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IN REPLY REFER TO:
NCPC File No. 6598

JUL - 7 2006

Directorate of Public Works
ATTN: BRAC EIS Comments
9430 Jackson Loop, Suite 100
Fort Belvoir, VA 22060-5116

To Whom It May Concern:

Thank you for opportunity to comment on the scope of the environmental impact statement (EIS) for the Base Realignment and Closure (BRAC) action for Fort Belvoir, Virginia. The National Capital Planning Commission (NCPC) is the federal government's central planning agency for the National Capital Region. NCPC has certain review responsibilities for Fort Belvoir's master plan and individual projects, and therefore seeks to ensure that the environmental documentation provides effective information.

Within the time constraints associated with the BRAC action, we believe that the Department of the Army has made a strong commitment to planning for anticipated growth in a manner that will transform Fort Belvoir into a model of smart, sustainable development. We encourage the Army to continue to seek early and continuous public and stakeholder involvement in this planning process, as it will substantially enhance the outcome of this process. The EIS should consider the BRAC action in the context of the other master plan and project activities, such as the proposed museum.

NCPC prepares the *Comprehensive Plan for the National Capital Region: Federal Elements*, which provides policy direction for federal development (see attached copy). The Federal Elements address many of the topic areas discussed below, such as transportation, historic preservation and urban design, and form the basis of our scoping comments. Three principles shape the Federal Elements:

- **Accommodate federal and national capital activities:** Safely and efficiently accommodate government functions while promoting the highest design quality.

CENTRAL FILE COPY

1909 317 JAN 13

July 6, 2006

Page 2

- **Reinforce “smart growth” and sustainable development planning principles:** Orient development to transit options; protect environmental and natural resources, organize new development in compact land use patterns; promote opportunities for infill development to take advantage of existing public infrastructure, and adapt and reuse existing historic and underutilized buildings to preserve the unique identities of local neighborhoods....recognize(s) the interrelationships between economic growth environmental quality and livability, and the responsibility that citizens have to preserve their communities and quality of life for future generations.
- **Support local and regional planning and development objectives:** We encourage Fort Belvoir to use the Comprehensive Plan policies as a tool in the EIS process to evaluate how, and how effectively, alternatives meet federal planning goals in the region, and to identify measures that could allow alternatives to more successfully reach these goals.

The Belvoir New Vision consultant team has identified options which should form the basis for three alternatives that, at a minimum, should be analyzed in the EIS. The EIS should analyze, for each alternative, how, and how effectively, each alternative addresses the following issues, as well as mitigation measures that would allow each alternative to address impacts or more effectively meet certain planning objectives. The analyses should be comparative, identifying differences between each alternative.

All of the alternatives should be evaluated for how, and how effectively, they can achieve the compact, mixed-use, pedestrian-friendly, sustainable and connected urban designs that represent a significant component of the “Belvoir New Vision Goals.” Where these goals cannot be met, the EIS should identify mitigation to better achieve these goals.

Each alternative in the EIS should provide detailed *comparative* analyses on how, and how effectively, the significant increase in generated trips, and location and mode shifts are addressed, as well as the impacts to the capacity of the surrounding transportation network and the quality of the infrastructure. The alternatives should identify approaches and mitigation that promote transportation mobility, accessibility and multi-modal transportation choices, minimizes single-occupant vehicle use and encourages transit use. The transportation analyses should identify all assumptions regarding transportation infrastructure that will be built, and as appropriate, identify the impacts if infrastructure is not built.

1909 317 JAN 13

July 6, 2006

Page 3

The amount, location and design of parking, as well as parking demand, should be analyzed for each alternative. Analyses should focus on how effectively each alternative minimizes the overall need for parking, minimizes the land demands of parking, and addresses the design of parking facilities to support sustainable, “smart-growth” objectives.

We encourage including extensions of fixed transit services within one or more alternatives. While the need to meet BRAC-imposed deadlines and current financial resources appear to constrain short-term options for fixed transit extensions, inclusion of this feature will provide information that will be useful in evaluating different alternatives and preparing designs that could readily integrate future transit proposals.

Alternative analyses should address improving circulation and connections between the different areas of the Fort Belvoir installation, particularly north and south post. Further, connections and circulation to the surrounding community should be evaluated. This should include identifying and assessing current, proposed or temporary street and access closures resulting from security needs that could impact traffic and circulation.

NCPC recognizes that security measures are critical to ensure force protection and mission continuity. Fort Belvoir will be accommodating uses with different security needs, and as such, this presents opportunities to use site selection, design strategies, and other measures to ensure security and *also* support resident, worker and public access to appropriate facilities and services; provide accessible and well-designed public spaces; and minimize impacts on surrounding communities. The EIS should include information on risk and threat assessments sufficient to identify and evaluate appropriate security measures. We would welcome the opportunity to work with Fort Belvoir regarding strategies to meet both security and urban design objectives, and have also attached NCPC’s *National Capital Urban Design and Security Plan*.

Fort Belvoir includes significant environmentally sensitive areas, including forests, streams, shorelines, and habitat areas. It also contains areas of historic and cultural significance. For each alternative there should be an evaluation of how, and how successfully, the resources will be protected and proposed development will be integrated development with these resources. Where full protection cannot be provided, mitigation measures should be identified. Further, we encourage consideration of alternatives and/or mitigation that improves connections between open spaces on the installation sites as well as to regional systems.

July 6, 2006
Page 4

We encourage inclusion of alternatives that examine the full range of options for locating development to fulfill the development needs created by the BRAC action, such as the use of the airport, golf course, or sites proposed for remediation. Further, we encourage consideration of alternatives and/or mitigation measures that provide additional housing and services at the installation. This will result in useful planning information for decision-makers.

Each of the alternatives should be evaluated for their impacts on air, water and soil, both during construction and long term. Mitigation should be identified as appropriate. Further, Fort Belvoir has areas that require environmental remediation, and the alternatives should be evaluated considering how remediation issues may limit development opportunities, as well as how development may influence remediation strategies.

The significant growth directed at Fort Belvoir will result in increased demands for and shifts in housing, services, retail and office space, not only on the installation, but in the surrounding community. We encourage alternative analyses that identify and evaluate the likely shifts in demand for housing, services and office space, and infrastructure needs. Further, we encourage the Army to continue their coordination with Fairfax County and other stakeholders to determine how the different alternatives could provide opportunities to support local economic and community development objectives; such as future redevelopment along Route 1.

Our agency looks forward to working with Fort Belvoir representatives, other stakeholders, and the consultant team throughout the process. We are currently reviewing prior Commission documents to identify other relevant comments, and will provide those under separate cover as needed. These comments have been prepared by staff and do not reflect an adopted position on the part of the Commission. Please call Julia Koster, at 202.482.7211, if you have any questions or need further information.

Sincerely,



Patricia E. Gallagher, AICP
Executive Director

Attachment

cc: John Cogbill, Chair, National Capital Planning Commission
Ralph Newton, Acting Director, Washington Headquarter Services
Colonel Brian Lauritzen, Field Artillery Installation Commander, Ft. Belvoir

bcc: JKoster
JMann
LSchiffer
GKeller
Reading File
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