



Executive Director's Recommendation

Commission Meeting: October 4, 2012

PROJECT New Commissary Fort Belvoir, North Post Fairfax County, Virginia	NCPC FILE NUMBER 7150
SUBMITTED BY United States Department of Defense Department of the Army	NCPC MAP FILE NUMBER 2204.00(38.00)43608
REVIEW AUTHORITY Advisory per 40 U.S.C. § 8722(b)(1)	APPLICANT'S REQUEST Preliminary approval of site and building plans
	PROPOSED ACTION Approve building with comments Defer approval of site
	ACTION ITEM TYPE Staff Presentation

PROJECT SUMMARY

The Department of the Army proposes to construct a new 137,000 square foot Commissary at Fort Belvoir on the site of the existing Post Exchange, which will be demolished at the completion of the new Post Exchange currently under construction. The Post Exchange and Commissary are part of a planned North Post Town Center development. The new Commissary will be supported by a total of 588 new parking spaces, including 522 for customers and 66 for employees. The project will also include a 3,000 square foot canopy along the front of the new Commissary building to shelter the entrance and exit areas, a loading area in the rear, and extensive landscaping/seating in the front to create an attractive pedestrian area linking the Post Exchange, Commissary and the rest of the Town Center development.

KEY INFORMATION

- The proposed Commissary will be located adjacent to the new Post Exchange (PX) and share a customer parking lot with the PX.
 - The Commission disapproved preliminary and final site and building plans for the PX due to concerns regarding tree loss. The PX is currently under construction.
 - The Army has worked with NCPC staff to improve the design of the North Post Town Center, which will be included in an updated Master Plan for Fort Belvoir, currently under development. The proposed Commissary is consistent with the existing Master Plan.
 - The proposed Commissary will require the removal of an additional 3.3 acres of trees.
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RECOMMENDATION

The Commission:

Approves the preliminary building plans for the new Commissary on the North Post of Fort Belvoir;

Defers action on the preliminary site development plans due to inadequate information on the applicant's reforestation plan, as well as proposed parking and stormwater management;

Requests that prior to submitting for preliminary and final approval of site development plans for the Commissary, the applicant include the following:

- Information on the tree reforestation plan being developed for the Master Plan update
- Documentation on the project's compliance with stormwater management standards from Fairfax County; Commonwealth of Virginia; EISA, Section 438; and Chesapeake Bay Protection and Restoration Act using quantitative information in the final project submission
- A detailed forecast of projected customer demand for the shared parking lot, including forecast assumptions, parking standards, customer demand overlap, and detailed quantitative demand information

Recommends the elimination of a separate employee parking lot;

Notes that the Applicant has worked with NCPC staff on the development of a North Post Town Center Small Area Plan in response to previous Commission comments, but that the final North Post Town Center Plan will not be available until a draft Master Plan is submitted in early 2013.

PROJECT REVIEW TIMELINE

Previous actions	None.
Remaining actions (anticipated)	December, 2012 - Approval of final building plans and preliminary/ final site development plans.

Prepared by Michael Weil
September 27, 2012

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I. PROJECT DESCRIPTION

Site

The project site is located on Fort Belvoir, North Post, approximately 12 miles south of Washington, D.C., in Fairfax County, Virginia. The site is currently developed with a Post Exchange (PX) building (Figure 1), situated within a relatively large land parcel bordered by Kingman Road on the north; Gunston Road on the west;



Figure 1: Existing Project Site

Gorgas Road on the south; and Woodlawn Road on the east. The new Commissary building will be constructed on the current site of the PX building as shown in Figure 2. The new buildings are part of a Small Area Plan for a North Post Town Center, as shown in Figure 3.



Figure 2: Future Commissary Project Site



Figure 3: North Post Town Center Framework Development Plan

Background

There are no previous Commission actions related to the new Commissary building; however, the project design is directly related to the PX shopping center development, which was reviewed by the Commission three times in 2010 and 2011. The PX is currently under construction. The Commission reviewed the concept design for the PX center development in July, 2010, and issued the comments shown in Appendix A. In response, the Applicant modified the design to reduce customer parking by 100 spaces; provide permeable pavement in 68% of the parking space areas; provide secure employee/customer bicycle racks; provide additional landscaping in the parking lot; and to add energy-efficient Light-Emitting Diode (LED) lighting to the parking lot. The project's siting remained unchanged however, requiring the removal of approximately 25 acres of trees. As such, the Commission remained concerned about the project's impacts to the natural environment and disapproved the project's preliminary design in April, 2011 (Appendix B), requesting additional information on the project's tree removal mitigation. In response, the Army provided additional information to the Commission through a written response (Appendix C) to help address Commission concerns. The Commission remained unsatisfied with the project as proposed, and disapproved the final design at its May, 2011 meeting (Appendix D). Yet, the Applicant proceeded with project construction to meet the demand for a new PX center at Fort Belvoir in light of the Commission's "advisory" authority.¹ The new PX center is scheduled for completion in the Fall, 2013.

¹ NCPC has advisory authority over projects located outside of the District of Columbia, in the Environs, per the National Capital Planning Act.

Once complete, the existing PX building will be demolished and the new Commissary building will be constructed in its place. The building tenant (Defense Commissary Agency) has based the project's design on the design of the PX center (using a single-level building design and surface parking) to minimize cost and to provide a standard appearance for the planned North Post Town Center.² In preparation for Commission review of this project, the Army provided the Commission with an informational presentation on the planned North Post Town Center at its July 12, 2012 meeting.

Proposal

The new Commissary will serve as the "flagship" store for the Defense Commissary Agency (DeCA), replacing the existing Commissary, which is currently the highest grossing store in the DeCA inventory. The project will construct a new 137,000 square foot building located on a 15-acre site along the southside of the new PX shopping center (Figure 3).³ Most of the building's interior space will be located on a ground level, with a small amount of employee-only, administrative space (7,500 square feet) situated on a mezzanine-level, along the front (westside) of the building (Figure 4). The building will have two entrance and two exit locations along the westside.

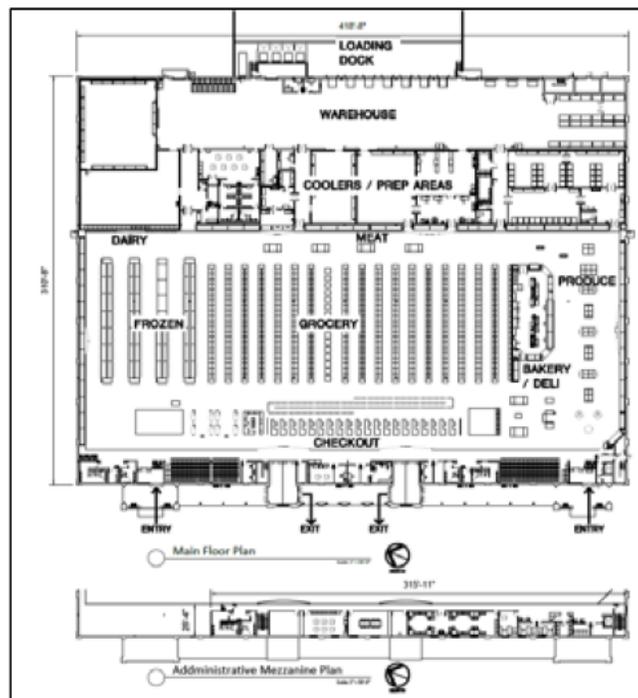


Figure 4: Commissary Floorplan

² NCPC has advisory authority over projects located outside of the District of Columbia, in the Environs, per the National Capital Planning Act.

³ The existing Commissary has an area of 130,688 square feet (including a mezzanine).

The building will have a 3,000 square foot canopy to provide shelter for customers along its front-side entrance/exit areas, as shown in the following elevations (Figure 5).

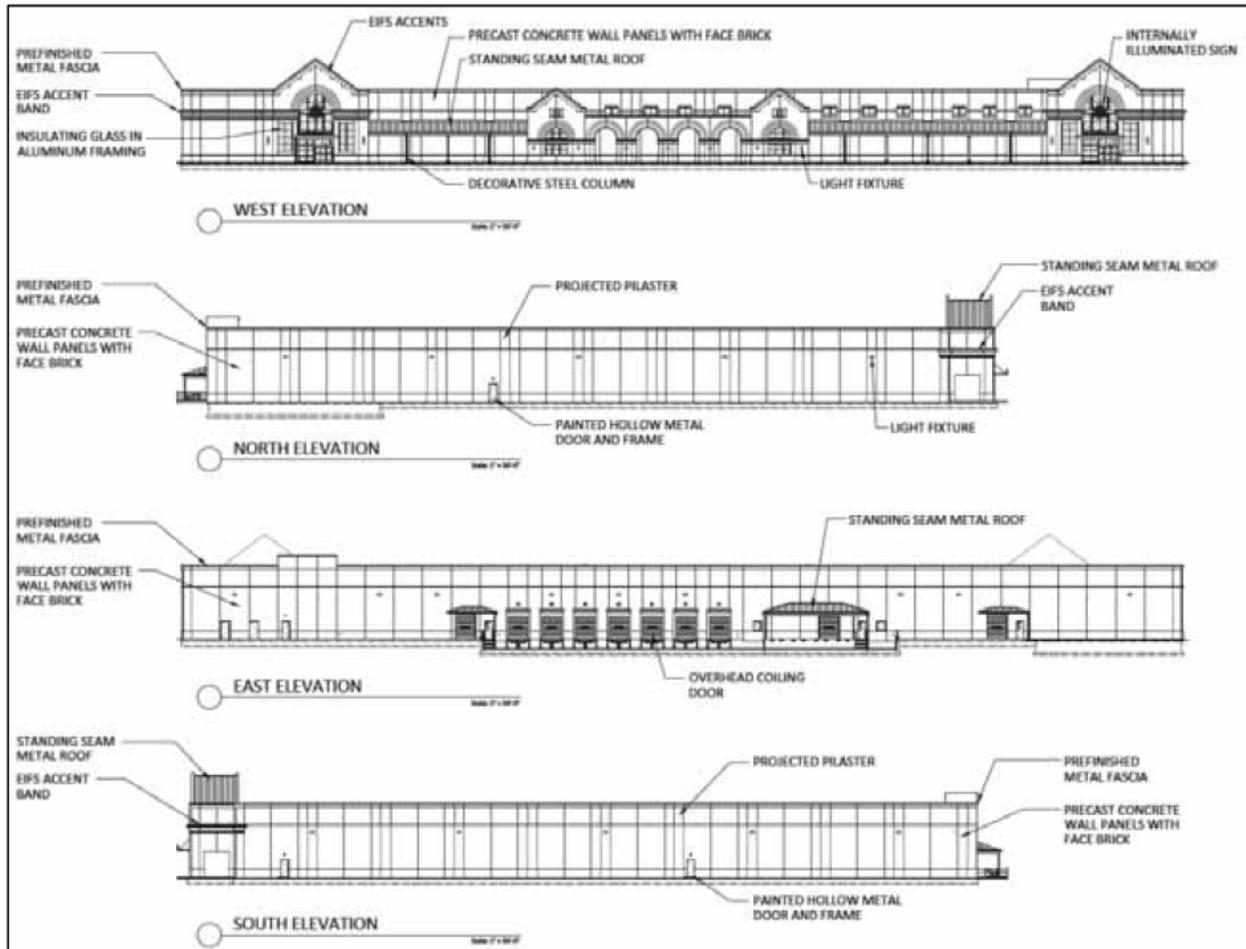


Figure 5: Commissary Building Elevations

The new Commissary is designed with the red-brick style that is reminiscent of the Fort Belvoir Historic District, which is consistent with the PX center design and existing installation design guideline standards (Figure 6). The building interior will consist of an open structure ceiling with skylights, polished concrete floors, gypsum wallboard walls, and decorative trim. The Commissary will be designed to attain Leadership in Energy and Environmental Design (LEED) Silver certification (with a light-colored “cool” roof)⁴, and the final design will meet a number of federal energy efficiency standards including, Executive Order 13423, Executive Order 13514, and EPACK 2005, which set future reduction targets.

⁴ This project was registered with the Green Building Certification Institute (GBCI) on 20 MAR 2012. The GBCI Project Identification Number is 1000023251.



Figure 6: Commissary Building Perspectives

The project will include an attractively-landscaped forecourt area in the front of the Commissary, situated between the building face and the customer lot, with seating, light fixtures, planting/landscape areas, pavers, and a sheltered bus transit stop area. The “park-like” area is intended to buffer the Commissary from the customer parking lot, and to serve as part of a north-south, pedestrian linkage between the PX center (to the north) and the other future North Post Town Center development (to the south). The following site plan (Figure 7) shows a close-up of the forecourt area (outlined in blue), and Figure 8 shows an elevated view perspective, looking from the southwest. Note that the future Commissary building is situated on the right; the future PX center is situated on the left; and the planned sheltered transit stop (with the gazebo) is situated on the left, in front of the PX center in the perspective.

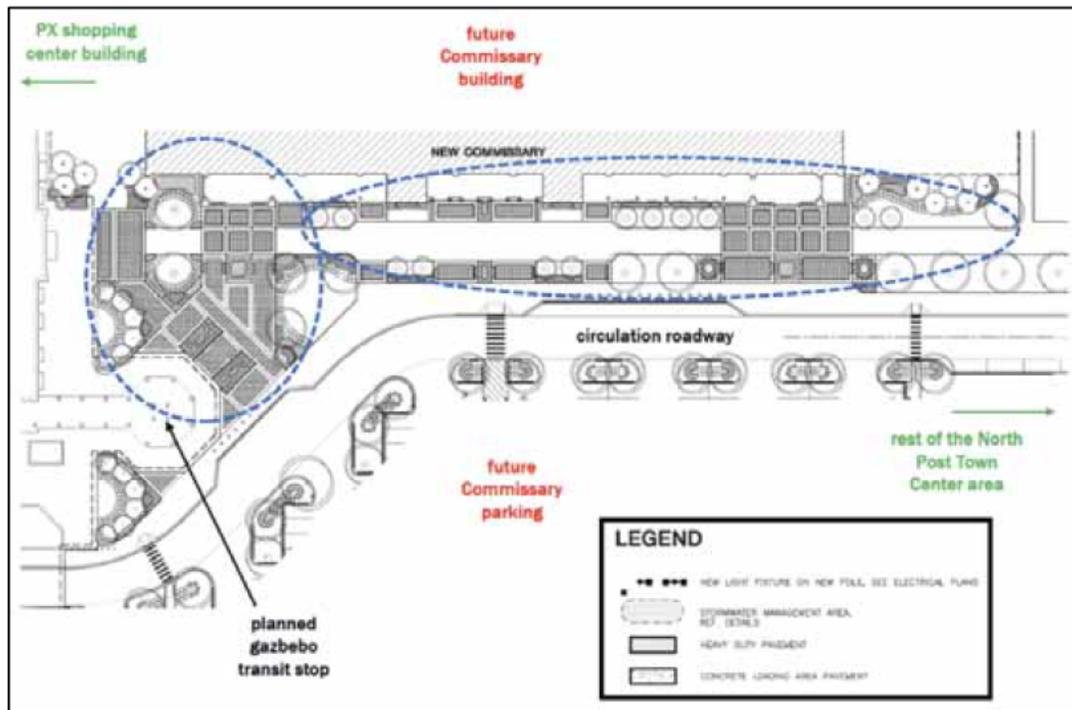


Figure 7: Front Commissary Forecourt Area Plan



Figure 8: Front Commissary Forecourt Area Rendering

The new Commissary will employ 60 full-time staff and 53 part-time employees during a typical shift (113 total employees), resulting in no net change in installation employment. The current site plan shows 522 spaces (506 regular and 16 handicapped-accessible) in a customer lot (to the west of the building) and 66 employee spaces (62 regular and 4 handicapped-accessible) in a separate lot to the south of the building (Figure 9).⁵ The Commissary customer lot will be constructed as an extension from the PX center lot with a consistent geometric and landscape design, and similar low-impact development features, lighting, and pervious pavement in the parking “stall” areas. The single customer lot will operate as a shared lot between the PX center and Commissary uses, rather than two separate lots. The site plan shows approximately 130,000 square feet of area located along the southside of the new building as reserved for future potential Commissary expansion.

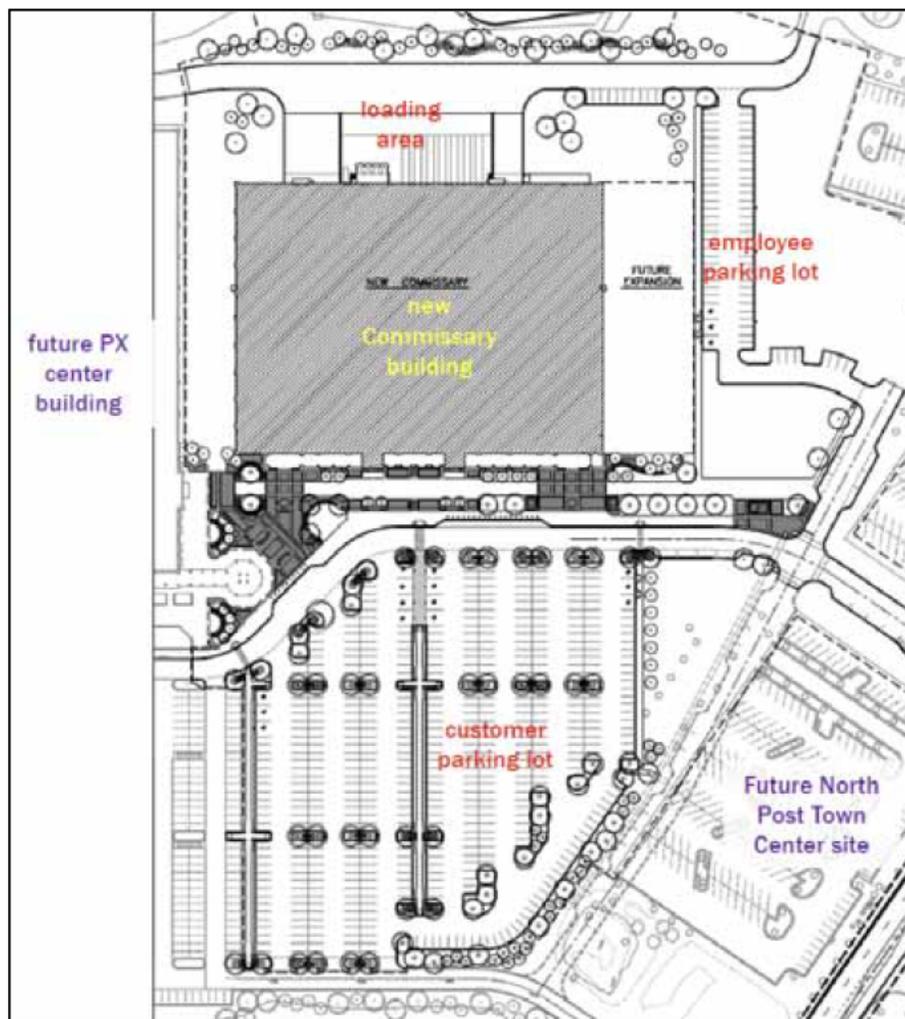


Figure 9: Commissary Site Plan

⁵ The current Commissary has a parking lot with 668 total customer spaces.

The new Commissary will provide commercial loading along the eastside, rear of the building, with 10 vehicle bays. Service access will be provided using Kingman Road and a rear service road along the eastside of the PX center and new Commissary, as shown by the orange arrows in Figure 10.

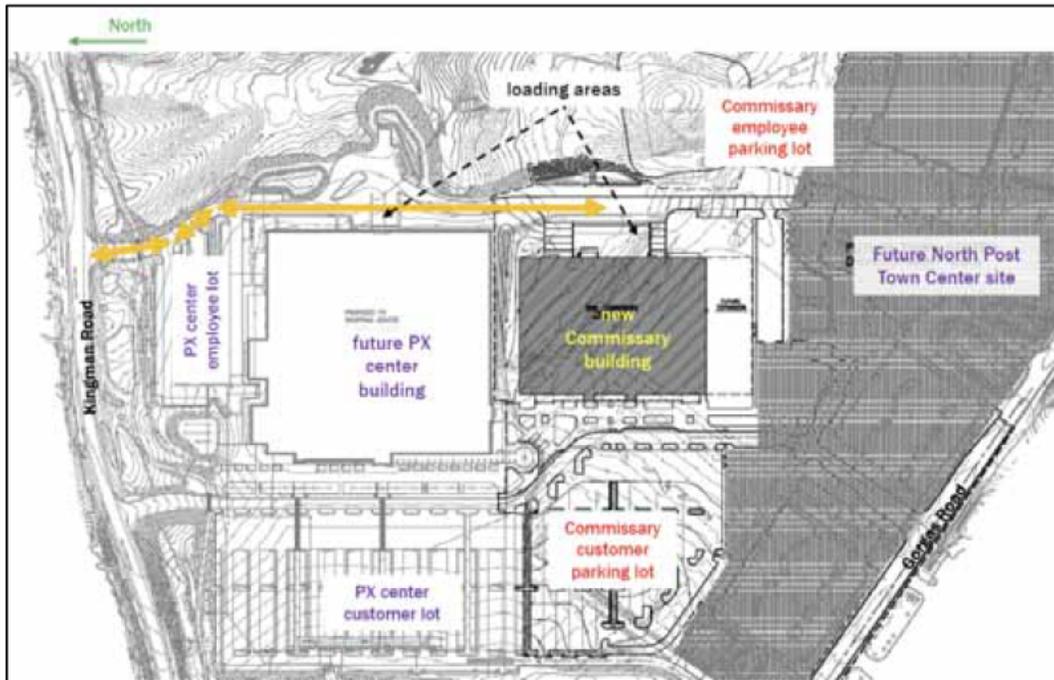


Figure 10: PX Center and Commissary Service Access

The new PX Center and Commissary will serve two different customer populations – a larger, more “regional” population (forecasted to provide 79% of demand) - will access the new Commissary primarily from Kingman Road (from the north), and a smaller, more local customer population (21%) from Gorgas Road, similar to existing “approach” patterns (Figure 11).



Figure 11: Future Customer Paths of Approach

The “regional” population will travel from off-Post (active military personnel and military retirees), from throughout northern Virginia. The more local customer population (primarily active military personnel) will travel from nearby locations from within the installation, most of which, is situated to the south of the site. As such, the parking lot and site access are designed to accommodate both customer populations to the minimum extent possible. The Army has planned the new PX Center and Commissary developments as part of the future North Post Town Center however, to encourage more customer access by local military personnel via biking, walking, and transit in the future.

As part of the new development, there will be several traffic/transportation improvements (Figure 12) to the local roadway network in order to accommodate future vehicular traffic related to the new PX center and Commissary as follows: new dedicated turn lanes along Gorgas Road; a new signalized intersection along Gorgas Road (Gorgas Road and new development access road); new dedicated turn lanes along Kingman Road; and a new signalized intersection along Kingman Road (Kingman Road and new development access road).



Figure 12: Future Planned Local Roadway Improvements

Although most of the Commissary site is currently developed with the existing PX store (to be relocated), customer/employee parking, and commercial vehicle loading, the Commissary project will require clearing approximately an additional 3.3 acres of trees (yellow shading) as shown in Figure 13.

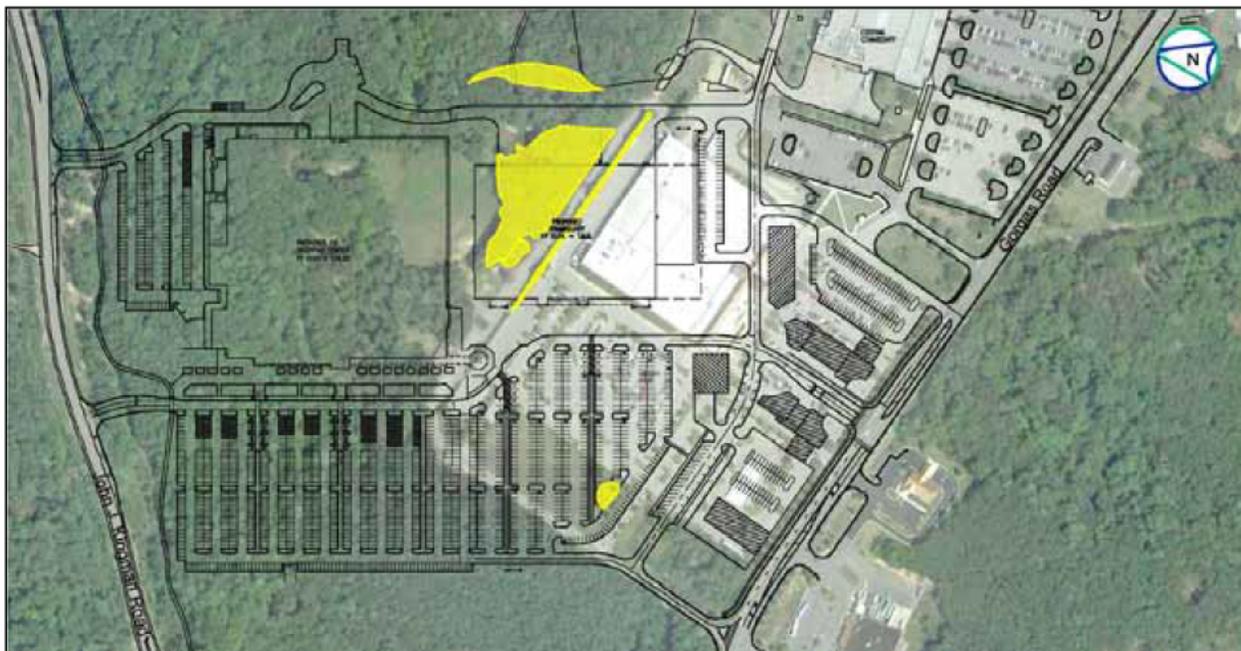


Figure 13: Future Tree Clearing Areas

The Applicant has not fully completed the design of the project's stormwater management system; however, the submission states that the design will mirror the PX center system (using vegetative bio-swales and other low impact design features), and meet stormwater standards for Fairfax County; Commonwealth of Virginia; Chesapeake Bay Protection and Restoration Act; and Energy Independence and Security Act (EISA), Section 438.

PROJECT ANALYSIS/CONFORMANCE

Analysis

Based on review of the project against the NCPC Comprehensive Plan and existing Fort Belvoir Master Plan, NCPC staff recommends that the Commission **approve the preliminary building plans for the new Commissary on the North Post of Fort Belvoir, but defer action on the preliminary site development plans due to inadequate information on the applicant's reforestation plan, as well as proposed parking and stormwater management.** Staff continues to have questions about the project's forecasted customer parking demand; whether or not there is a need for separate employee parking; and how the site plan will comply with stormwater standards for the Commonwealth of Virginia, EISA (Section 438), Fairfax County, and Chesapeake Bay Protection and Restoration Act. Staff has requested submission of a detailed future customer parking demand analysis from the Applicant during previous consultations, and

has yet to receive this information. In addition, due to the previous PX center project's removal of trees and the current proposal's plan to remove an additional 3.3 acres of trees, the Commissary's stormwater management design is critical to mitigate this largest environmental impact. As such, although the project submission states that the completed design will comply with a number of different standards (EISA, Section 438; Commonwealth of Virginia; Fairfax County; and Chesapeake Bay Protection and Restoration Act), staff nevertheless recommends deferral of site plan approval until the design is more fully developed and detailed quantitative data is provided to NCPC that demonstrates compliance with these standards.

Therefore, staff recommends that the Commission request the following additional information from the Applicant prior to submitting for final approval:

- **Information on the tree reforestation plan being developed for the Master Plan update**
- **Documentation on the project's compliance with stormwater management standards from Fairfax County; Commonwealth of Virginia; EISA, Section 438; and Chesapeake Bay Protection and Restoration Act using quantitative information in the final project submission**
- **A detailed forecast of projected customer demand for the shared parking lot, including forecast assumptions, parking standards, customer demand overlap, and detailed quantitative demand information.**

Furthermore, staff recommends that the Commission recommend the following modifications to the final site development plans in order to minimize impervious surfaces and deforestation, and maximize use of the main customer parking lot:

- **The elimination of a separate employee parking lot**

Staff notes that the proposed customer parking for the Commissary has 80 fewer spaces than the existing Commissary.⁶ Also, the total number of spaces (for both the PX center and Commissary) in the shared lot averages out to 3.8 spaces for each 1,000 square feet of gross floor area (GFA), which is lower than other comparable developments that provide between 4.0 and 6.5 spaces per 1,000 square feet of GFA.⁷ A majority of the project site is located on previously disturbed land (occupied by the existing PX store), and the project is part of a larger planned town center development, which will be designed to provide enhanced pedestrian access by nearby residents. The forecourt area in front of the new building will be part of a larger north-south "pedestrian

⁶ The current Commissary has a parking lot with 668 total customer spaces.

⁷ Fairfax County standards allow an average of 4.8 spaces per 1,000 square feet of GFA for similar uses (shopping centers with between 400,000 and 1,000,000 square feet of GFA). Between the Commissary (137,000 square feet) and PX center (270,000 square feet), the combination of the two uses could be considered a "shopping center" use for the purpose of comparing the proposed parking with the parking standards for the neighboring jurisdiction.

spine”, which will connect the future PX center (located to the north of the new Commissary); new Commissary; and the planned future commercial/residential town center development. These features are consistent with NCPC staff recommendations during consultation with the Army and the Defense Commissary Agency (DeCA). Lastly, the future parking lots will be designed with spaces constructed with permeable pavement (and other low impact development features) to help mitigate the development’s stormwater impacts. Therefore, staff recommends that the Commission **note that the Applicant has worked with NCPC staff on the development of a North Post Town Center Small Area Plan in response to previous Commission comments.** The Army provided the Commission with an informational presentation about the planned North Post Town Center at its meeting on July 12, 2012 in order to offer additional background on the town center’s framework design.

Comprehensive Plan for the National Capital

The Comprehensive Plan for the National Capital provides goals and policies that guide the Commission in evaluating and acting on plans and projects in the National Capital Region. Staff has determined that the proposed project is consistent with the following policies from the Federal Workplace, Transportation, and Federal Environment Elements of the Comprehensive Plan for the National Capital.

1. Develop sites and buildings consistent with local agencies’ zoning and land use policies and development, redevelopment, or conservation objectives, to the maximum extent feasible.
2. Provide employee clothes lockers and showers at federal buildings and on federal campuses to support bicycle commuters. Space should be reserved in new facilities to allow for the provision of showers and lockers to support the bicycle commuting population.
3. Encourage federal employees to rideshare, including the use of carpools, vanpools, privately leased buses, public transportation, and other multi-occupant modes of travel.
4. Provide parking for disabled persons in accordance with federal law.
5. Minimize development of open space by selecting disturbed land or brownfields for new federal workplaces or by reusing existing buildings or sites.
6. Provide secure ... bicycle parking spaces or bicycle lockers in close proximity to building entrances at federal buildings and on federal campuses.
7. Use pervious surfaces and retention ponds to reduce storm water runoff and impacts on off-site water quality.
8. 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.

Staff has determined that the proposed project is not consistent with the following policies from the Transportation and Federal Environment Elements of the Comprehensive Plan for the National Capital.

1. Place parking in structures, preferably below ground, in the interest of efficient land use and good urban design.
2. For suburban federal facilities beyond 2,000 feet of a Metrorail station, the parking ratio (1:1.5-1:2) will reflect a phased approach linked to planned improvements over time.

NCPC staff notes that the site plan shows 66 employee spaces, which equates to a 1:1.3 ratio (7 spaces too many) using the assumption that part-time workers utilize their spaces for ½ the time of full-time employees. As such, the 53 part-time employees only require 27 spaces to satisfy their parking demand, rather than the 36 spaces that would be allowable for full-time employees using the 1:1.5 ratio. Thus, the Comprehensive Plan ratio will allow a total of 59 employee parking spaces for the project based on the future full-time and part-time employee population.

Fort Belvoir Master Plan

The land use designation for the project site in the 1993 Fort Belvoir Master Plan is “Community”, and the project is consistent with the designation. The Community use is defined as “land use that encourages a mix of uses. Facilities allowed include religious, family support, personnel services, professional services, medical, community, housing, commercial and recreational services. Users live both on- and off-post and may include soldiers, dependents, retirees, and other civilian personnel.” Staff has previously reviewed the draft Long Range Component of the Fort Belvoir Master Plan and provided comments to the Army on the plan as part of the on-going update process.

National Environmental Policy Act (NEPA)

The Army studied the Commissary project's impact to the natural environment through an Environmental Assessment (EA) that was completed in 2010. The EA analyzed the new Commissary as part of the proposed future North Post Town Center development, which is shown in Figure 13.



Figure 14: North Post Town Center – Preferred EA Alternative

The Army issued a Finding of No Significant Impact (FONSI) on September 28, 2010 to complete their NEPA review responsibility for the project. For federal projects in the environs, NCPC does not have independent NEPA responsibility.

National Historic Preservation Act (NHPA)

Regarding Section 106 of the NHPA, the Army determined, and the VA SHPO concurred, that the project will have “No Adverse Effect” on historic properties. Due to the project’s location in the environs, NCPC does not have independent Section 106 responsibility.

II. CONSULTATION

Coordination with local agencies

In accordance with the Commission’s Procedures for Intergovernmental Cooperation in Federal Planning in the National Capital Region, the preliminary plans for the project were referred by NCPC to the Virginia Department of Transportation (VDOT), the Virginia Department of

Environmental Quality (DEQ), the Washington Metropolitan Council of Governments (Wash COG), the Northern Virginia Regional Commission (NVRC), and Fairfax County on July 10, 2012. The comments provided from Fairfax County staff (dated August 29, 2012) and the Northern Virginia Regional Commission (dated August 9, 2012) primarily dealt with the project's potential stormwater management impacts, and ensuring that the final design complies with Fairfax County and new Commonwealth of Virginia (2011) standards. Copies of these letters are included in Appendix E and Appendix F.

III. APPENDIX A – COMMISSION COMMENTS ON PX CENTER CONCEPT DESIGN

COMMISSION ACTION

NCPC File No. 7096



FORT BELVOIR – NORTH POST
POST EXCHANGE (PX) SHOPPING CENTER

Fairfax County, Virginia

Submitted by United States Department of the Army

July 1, 2010

Commission Action Requested

Approval of comments on concept design, pursuant to 40 U.S.C. § 8722(b)(1)).

Commission Action

The Commission:

Provides the following comments on the proposed design concept for the new Fort Belvoir Post Exchange (PX) Shopping Center, as shown on NCPC Map File No. 2204.10(38.00)43043.

- **Recommends** that new parking be provided using multi-level garages or surface lots that are constructed with pervious paving material(s) to minimize the amount of new impervious surface on-site. In addition, all new surface parking lots should be designed to maximize the amount of landscaping such as through the use of landscaped islands and perimeter landscaping, and utilize appropriate low impact development (LID) stormwater practices;
- **Recommends** that the 1,085 parking spaces proposed as part of this project be utilized for the entire planned future North Post Town Center to include the new PX shopping center, new commissary building, and all other new retail and residential buildings constructed as part of the full town center development;
- **Recommends** that the new PX shopping center be constructed as a multi-level building rather than a single-level building as proposed, or as a single-level building with a “green” roof to minimize the amount of new impervious surface on-site;
- **Recommends** that all new construction related to the project be limited to areas that minimize tree loss to the maximum extent possible;

APPENDIX A (CON'T.)

NCPC File No. 7096

- **Recommends** that the Army closely coordinate with the Commonwealth of Virginia and Fairfax County as the design of this project and all future projects are developed and finalized.

Deborah B. Young
Secretary to the National Capital Planning Commission

**APPENDIX B - COMMISSION DISAPPROVAL ACTION ON PRELIMINARY PX
CENTER DESIGN**

COMMISSION ACTION

NCPC File No. 7096



**FORT BELVOIR – NORTH POST
POST EXCHANGE SHOPPING CENTER**

Fairfax County, Virginia

Submitted by the United States Department of Defense, Department of the Army

April 7, 2011

Commission Action Requested

Approval of preliminary and final site and building plans pursuant to 40 U.S.C. § 8722(b)(1).

Commission Action

The Commission:

Disapproves the preliminary site and building plans for a new Post Exchange Shopping Center at Fort Belvoir, as shown on NCPC Map File No. 2204.10(38.00)43257.

Requires the applicant to submit an updated master plan in accordance with the National Capital Planning Act that includes a reforestation plan addressing replacement of trees lost due to construction projects on the Post.

Notes that the Fort Belvoir master plan was last approved in 1993 and that the Commission has issued multiple unfulfilled requests for an updated master plan that reflects the current and future growth at Fort Belvoir; and therefore, due to a lack of sufficient information necessary to properly analyze projects the Commission may find it difficult to approve any future proposals until such time as an updated master plan is submitted.

Deborah B. Young
Secretary to the National Capital Planning Commission

APPENDIX C – ARMY RESPONSE TO COMMISSION'S DISAPPROVAL ACTION

Attached are responses to questions posed for the PX.

RESPONSES TO COMMENTS FROM NCPC'S 7 APRIL 2011 COMMISSION MEETING ON THE FORT BELVOIR PX SHOPPING CENTER:

Responses below follow staff input:

As you know, at its April 7th, 2011 meeting, the Commission modified our proposed staff recommendation from Preliminary and Final site and building plan approval, to Preliminary site and building plan approval for the proposed Post Exchange Shopping Center. In addition, the Commission disapproved the modified Preliminary site and building plans recommendation. The Army is therefore required to submit the project for final review. If the Army disagrees with the Commission's action, then the Army is required to submit a response stating the Army's disagreement with the Commission finding, and include any additional information that the Commission should take into consideration prior to its final action. NCPC Staff will recommend either approval or disapproval based on your response. Currently, we have added the PX Shopping Center project to our tentative May Commission meeting agenda for Commission action on the final site and building plans.

For your convenience, I have included a list of "guidance" questions below to assist you in preparing your response. These questions were developed based on the video of the Commission meeting, and are provided to help direct your response so that it best addresses the Commission discussion and action. However, you may ultimately provide any response that you deem appropriate. Please see questions as follows:

1. North Post Town Center – How much opportunity is there to revise/re-shape the planned North Post Town Center design? How does the proposed North Post Town Center design compare with the existing South Post Town Center in area, # of uses, types of uses, density, and number of parking spaces? Are there any similar uses (to the proposed PX Shopping Center) located adjacent/nearby the South Post Town Center? How much of the future town center's development will be located within 2,000 feet (commonly accepted distance that a person will walk) of the PX Shopping Center's entrances?

There is little opportunity to reshape the PX and Commissary portions of the North Post Town Center Design. The remainder of the Town Center's design is a part of the Installation's future development master plan and certainly could be re-shaped/revisted. A concept layout for the Town Center was included in the Environmental Assessment for the PX Shopping Center project.

The PX and Commissary are key elements of the new Town Center and have been located immediately adjacent to one another to provide one-stop shopping for the large off-post population served. Access to the site off the Fairfax County Parkway and Kingman Road will provide easy access for the population served. Also the new Access Control Point planned opposite Pence Gate along Route 1 will provide easy access for patrons coming north along the route 1 corridor.

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The area for the South Post Town Center, bounded by 12th Street, 16th Street, Gunston Road and Belvoir Road, is approximately 68.9 acres.

The area for the North Post Town Center, bounded by Stonewall Jackson, Kingman Road, Woodlawn Road and Gorgas Road (minus a small portion to the NE) is approximately 63.61 acres.

The South Post Town Center area combines immediately adjacent housing (Herryford Village) with small shops along 12th Street and expanding Morale, Welfare and Recreation (MWR) support facilities (relocated tennis courts from the USO project, playgrounds, bowling alley complex, skate park, etc.). Other facilities within 2,000' of the South Post Town Center include a Chapel, a Child Development Center, a Gym/Field House, outdoor recreation fields, and the Post Library. Vernondale and Cedar Grove Villages also fall within the 2,000' established for walking, as does Herryford Village and a small portion of Colyer Village.

The current North Post PX shopping area supports a very large off post population (96% off post to 4% on post population served). The current plans call for the replacement of this store with the construction of a new PX which also incorporates two facilities and functions from the south post--the 4-Seasons Store (an outside Garden Center and related furnishings, etc.) and the Military Clothing Sales Store, followed by a new Commissary on the footprint of the old PX, which is to be demolished. The future development of the North Post Town Center identifies and supports the build-out opportunity for up to 100 (+/-) new family housing units, shops and some office space opportunity. Existing facilities within a 2,000' walk from the North Post Town Center include--the North Post Chapel, a service station/small shoppette, a fast food facility, bank, Graves Physical Fitness Center, the Installation's Military Dining Facility, an outdoor pool, along with future plans for a new Child Development Center (awarded for construction), a car wash facility, a new Tire Store/Car Care Service Center, and a new full service restaurant.

2. Proposed Surface Parking / Single-Level Design – What is the percent break-down of where the Post Exchange Shopping Center patrons will travel from (i.e. XX% from off-base, XX% from on-base) ? How does the PX Shopping Center design compare with other PX designs (on average) from around the country (i.e. area, # of parking spaces, parking spaces/employee or square foot, Are there shower facilities typically provided for employees ? Do other designs have cool roofs ? Do any other PX lots have pervious spaces, etc.) ? Would the Army consider limiting the total proposed parking (985 spaces) as part of this project, to serve the entire future North Post Town Center ? If not, why ? Discuss the costs of structured parking vs. surface parking, and why structured parking is deemed not feasible for this project ?

The current population served by the AAFES PX includes some 5,167 on-post population (4%) and some 122,018 (96%) from off post (figures from AAFES).

Store size is based on the customer population served and the sales generated by the store. The Fort Belvoir store is sized based on the on-post and off post population, with the NCR

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having a very large active duty and retired military population. Store sizes range from 50,000 SF to what is considered the Module 2 store stores which is the largest store size built currently. The new AAFES store size will be a Module 2 store and will be one of the largest in CONUS.

The AAFES standard for parking is 4.0 spaces per 1000 GSF. Fairfax County has a similar standard. During design and in working with NCPC and Fairfax County the new store parking was reduced from its design allowance of 1080 spaces to approximately 985 spaces (or 95 spaces less than authorized). Shower facilities are not required, or normally provided in CONUS facilities; however, the Belvoir facility will provide shower facilities for its employees.

At this time there are no other AAFES facilities with pervious parking. This is normally due to the local Base/Post not having an O&M program to support pervious parking. AAFES worked closely with Fort Belvoir and comments from NCPC and Fairfax County in developing parking areas incorporating pervious pavement to help reduce Storm Water Management requirements on the site. Also of note, the pervious pavement will be pervious concrete (versus asphalt) which has a higher albedo and will significantly reduce the heat island affect of parking areas. The installation will increase its support contract cost to support the new pervious pavement option.

Currently there are approximately 1630 existing parking spaces to support the PX and Commissary stores in separate but adjacent facilities (walking is not currently common between the two facilities given distance and packages/groceries). The current plans also moves the 4-Seasons Store (69,220 SF) and the Military Clothing Sales Store (10,419 SF) from the south post to the new PX Complex, increasing store size from 141,970 SF to 270,000 SF. The new Commissary Store will also increase in size to serve its increasing customer base from 115,000 SF to between 130,000 and 140,000 SF. The new Commissary will add approximately 560 parking spaces bringing the total parking count down from the current 1630 to 1545 spaces. This reduction also includes the addition of the two new facilities noted. The synergy developed by the collocation of the two stores has allowed the reduction in overall site parking for the complex to the current levels.

To reduce the total parking for the shopping complex to that required for the PX facility alone (985 spaces) would adversely impact the ability for patrons to find parking at the new shopping complex and result in loss revenue to the Army, the AAFES (PX), the Defense Commissary Agency (DeCA), and the installation support services. One also must consider the large percentage of off-post shoppers to the complex and the shopping habits of the patrons (many come only once or twice a month and make large food and convenience purchases for the month). Parking for the new housing area or other facilities within the north post town center would in turn require separate parking for those activities as development occurs.

Structured parking costs were considered in the initial planning and discussions on the site's development. The decision to build surface parking was made based on overall project costs and the project's Return on Investment (ROI). Two thirds of the net earnings

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from AAFES business is returned to the local installation's Morale, Welfare and Recreation (MWR) fund to support MWR programs. Without adequate returns, a project would not be built and in turn funding to the MWR programs would be significantly reduced. Costs for structured parking runs between \$18,000 and \$22,000 per space compared with \$4,000 to \$5,000 per space for surface parking. This delta here represents a cost difference of some \$16M for the final 985 parking count identified for the PX facility. The project cannot support such a cost increase and meet ROI requirements, as well as meet MWR resourcing goals in support of soldiers and their families, as the ROI would be significantly impacted.

3. Proposed Tree Replacement – Why is the Army not proposing to replace the trees removed at a 2:1 ratio? How was the decision made to replace only 60% of the trees removed as 2.5" Caliper trees – why not replace all of the trees removed, with 2.5" Caliper or larger trees? What is the expectation about how many of the replanted trees will ultimately survive? Will any trees that do not survive be replaced? Would the Army consider revising the shopping center design to meet the District of Columbia parking lot tree-related regulations referenced by the Commission (see attachment – Section 1510)? How does the current design compare with these D.C. tree-related regulations (see attachment – Section 1510)?

The decision to replace on a 1:1 basis with a combination of 2 1/2" trees and tree tubes was part of the negotiations in the development of the Memorandum of Agreement between the Installation and AAFES. Such negotiations with AAFES (and likewise with DeCA– Commissary Agency) are common and tied to initial costs, the proponent's Return on Investment (ROI), and MWR support and payback noted above. The Army works closely with AAFES in their construction programs to reach an acceptable standard given that two thirds of the net earnings from AAFES operations come back to the Installation each year to support installation MWR programs.

The installation's selection of a 2.5" tree replacement was made based on the Post's past experience in that size this tree affords the best combination of instant positive impact in the landscape with a good chance of surviving the establishment period given proper cultural care. The contract calls for a maintenance period of one year. Trees that are dead or dying following the one year warranty would be replaced in kind. Given the one year warranty period one should expect a 75% to 80% survival rate for the 2 1/2" tree plantings. Larger trees experience a greater "shock" and have less chance of survival. Also, large mature trees come with a very expensive cost for replacement. Trees in the 24" to 30" size can cost up to \$10K per tree or more depending on the species given the expense and special equipment to dig, transport and replant. Tree tubes have a reduced survival rate, in the 50% range.

Section 1510.7 of the referenced D.C. standard calls for one canopy tree for every 5 parking spaces. The D.C. criteria would require some 197 trees for the 985 parking spaces in the current design. The IDG requires trees approximately every 10 parking spaces. There are currently some 191 canopy and evergreen trees scheduled for planting in and immediately around the two parking lots. The use of pervious pavement in the parking aisles has reduced the ability to plant the normal number of trees required by our IDG. This

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decision was made based on the overall storm water management plan and its goal to reduce the overall site footprint through the use of pervious pavement combined with underground detention. While the numbers proposed for planting represent a combination of canopy and evergreen trees versus D.C.'s canopy tree requirement, the landscape plan is felt to be consistent with the IDG and with the D.C. requirement for proper screening of large parking areas. Design review by the DPW has recommended additional trees be planted to help shade the employee/customer pick-up parking lot to the north of the facility, again staying outside of pervious pavement areas. The landscape plan will be also be reviewed with the goal of adding additional plantings where possible to the east and west sides of the site to increase screening to the parking and delivery side of the complex. Also, the facility will provide some 90 bike racks, exceeding the District's requirement of 70.

4. Tree Reforestation Plan – What information might a future potential Tree Reforestation Plan component (included in the future master plan update) address (i.e. replacement policy for trees that don't survive as part of this project?, off-site areas identified for replanting?, etc.)? Will the Army develop and include a Post-wide Tree Reforestation Plan component within the future master plan (LRC) update? Are there other "industry" methodologies/standards for measuring tree removal/replacement such as replacing removed trees with comparable-sized trees, and would the Army consider using these other methodologies/standards for future projects, rather than the current # for # (i.e. 1:1 or 2:1) replacement method?

Survivability of trees has been addressed in (3) above) regarding the contract warranty provisions. A tree reforestation plan will be addressed in the Real Property Master Plan update as requested. Tree replacement is also a part of the Installation's Natural Resource Management Plan. Replacement of trees with "comparable sized trees" has been addressed in (3) above and is cost prohibitive, especially for large scale projects. Other methodologies are currently being identified for tree replacement—NCPC suggestions here would be welcomed.

Other information:

The building and site design are being designed to meet LEED Silver requirements, incorporating energy efficient mechanical, electrical and plumbing systems to include low-flow toilet fixtures, high efficiency water heaters, low mercury lighting, daylighting and high efficiency wall and roof insulation.

Incorporates low glare, high energy efficient LED lighting in the parking lot lighting.

Cool roof technology with the selection of a white roofing membrane (again reducing the heat impacts to the site).

The facility has brick on all 4-sides not common with normal "Big Boxes" which often only place brick on the front façade.

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Large fenestrated openings along the front and side of the building promote "daylighting", openness and articulate the exterior design, along with a highly detailed skylit, clerestoried "market Hall" and skylit interior retail spaces.

Regional, recycled, low-emitting materials have been selected for construction and sustainable construction practices will be implemented throughout the project.

The covered walkway and gazebo will provide easy access between the PX and future Commissary as well as provide drop off point for the installation shuttle service due to begin this summer.

Thanks for the opportunity to provide responses to NCPC questions and concerns. Should you have additional questions please Richard Turner or Chris Landgraf.

In light of the aggressive project schedule for the Post Exchange Shopping Center, we would like to keep this project on our May 5th, 2011 Commission meeting agenda. In order to do so, we would need to receive your response as soon as possible, since the submission deadline for the meeting has already passed. Ideally, we would receive your response by close of business on April 21st. Please do not hesitate to contact me with any further questions or comments at the number provided below.

APPENDIX D - COMMISSION DISAPPROVAL ACTION ON FINAL PX CENTER DESIGN

COMMISSION ACTION

NCPC File No. 7096



**FORT BELVOIR – NORTH POST
POST EXCHANGE SHOPPING CENTER**

Fairfax County, Virginia

Submitted by the United States Department of Defense, Department of the Army

May 5, 2011

Commission Action Requested

Approval of final site and building plans pursuant to 40 U.S.C. § 8722(b)(1).

Commission Action

The Commission:

Acknowledges receipt of the Army's April 20, 2011 response to the Commission's April 7, 2011 preliminary action, as required by Section 5 of the National Capital Planning Act.

Disapproves the final site and building plans for a new Post Exchange Shopping Center at Fort Belvoir, as shown on NCPC Map File No. 2204.10(38.00)43328, as the proposal is not fully responsive to the Commission's concerns expressed at the preliminary review stage regarding the substantial tree loss resulting from the project and the overall site planning of the Post Exchange and North Post town center.

Notes that the lack of approved master plans impairs the Commission's ability to ensure the comprehensive planning and orderly development of the National Capital, and therefore **requires** the applicant to submit an updated master plan that includes a reforestation plan addressing replacement of trees lost due to construction projects on the Post, noting that the Commission may find it difficult to approve any future proposals until such time as an updated master plan is submitted.

Deborah B. Young
Secretary to the National Capital Planning Commission

**APPENDIX E – FAIRFAX COUNTY STAFF COMMENTS ON PRELIMINARY
COMMISSARY DESIGN**



County of Fairfax, Virginia

To protect and enrich the quality of life for the people, neighborhoods and diverse communities of Fairfax County

August 29, 2012

Christine Saum
Director, Urban Design and Plan Review
National Capital Planning Commission
401 9th Street, NW
North Lobby, Suite 500
Washington, DC 20004

Dear Ms. Saum:

Thank you for the opportunity to provide comments on the preliminary review submission for the Fort Belvoir Commissary, NCPC File Number 7150. In collaboration with the Department of Public Works and Environmental Services (DPWES), Fairfax County Park Authority, and Fairfax County Department of Transportation, the Department of Planning and Zoning has reviewed the submitted documents and offer the comments attached. Please note that these comments have not been endorsed by the Fairfax County Board of Supervisors.

In September of 2010, we reviewed and provided comments on the Environmental Assessment and Draft Finding of No Significant Impact for the New Commissary, Post Exchange, and Future Mixed Use Development. As described in the submission documents, the Commissary will consist of a 140,000-square-foot one-story retail building with 588 surface parking spaces. The Commissary will be located on a 15-acre site, a majority of which has been developed and is presently occupied by the Post Exchange. A wooded area of approximately 3.3 acres in size will be cleared to accommodate construction of the new Commissary. Our previous comments focused on the amount of impervious surface created by a single-story design with surface parking, and recommended a two-story building and structured parking be considered to limit impacts on stormwater runoff, ground and habitat disturbance, Resource Protection Area (RPA) encroachment and tree removal.

We remain disappointed that this alternative for the Post Exchange and Commissary was rejected as too costly or impractical; however, we recognize that the Commissary is being redeveloped in coordination with plans for the Post Exchange, and as such, our comments focus solely on the plans for the Commissary. The preliminary nature of the stormwater plans in this submission makes it difficult to provide substantive comments; therefore, staff requests that more detailed plans be provided at a later date to ensure that stormwater management facilities will conform to new guidelines/requirements for sites given the goals of the Chesapeake Bay Total Maximum Daily Load (TMDL) as well as the new Virginia stormwater regulations adopted in 2011 which require a "runoff volume reduction" approach. Additional details and remarks related to

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Department of Planning and Zoning
Director's Office
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www.fairfaxcounty.gov/dpz/



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Christine Saum
August 29, 2012
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transportation, green building, and cultural and natural resources are included in the attached comments.

If you have any questions about our comments, please contact Kimberly Rybold at kimberly.rybold@fairfaxcounty.gov or at 703-324-1363.

Sincerely,



Fred R. Selden, Director
Department of Planning and Zoning

FRS: KMR

Attachments: As Stated

cc: Marianne Gardner, Planning Division Director, DPZ
Laura Miller, Fairfax County BRAC Coordinator, Fairfax County Department of Transportation
Fred Rose, Chief, Watershed Planning & Assessment Branch, Stormwater Planning Division, Department of Public Works and Environmental Services
Sandra Stallman, Manager, Park Planning Branch, Fairfax County Park Authority
Pamela Nee, Chief, Environment and Development Review Branch, DPZ
Maya Dhavale, Senior Environmental Planner, EDRB, DPZ
Kimberly Rybold, BRAC Senior Planner, PD, DPZ

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**Fort Belvoir Commissary
Preliminary Design Submission, July 2012**

Comments from Fairfax County Staff, August 2012

Staff Contact: Kimberly Rybold, kimberly.rybold@fairfaxcounty.gov; 703-324-1363

We have reviewed the Fort Belvoir commissary preliminary design submission and offer the following comments:

Stormwater Management

The project location for the Post Exchange and Commissary straddles the Accotink Creek and Dogue Creek watersheds; most of the development will occur within the Accotink Creek watershed, although some runoff may be directed into Dogue Creek.

The proposed building is a single-story design with no structured parking. While there is mention of pervious paving and LEED/sustainable strategies for stormwater management, there is still the potential for stormwater impacts. Some of these impacts could be mitigated with a reduction in impervious surface.

The preliminary submission for the Commissary states that the means and methods which will be used to meet stormwater requirements will mirror those proposed for the PX project, and will comply with the stormwater requirements of various federal, state and local regulations, including the Fairfax County Public Facilities Manual (PFM). Although the preliminary submission mentions the planned use of innovative BMPs like pervious pavement, infiltration areas, under-pavement storage/infiltration and "some surface stormwater facilities" for both the PX and Commissary, these are not described in detail; the document states that "the specific design of the stormwater management system for the Commissary area has not been well defined." More information is needed regarding the designs under consideration, particularly for the "surface stormwater facilities," and plans to prevent impacts to receiving water bodies. As a federal facility, the Stormwater Planning Division (SWPD) expects that stormwater management will at least conform to new stormwater management guidelines/requirements for sites given the goals of the Chesapeake Bay Total Maximum Daily Load (TMDL). If this is adhered to, we believe the design will conform also to the new Virginia stormwater regulations adopted in 2011 which require a "runoff volume reduction" approach. This approach is more effective in reducing volume of runoff as well as pollutants of concern and will be more beneficial in reducing harmful stream impacts than current Fairfax County PFM requirements. In addition to meeting water *quality* benefits (nutrients and sediment reductions) stipulated by the Chesapeake Bay TMDL, the Army should ensure that the combined water *quantity* benefits of the proposed BMPs result in no net increase in stormwater runoff from any expanded impervious area. In addition, any existing runoff currently being directed to Accotink Creek must be reduced according to the requirements of the Accotink flow TMDL. SWPD staff request permission to review the stormwater management system design plan(s) for both the PX and Commissary when completed.

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The draft FONSI promises stable outfalls and stream bank stabilization/restoration for receiving waters (Accotink and/or Dogue Creek depending on outfall placement in the project area). To ensure consistency relating to adequate outfalls and stormwater detention, the county PFM requires "detailed outfall analysis" including calculations as described in the Department of Public Works and Environmental Services' Letters to Industry (see <http://www.fairfaxcounty.gov/dpwes/publications/lti/03-10.htm>). The FONSI did not include details regarding streambank stabilization and/or restoration; SWPD presumes this information will be included as part of the design plan for the still-developing stormwater management system for the Commissary site. The watershed management plans for the Accotink and Dogue Creek watersheds propose improvements to repair degraded streams and present opportunities to collaborate with the County on needed downstream improvements, especially where proposed development and/or redevelopment is expected to increased impacts. SWPD would welcome the opportunity to consult with the Army on BMP design and placement and to offer assistance in the restoration of receiving streams.

Green Building

It appears uncertain if LEED Silver certification is actually being sought through the Green Building Certification Institute (GBCI) or if the building is only being designed to be capable of achieving certification. It is never clearly stated that the building will achieve LEED Silver certification, as has been done in previous documents as well as for the Post Exchange.

Natural Resources

The selected build option has the lowest overall impact to natural areas of the build options considered with approximately 3.3 acres of trees in to be removed. However, similar to the stormwater design review comments, the preliminary nature of the documents provided for the Fort Belvoir Commissary are not of sufficient detail to offer substantive comments on natural resources impact.

The Environmental Assessment (EA) for the project discussed mitigation in several places to include the list of mitigation measures beginning on page 4. The mitigation measures include a stated goal of improving the condition of remaining natural areas. The Army should incorporate these stated goals from the EA into the project plans to protect and improve the condition of Systems 1 and 2 (as identified in the EA) and the receiving (for water) and connecting remaining natural areas east of Woodlawn Road and west of Gunston Road. The stated mitigation measures include some very sound goals; however, they do not address the two most pressing issues for natural resources after human disturbance:

- The stated goals should include a plan to survey for and control non-native invasive (NNI) species particularly plants. Conditions favorable to the spread of existing invasive species and introduction of new invasive species may result from the massive fragmentation and disturbance caused by the proposed project. The NNI control plan should include a baseline inventory of existing NNIs in Sections 1 and 2 as well as the connecting natural areas, and a plan and budget to control NNIs for at least three years to

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include at least two years after construction. The Park Authority Natural Resource Management and Protection Branch will be happy to discuss the NNI control plan with the Army.

- The mitigation goals must address the severe browse by white-tailed deer. No restoration will succeed if white-tailed deer are overabundant as they will eliminate all native vegetation on the ground up to about 5 feet, will prevent forest regeneration, and will cause remaining forest stands to shift to a few native species that are less palatable to deer and to NNI plant species that deer do not eat. The result will be extremely impoverished natural areas lacking native plant diversity and many of the animals that rely on those plant communities will disappear. Fort Belvoir needs to have an active deer management plan with the stated goal of conducting periodic inventories to determine deer herd numbers and health, and continued hunting and sharpshooting pressure to reduce deer numbers to as close to 20 deer per square mile as possible. Fifteen to twenty deer per square mile represents the ecological carrying capacity for deer in eastern forests. Once deer numbers exceed this capacity they begin to cause significant and long term damage to the forests. In most of Fairfax County deer herd numbers are at least 60 deer per square mile and our forests are highly impacted.

Transportation

A transit route is shown running up Gunston Road and on Kingman Road to the west, but it is not stated whether the transit route will be diverted to directly serve the Commissary and retail plaza. Reducing the walking distance to a stop could increase bus ridership. Additionally, the plans do not show the location of the Gunston Road bus stop. If the route is not proposed to enter the Commissary site, it would be beneficial to show the bus stop on the plans.

The plans also should indicate which bus routes are running in the vicinity of the Commissary site. It is presumed that the transit route shown is Fairfax Connector Route 335 (the Eagle Express). Staff requests a status update of the potential rerouting of the REX route on-base to serve the Commissary and retail plaza site. Staff also requests that any information on internal shuttle(s) be shared, including whether a shuttle to serve the Commissary site is planned, and if so, the timing of implementation.

Off-site existing bicycle facilities are shown on the neighborhood context map, but not on the actual plans. It would be helpful to illustrate where these bicycle pedestrian facilities are located on the plans as well as on-site bicycle/pedestrian facilities. Any planned facilities in the area should also be shown. It would be helpful to see how people will travel to, from and around the adjacent town center site. A bicycle/pedestrian circulation plan should be added to the list of figures.

With respect to the employee parking area, it is not possible to determine its location. Specifically, is it the small lot on the south side of the building? In any case, it should be labeled.

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Confirmation is requested as to whether a new signal on Gorgas Road at Main Street is proposed, as Figure C-4 seems to indicate. In addition, any other any new traffic signals, such as a signal at the new intersection with Kingman Road should be shown or listed with plans provided sufficient to show geometry.

Cultural and Heritage Resources

Staff concurs with the Virginia Department of Historic Resources (VDHR) letter dated Sept. 9, 2010 on the draft EA for construction of the new commissary. The VDHR concurred with Ft. Belvoir that the undertaking will have little impact to historic and cultural properties.

One archaeological site, 44FX1813, is located within the construction footprint. DHR determined the site not eligible for National Register (NR) listing in 1994. Eight archaeological sites (44FX1408, 44FX1210, 44FX1589, 44FX1590, 44FX1814, 44FX1815, 44FX1816, and 44FX1942) are located proximal to the construction area. Furthermore, the Fairfax County Civil War sites inventory indicates an area of Civil War activity within 0.5-mile of the project area. These resources will either not be impacted and/or have been deemed not NR eligible by DHR. However special considerations were made for Site 44FX1208, the Lacey Cemetery (a.k.a Lacey's Hill Cemetery) due to the funerary nature of the site.

Staff previously concurred with the mitigation measures stipulated in the EA, Cultural Resources Section 3.5.2 Mitigation Measures, for Lacey Cemetery. Excerpt from that section: "A fence will be constructed 50 feet from the Lacey Cemetery for protection and monitored to prevent inadvertent impacts. To reduce the loss of vegetation and prevent any accidental impacts, a 50-foot tree buffer would be established."

The EA does not indicate that the cemetery boundaries have been delineated by professional archaeologists. If no cemetery delineation has been conducted, staff prefers that trenching monitored by a professional archaeologist is undertaken to determine the horizontal extent of burials without impacting interments. Once firmly established, these boundaries can serve as the basis for the 50-foot fenced buffer. Additionally, given the presence of archaeological sites proximal to the construction area, provisions should be made in the event of the inadvertent discovery of archaeological remains.

The Overall Site Plan, page C-1, shows the existing cemetery. Staff recommends that to ensure protection of Lacey Cemetery, that on all new commissary facility construction documents and related site and grading plans the cemetery is labeled as Lacey Cemetery and the previously proposed mitigation cited above is shown.

**APPENDIX F – NORTHERN VIRGINIA REGIONAL COMMISSION COMMENTS ON
PRELIMINARY COMMISSARY DESIGN**

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Hon. Robert W. Lazaro, Jr.

Town of Vienna
Hon. N. Jane Seeman

(as of July 18, 2012)

August 9, 2012

Christine Saum
Director, Urban Design and Plan Review Division
National Capital Planning Commission
401 9th Street, NW
North Lobby, Suite 500
Washington, DC 20004

Re: New Commissary Facility Fort Belvoir, Virginia DeCA Project No. DE08MP11

Dear Ms. Saum:

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 must comply with the local ordinance's stormwater quality requirements.

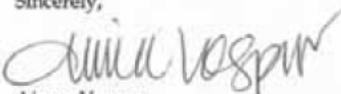
We would also suggest that, where possible, opportunities for retrofit of existing stormwater quantity facilities to stormwater quality facilities through new construction activities should be explored. NVRC's *Guidebook for Maintaining BMPs in Northern Virginia* is available, without charge, should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

The NVRC also encourages project proponents to pursue coordination with the US FWS as well as the VA DCR, should future surveying find that the whorled pogonia (*Isotria medeoloides*) is present in the area.

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

Thank you for this opportunity to participate in the intergovernmental review process.

Sincerely,



Aimee Vosper
Director, Environmental Planning and Services