment Control Law* (*Virginia Code* 10.1-567) and *Regulations* (4 VAC 50-30-30 *et seq.*) and *Stormwater Management Law* (*Virginia Code* 10.1-603.5) and *Regulations* (4 VAC 3-20-210 *et seq.*). An erosion and sediment control plan may be submitted to the DCR Warrenton Regional Office at (540) 347-6420 for review and approval.

1(b) Virginia Stormwater Management Program General Permit for Stormwater Discharges from Construction Activities. For projects involving land-disturbing activities equal to or greater than 2,500 square feet in area analogous to Chesapeake Bay Preservation Areas, the GSA is required to apply for registration coverage under the Virginia Stormwater Management Program General Permit for Discharges of Stormwater from Construction Activities. Specific questions regarding the Stormwater Management Program requirements should be directed to DCR, Holly Sepety at (804) 225-2613.

2. Air Pollution Control. This project is subject to air pollution control regulations administered by the Department of Environmental Quality. The following sections of the Code of Virginia and Virginia Administrative Code are applicable:

- 9 VAC 5-50-60 *et seq.* governing fugitive dust emissions; and
- 9 VAC 5-130 *et seq.*, for open burning.

For more information and coordination contact DEQ-NRO, Terry Darton at (703) 583-3845. Also, contact local City of Alexandria officials for information on any local

requirements pertaining to open burning

3. Coastal Lands Management. This project must be consistent to the maximum extent practicable with the coastal lands management enforceable policy of the VCP as administered by DCR-DSM-LI through the *Chesapeake Bay Preservation Area Designation and Management Regulations* (9 VAC 10-20 *et seq.*). Development within lands analogous to a Resource Management Area is subject to the general performance criteria found in the *Regulations* at 9 VAC 10-20-120 *et seq.* The *Regulations* can be accessed online at http://www.dcr.virginia.gov/stormwater_management/theregs.shtml. For additional information and coordination, contact DCR-DSM-LI, Daniel Moore at (804) 786-1518.

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

- *Virginia Waste Management Act* (Code of Virginia Section 10.1-1400 *et seq.*);
- *Virginia Hazardous Waste Management Regulations* (VHWMR) (9 VAC 20-60);
- *Virginia Solid Waste Management Regulations* (VSWMR) (9 VAC 20-81); and
- *Virginia Regulations for the Transportation of Hazardous Materials* (9 VAC 20-110).

Some of the applicable federal laws and regulations are:

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

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

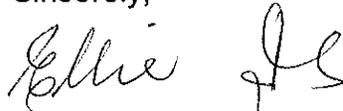
4(a) Asbestos-containing Material. It is the responsibility of the owner or operator of rehabilitation activities, prior to the commencement of the activity, to thoroughly inspect the affected part of the project where the rehabilitation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material (ACM). Upon classification as friable or non-friable, all waste ACM shall be disposed of in accordance with the Virginia Solid Waste Management Regulations (9 VAC 20-80-640), and transported in accordance with the Virginia regulations governing Transportation of Hazardous Materials (9 VAC 20-110-10 *et seq.*). Contact the DEQ-DLPR, Linda Richardson at (804) 698-4318 and the Department of Labor and Industry, Ronald L. Graham (804) 786-0574 for additional information.

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

5. Transportation. Coordination on potential project impacts to local roads and pedestrian travel may be accomplished by contacting Alexandria Transportation and Environmental Services, Transportation Division at (703) 746-4025.

Thank you for the opportunity to comment on the FCD. The detailed comments of reviewing agencies are attached for your review. If you have questions, please call me at (804) 698-4325 or John Fisher at (804) 698-4339.

Sincerely,



Ellie Irons, Program Manager
Environmental Impact Review

Enclosures

Ec: David Hartshorn, DEQ-NRO
Steve Coe, DEQ- DLPR
Kotur Narasimhan, DEQ-Air
Amy Ewing, DGIF
Robbie Rhur, DCR
Roger Kirchen, DHR
Chip Ray, VDOT
G. Mark Gibb, Northern Virginia Regional Commission

Cc: Rashad Young, City of Alexandria

Hartshorn, David (DEQ)

RECEIVED

From: Hartshorn, David (DEQ)
Sent: Tuesday, December 27, 2011 11:21 AM
To: Fisher, John (DEQ)
Cc: Hartshorn, David (DEQ)
Subject: CR #11-207F

DEC 29 2011
DEQ-Office of Environmental
Impact Review

NRO comments regarding the Perimeter Security Improvements at Albert V. Bryan U.S. Courthouse, General Services Administration are as follows:

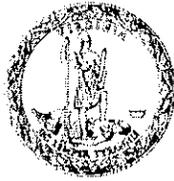
Division of Land Protection and Revitalization: Any solid and/or hazardous waste encountered and/or generated during the construction of this project shall be disposed of following applicable federal, state, and county regulations.

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.

R. David Hartshorn
Regional Air Compliance Manager
DEQ-NRO
13901 Crown Court
Woodbridge, VA 22193
(703) 583-3895
fax (703) 583-3821
e-mail - R.David.Hartshorn@deq.virginia.gov

This electronic mail (including any attachments) may contain information that is privileged, confidential, and/or otherwise protected from disclosure to anyone other than its intended recipient(s). Any dissemination or use of this electronic email or its contents (including any attachments) by persons other than the intended recipient(s) is strictly prohibited.

Douglas W. Domenech
Secretary of Natural Resources



David A. Johnson
Director

COMMONWEALTH of VIRGINIA
DEPARTMENT OF CONSERVATION AND RECREATION

203 Governor Street
Richmond, Virginia 23219-2010
(804) 786-1712

RECEIVED
JAN 10 2012
DEQ-Office of Environmental
Impact Review

MEMORANDUM

DATE: January 10, 2012
TO: John Fisher, DEQ
FROM: Roberta Rhur, Environmental Impact Review Coordinator
SUBJECT: DEQ 11-207F, Security Improvements, Bryan Courthouse, Alexandria

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 in 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 Virginia Department of Conservation and Recreation (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 contact DCR for an update on this natural heritage information if a significant amount of time passes before it is utilized.

The Virginia Department of Game and Inland Fisheries 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 Shirl Dressler at (804) 367-6913.

Division of Stormwater Management

Chesapeake Bay Local Assistance:

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

Pursuant to the *Coastal Zone Management Act of 1972*, as amended, federal activities affecting Virginia's coastal resources or coastal uses must be consistent with Virginia's Coastal Zone Management Program (CZM Program) (see § 307(c)(1) of the Coastal Zone Management Act and 15 CFR Part 930, sub-part C of the *Federal Consistency Regulations*).

While Chesapeake Bay Preservation Areas (CBPA) are not locally designated on federal lands, this does not relieve federal agencies of their responsibility to be consistent with the provisions of the Regulations, § 9 VAC 10-20-10 et seq., as one of the enforceable programs of the CZM Program. 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 CBPAs. Projects that include land disturbing activity must adhere to the performance criteria, especially with respect to minimizing land disturbance (including access and staging areas), retaining indigenous vegetation and minimizing impervious cover. For land disturbance over 2,500 square feet, the project must also comply with the requirements of the *Virginia Erosion and Sediment Control Handbook*, Third Edition, 1992. Additionally, stormwater management criteria consistent with water quality protection provisions of the *Virginia Stormwater Management Regulations*, § 4 VAC 50-60-10, shall be satisfied.

The 1998 *Federal Agencies' Chesapeake Ecosystem Unified Plan* (Plan) calls for the signatories of that Plan to cooperate with local and state governments in carrying out actions to comply with stormwater management regulations. The Plan further encourages low impact development practices that minimize the loss of natural areas and reduce impervious surfaces on federal facilities, as well as other best management practices to address stormwater management, and sediment and erosion control. In addition, the *Chesapeake 2000* agreement committed the government agencies to sound land use and stormwater quality controls. The signatories additionally committed the agencies to lead by example with respect to controlling nutrient, sediment and chemical contaminant runoff from government properties. In December 2001, the Executive Council of the Chesapeake Bay Program issued *Directive No. 01-1: Managing Storm Water on State, Federal and District-owned Lands and Facilities*, which includes specific commitments for agencies to lead by example with respect to stormwater control.

All proposed land disturbance, clearing, or grading related to activity proposed in any Consistency Determination must comply with the *Chesapeake Bay Preservation Area Designation and Management Regulations* as enforced through locally adopted Chesapeake Bay Preservation Area (CBPA) ordinances.

As described, the project would be located on lands analogous to the locally designated RMA. The proposed security improvements must be constructed in accordance with (i) regulations promulgated pursuant to the *Erosion and Sediment Control Law*, § 10.1-603 et seq. of the Code of Virginia, and the *Stormwater Management Act*, § 10.1-603.1 et seq. of the Code of Virginia, (ii) an erosion and sediment control plan and a stormwater management plan approved by the Virginia Department of Conservation and Recreation, or (iii) local water quality protection criteria at least as stringent as the above state requirements.

Provided adherence to the above requirements, the proposed activity would be consistent with the *Chesapeake Bay Preservation Act* and Regulations.

Stormwater Management:

The applicant and their authorized agents conducting regulated land disturbing activities on private and public lands in the state must comply with the Virginia Erosion and Sediment Control Law and Regulations (VESCL&R), Virginia Stormwater Management Law and Regulations 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-disturbance activities that result in the land-disturbance of greater than 2,500 square feet would be regulated by VESCL&R. Accordingly, the applicant must prepare and implement erosion and sediment control (ESC) plan to ensure compliance with state law and regulations. The ESC plan is submitted to the DCR Regional Office that serves the area where the project is located for review for compliance. The applicant is ultimately responsible for achieving project compliance through oversight of on site contractors, regular field inspection, prompt action against non-compliant sites, and other mechanisms consistent with agency policy. [Reference: VESCL §10.1-567;].

General Permit for Discharges of Stormwater from Construction Activities in CBPA:

The operator or owner of construction activities involving land disturbing activities equal to or greater than 2,500 square feet in areas designated as subject to the Chesapeake Bay Preservation Area Designation and Management Regulations adopted pursuant to the Chesapeake Bay Preservation Act are required to register for coverage under the General Permit for Discharges of Stormwater from Construction Activities and develop a project specific stormwater pollution prevention plan (SWPPP). The SWPPP must be prepared prior to submission of the registration statement for coverage under the general permit and the SWPPP must address water quality and quantity in accordance with the Virginia Stormwater Management Program (VSMP) Permit Regulations. General information and registration forms for the General Permit are available on DCR's website at http://www.dcr.virginia.gov/soil_and_water/index.shtml

[Reference: Virginia Stormwater Management Law Act §10.1-603.1 et seq.; VSMP Permit Regulations §4VAC-50 et seq.]

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

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DEC 22 2011

DEQ-Office of Environmental Impact Review

DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF AIR PROGRAM COORDINATION

ENVIRONMENTAL REVIEW COMMENTS APPLICABLE TO AIR QUALITY

TO: John E. Fisher

DEQ - OEIA PROJECT NUMBER: 11 - 207F

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

X CONSISTENCY DETERMINATION

PROJECT TITLE: PERIMETER SECURITY IMPROVEMENTS AT ALBERT V. BRYAN
U. S. COURTHOUSE

PROJECT SPONSOR: GENERAL SERVICES ADMINISTRATION

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

REGULATORY REQUIREMENTS MAY BE APPLICABLE TO: CONSTRUCTION
 OPERATION

STATE AIR POLLUTION CONTROL BOARD REGULATIONS THAT MAY APPLY:

1. 9 VAC 5-40-5200 C & 9 VAC 5-40-5220 E – STAGE I
2. 9 VAC 5-40-5200 C & 9 VAC 5-40-5220 F – STAGE II Vapor Recovery
3. 9 VAC 5-40-5490 et seq. – Asphalt Paving operations
4. **X 9 VAC 5-130 et seq. – Open Burning**
5. **X 9 VAC 5-50-60 et seq. Fugitive Dust Emissions**
6. 9 VAC 5-50-130 et seq. - Odorous Emissions; Applicable to _____
7. 9 VAC 5-50-160 et seq. – Standards of Performance for Toxic Pollutants
8. 9 VAC 5-50-400 Subpart _____, Standards of Performance for New Stationary Sources, designates standards of performance for the _____
9. 9 VAC 5-80-10 et seq. of the regulations – Permits for Stationary Sources
10. 9 VAC 5-80-1700 et seq. Of the regulations – Major or Modified Sources located in PSD areas. This rule may be applicable to the _____
11. 9 VAC 5-80-2000 et seq. of the regulations – New and modified sources located in non-attainment areas
12. 9 VAC 5-80-800 et seq. Of the regulations – Operating Permits and exemptions. 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).



(Kotur S. Narasimhan)
Office of Air Data Analysis

DATE: December 22, 2011



RECEIVED
JAN 10 2012
DEQ-Office of Environmental
Impact Review

MEMORANDUM

TO: John Fisher, Environmental Program Planner

FROM: *G. Stephen "Steve" Coe*
Steve Coe, Division of Land Protection & Revitalization Review Coordinator

DATE: January 10, 2012

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

SUBJECT: Environmental Impact Report: 11- 207F

The Division of Land Protection & Revitalization has completed its review of the Environmental Impact report for the Perimeter Security Improvements project for the Albert V. Bryan U.S. Courthouse in Alexandria, Virginia 22314. We have the following comments concerning the waste issues associated with this project:

Neither solid and nor hazardous waste issues were generally addressed in the report. The report did not include a search of waste-related data bases. A GIS database search did not reveal any waste sites within 0.1 mile radius that would impact or be impacted by the subject site. The Division of Land Protection & Revitalization staff performed a cursory review of its data files and determined that there is no CERCLIS, VRP, Solid Waste sites and only one hazardous waste site located within 0.1 mile of the project site.

Cerclis – none

VRP – none

Solid Waste - none

RCRA/HW – one

A.V. BRYAN U.S. COURTHOUSE HANDLER ID: VAR000518506

401 COURTHOUSE SQUARE

ALEXANDRIA

VA

COUNTY: ALEXANDRIA CITY

223145798

Contact Information							
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CALVERT M JONES	2121 EISEHHOWER AVE.	ALEXANDRIA	VA	22314	7035487953	Public
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The following websites may prove helpful in locating additional information:
<http://www.epa.gov/superfund/sites/cursites/index.htm> or
http://www.epa.gov/enviro/html/rcris/rcris_query_java.html.

GENERAL COMMENTS:

Any soil that is suspected of contamination or wastes that are generated during construction-related activities 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 20-80); 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.

Also, 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 20-80-640 for ACM and 9VAC 20-60-261 for LBP must be followed. Questions on these topics may be directed to Willard Keene at (276) 676-4847.

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 Steve Coe at (804) 698-4029.

Fisher, John (DEQ)

From: Ray, Alfred C. (VDOT)
Sent: Monday, January 09, 2012 10:49 AM
To: Fisher, John (DEQ)
Cc: Cromwell, James R. (VDOT)
Subject: Albert V. Bryan U.S. Courthouse: 11-207F

John,

Please see the comments below.

A.C. (Chip) Ray
Environmental Program Planner
Virginia Department of Transportation
1401 East Broad Street
Richmond, VA 23219
804/371-2605 (office)
804/814-0603 (cell)
alfred.ray@vdot.virginia.gov

From: Hodgson, Fred R [<mailto:Randy.Hodgson@VDOT.Virginia.gov>]
Sent: Wednesday, January 04, 2012 2:56 PM
To: Ray, Alfred C. (VDOT)
Cc: Trivedi, Rahul, P.E. (VDOT); Srikanth, Kanathur N. (VDOT)
Subject: Federal Consistency Determination

Chip: The Regional Planning and Review Team(NoVa District) has reviewed the following project for impacts to existing and proposed transportation facilities and offers the following comments:

Perimeter Security Improvements at Albert V. Bryan U.S. Courthouse

- The proposed project lies within the Eisenhower East Small Area Plan. The Plan includes extensive measures such as bus access, Transportation Management Plans(TMPs), Ridesharing Information and Incentives, and close by transit facilities (i.e. the Eisenhower Metro Station) for this area which would seem to compensate for the possible lane closure along Jamieson Avenue due to the construction of the jersey wall barrier.
- The project lies within the Independent City of Alexandria which has control over their streets, signals and other highway infrastructure. Therefore, this project should be referred to the City's Office of Transportation for their review.

If you should have any other questions, please feel free to contact me. Thank you.

Randy Hodgson AICP® | Regional Transportation Planner |

Virginia Department of Transportation | 4075 Alliance Drive, Fairfax, VA 22030 |



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JAN 10 2012

DEQ-Office of Environmental Impact Review

COMMONWEALTH of VIRGINIA

Department of Historic Resources

Douglas W. Domenech
Secretary of Natural Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Kathleen S. Kilpatrick
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
TDD: (804) 367-2386
www.dhr.virginia.gov

January 9, 2012

Mr. Gary Porter, Historic Preservation Specialist
U.S. General Services Administration, Public Buildings Service
301 7th Street, SW, Room 2002
Washington, D.C. 20407

Re: Perimeter Security Improvements at Albert V. Bryan U.S. Courthouse
2100 Jamieson Avenue, Alexandria, Virginia
DHR File No. 2011-1805/DEQ#11-207F

Dear Mr. Porter,

On December 12, 2011, the Virginia Department of Historic Resources (DHR) received information regarding the above referenced project for our review and comment pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. DHR understands that the General Services Administration (GSA) intends to prepare an Environmental Assessment (EA) and an Environmental Impacts Report (EIR) for the proposed perimeter security improvements at the Albert V. Bryan U.S. Courthouse in Alexandria, Virginia. The project will update the required level of security at the site, while enhancing the landscaping of the site and the removal temporary security features. Specific project components include the installation of a hardened garden fence between the building and the sidewalk; moving the existing curb-line to the west; opening Courthouse Square South to vehicular traffic once again; and bollard and ornamental fence installation.

Based upon a review of the information provided, DHR recommends that No Historic Properties will be affected by the proposed project. Should you have any additional questions, please feel free contact me at (804) 482-6084, or via email at andrea.kampinen@dhr.virginia.gov.

Sincerely,

Andrea Kampinen
Architectural Historian, Office of Review and Compliance

Cc: Catherine Miliaras, City of Alexandria
Garrett Fesler, Alexandria Archaeology
John Fisher, DEQ

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Impact Review



OFFICE OF THE CITY MANAGER

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Alexandria, Virginia 22314-3211

RASHAD M. YOUNG
City Manager

703.746.4300
Fax: 703.838.6343

January 11, 2012

Mr. John E. Fisher
Department of Environmental Quality
Office of Environmental Impact Review
629 East Main Street, Sixth Floor
Richmond, VA 23219

RE: Perimeter Security Improvements at Albert V. Bryan Courthouse
Environmental Review Request Form

Dear Mr. Fisher:

Thank you for the opportunity to provide feedback on the plan for security improvements at the AV Bryan Courthouse in Alexandria. City Staff and GSA have been working closely on this project to ensure it meets the needs of the U.S. Marshals Service, while maintaining a high quality, pedestrian environment that the Carlyle neighborhood is known for. The provided materials for our review are consistent with the discussions we have had thus far with GSA. However, we ask that the following comments be taken under consideration.

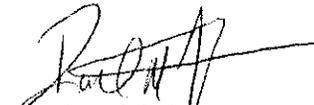
1. Appropriate easements must be obtained prior to any construction that will occur on the Carlyle Community Council (CCC) property. Since the City holds a public access easement for much of this area, coordination with the City must also occur to update these easements.
2. The proposed improvements will have an impact on the width of Jamieson Avenue and Courthouse Square South.
 - a. With regard to Jamieson Avenue, the lane configuration shall be consistent with the document the City provided GSA on October 29, 2009, and a minimum of 11 foot travel lanes shall be accommodated.
 - b. With regard to Courthouse Square South, the street shall be reopened to traffic, but narrowed to limit travel in one direction (northwest to southeast). A minimum of 18 feet shall be accommodated.

Mr. John E. Fisher
Department of Environmental Quality
January 11, 2012
Page 2

3. To the extent possible, the bollards shall be located so as not to disrupt typical pedestrian routes.

We look forward to working with your team to complete the planning for these improvements and proceed with the implementation phase.

Sincerely,



Rashad M. Young
City Manager

cc: Mark Jinks, Deputy City Manager
Faroll Hamer, Planning Director, Planning and Zoning
Rich Baier, Director, Transportation and Environmental Service



Northern Virginia Regional Commission

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December 29, 2011

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Department of Environmental Quality
Office of Environmental Impact Review
629 East Main Street, Sixth Floor
Richmond, VA 23219

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Re: 11-207F; Perimeter Security Improvements at Albert V. Bryan U.S. Courthouse

Dear Mr. Fisher:

The Northern Virginia Regional Commission staff has reviewed the document described above and has the following comments.

Please be advised that the counties of Arlington, Fairfax, and Prince William, the City of Alexandria, and the Town of Herndon, have all enacted jurisdiction-wide Chesapeake Bay Resource Management Area (RMA) designation. This RMA designation requires that all development result in a no-net-increase standard for phosphorus loadings, based on the jurisdiction's average imperviousness.

Special attention should be given to post-construction stormwater quality management. The developing agency must adhere to the post-development water quality requirements set forth by the Virginia Stormwater Management Regulations (VR 215-02-00 Part IV and §2.3). Meeting the Virginia Stormwater Management Regulations should comply with the requirement that state agencies meet the local ordinances pursuant to the Virginia Chesapeake Bay Act.

Please refer to the *Northern Virginia BMP Handbook* for calculation procedures. A copy of the Handbook is available on NVRC's website, www.novaregion.org.

We would also suggest that, where possible, opportunities for retrofit of existing stormwater quantity facilities to stormwater quality facilities through new construction activities should be explored. NVRC's *Guidebook for Maintaining BMPs in Northern Virginia* is available, without charge, should you need it, and can also be downloaded from our website, or call me if you would like to receive a copy to use as a reference.

A photocopy of this letter should be included with your submission to indicate that the review by this agency has been completed.

Your cooperation in the intergovernmental review process is appreciated.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Aimee Vosper".

Aimee Vosper

Director, Environmental and Planning Services

(as of July 1, 2011)



GSA National Capital Region

FEB 16 2012

Ms. Ellie Irons
Program Manager, Office of Environmental Impact Review
VA Department of Environmental Quality
P.O. Box 1105
Richmond, VA 23218

Re: Response to Comments on the Federal Consistency Determination for the Perimeter Security Improvements at the Albert V. Bryan U.S. Courthouse (DEQ 11-207F).

Dear Ms. Irons:

This letter responds to comments received from you dated, January 31, 2012 regarding the completed review of the Federal Consistency Determination for the Albert V. Bryan U.S. Courthouse (A.V. Bryan Courthouse) Perimeter Security Improvements Project. According to the comment letter, Department of Environmental Quality (DEQ) Division of Land Protection and Revitalization conducted a geographic information system database search and a cursory review of DEQ data files and determined that the A.V. Bryan Courthouse is listed as a Resource Conservation and Recovery Act (RCRA) hazardous waste facility.

As recommended in the comment letter, GSA has coordinated with the listed facility contact, GSA's Program Specialist for Industrial Hygiene, and the Property Manager at the A.V. Bryan Courthouse and identified that there are currently no known RCRA generators of hazardous waste at the site, nor are there any on-going processes that generate hazardous waste at the facility. GSA also reached out directly to the DEQ Division of Land Protection and Revitalization and with their assistance determined that the RCRA Information System ID VAR000518506 was listed in 2009 for the disposal of one drum of paint waste. Since the RCRA listing appears to no longer be necessary, GSA will be taking the necessary steps to de-activate it. As required by DEQ, GSA will test and dispose of any soil suspected of contamination in accordance with federal, state, and local laws and regulations.

If you have further questions, please contact Ms. Angela Mar at (202) 205-4668, or Ms. Stephanie Dyer-Carroll at (703) 739-6906. Ms. Dyer-Carroll represents our environmental consultant AECOM. We appreciate your assistance with this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Suzanne Hill".

Suzanne Hill
NEPA Program Lead
Public Buildings Service

Cc: Kelly Holland, GSA Program Specialist for Industrial Hygiene
Zoey Kazimi, GSA Property Manager

U.S. General Services Administration
301 7th Street, SW
Washington, DC 20407-0001
www.gsa.gov

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APPENDIX D: SOURCES

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References

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APPENDIX E: PREPARERS

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