

DRAFT
FINDING OF NO SIGNIFICANT IMPACT (FNSI)
ARMY NATIONAL GUARD
Proposed, Base Realignment and Closure (BRAC)-Directed
Expansion of the
Army National Guard Readiness Center (ARNGRC)
Arlington, Virginia

Introduction

The Army National Guard (ARNG) proposes to expand the Army National Guard Readiness Center (ARNGRC) in Arlington, Virginia. Construction would begin in Fiscal Year (FY) 2009. The ARNG has prepared this Environmental Assessment (EA) to identify and evaluate the potential environmental, cultural, and socioeconomic effects associated with the Proposed Action. The ARNGRC is located within Arlington County, about six miles west of Washington, DC and three miles west of Jefferson Plaza 1 (JP-1). The ARNGRC currently employs 1,300 Staff onsite. The ARNGRC occupies approximately 15 acres of land.

On 8 September 2005, the President's Base Realignment and Closure (BRAC) Commission made final recommendations that became law on 9 November 2005. The BRAC Commission recommendations, now law, must be implemented as provided for in the Defense Base Closure and Realignment Act of 1990 (Public Law 101-510), as amended. BRAC Law requires these decisions to be implemented by 15 September 2011. Related to this ARNG proposal, BRAC Law states: "Realign JP-1, Arlington, VA, by relocating the NGB HQ [National Guard Bureau Headquarters], the ANG HQ [Air National Guard Headquarters], and elements of the ARNG HQ [Army National Guard Headquarters] to the ARNGRC, Arlington, VA, and Andrews AFB, MD" (DoD 2005, p. 192). In accordance with this requirement, the ARNG has decided to relocate 1,200 Joint NGB Staff and elements of the ARNG Staff from JP-1 to the ARNGRC; a small ARNG Staff will continue to be located at the Pentagon. This relocation requires expansion of the ARNGRC to accommodate the additional 1,200 Staff. This expansion includes adding onsite office and parking space, as well as other related facilities at the ARNGRC; no land acquisition is proposed.

This EA provides the necessary information to properly and fully assess the potential effects of the Proposed Action as required under the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code [USC] 4321 *et seq.*); the President's Council on Environmental Quality (CEQ) Regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508); and 32 CFR Part 651 (Environmental Analysis of Army Actions, Final Rule, March 2002). In addition, this EA, which includes demonstrated completion of the National Historic Preservation Act of 1966, as amended (NHPA; 16 USC 470) process, meets the requirements set forth by the National Capital Planning Commission (NCPCC) in the NCPCC's Final *Environmental and Historic Preservation Policies and Procedures* (Federal Register Vol. 69, No. 130/8 July 2004, page 41299; NCPCC 2004a).

Purpose and Need

The purpose of the Proposed Action is to comply with the BRAC Commission's recommendation by constructing new facilities at the ARNGRC to support the additional 1,200 relocated JP-1 Staff.

The Proposed Action is needed to increase overall efficiency and reduce operating costs through consolidation and realignment, as required by BRAC. Although a small ARNG Staff would remain located at the Pentagon, it is essential for the rest of the ARNG Staff to be in close proximity to the Pentagon and to each other due to their daily interactions. The Proposed Action is also needed to enhance the ability of the ARNG to fulfill its military mission by providing a facility at the

ARNGRC that meets anti-terrorism/force protection (AT/FP) standards as prescribed in Unified Facilities Criteria (UFC) 04-010-01, the Department of Defense (DoD) minimum anti-terrorism standards for buildings. Under current conditions at the government-leased, commercial JP-1 facility, AT/FP standards are not met and personnel safety is compromised.

Proposed Action

The Proposed Action is to expand the existing ARNGRC office space, East Parking Garage, and other supporting facilities within the fence line of the existing 15-acre site. Other supporting facilities include guard shacks, smoking shelters, and infrastructure/utilities. The Proposed Action includes the following elements:

- Construct, occupy, and operate an approximately 250,000-square-foot (SF), multi-story ARNGRC building addition adjacent to the south of the existing building. The lower levels of the addition, the plaza, would be constructed underground, reducing the ground-level footprint of the building addition while adhering to DoD-required AT/FP design standards related to security setbacks on the installation. The below-ground plaza levels would have a green landscaped roof to retain the open campus setting of the facility. The facility as a whole would be designed and constructed to achieve a U.S. Green Building Council "Leadership in Energy and Environmental Design (LEED) Silver Certification Level". LEED provides the standard for environmentally sustainable construction.
- Construct and operate a multi-level employee parking garage, the E Garage Addition, east of the existing East Parking Garage. This new facility would provide a total of 456 parking spaces to supplement the existing 656 parking spaces (East Parking Garage provides 319 spaces; Southwest Parking Garage provides 337 spaces) onsite. Access to the E Garage Addition would be via the existing East Garage entrance accessed from the eastbound Arlington Boulevard (US Route 50) service road. The new structure would be the same height as the existing parking structure and would extend farther below grade to minimize impacts to neighbors. The E Garage Addition is currently planned for completion by FY 2011.
- Construct and operate supporting facilities, including physical security equipment, mailroom, outside lighting, and below-ground stormwater retention tanks. A number of AT/FP measures would be incorporated into the design. Sustainability principles would be integrated into the design of all facilities to meet LEED Silver standards.
- Remove the existing, onsite stormwater retention pond and replace with an underground stormwater holding tank (cistern).
- Relocate the existing, southern-most gate along S. George Mason Drive north by approximately 50 feet. The existing location of the southern gate conflicts with the footprint of the new building. In order to provide required AT/FP clearances, and to permit access for fire trucks and service vehicles, the southern gate needs to be relocated to the north. The relocated gate would be used as an emergency exit from the existing Southwest Parking Garage. This gate is also anticipated to be used as a VIP entry by senior ARNG staff when they visit the site, which is not expected to occur more than three times per week.
- Remove approximately 400 to 450 cubic yards of petroleum-contaminated soil per the recommendations of, and in consultation with, the Virginia Department of Environmental Quality (VDEQ).
- Relocate the existing, onsite radio tower to the north, adjacent to the East Parking Garage.

- Implement stormwater and soil erosion management controls in accordance with applicable Federal and state laws. This would control erosion and sedimentation during construction activities.
- Comply with applicable Arlington County Noise Ordinances during on-site construction activities to minimize noise impacts to neighboring properties and to ARNGRC Staff.
- Comply with the Chesapeake Bay Preservation Ordinance to provide adequate replacement of tree canopy coverage at the site (removed through installation of the E Garage Addition) over the life of the project. The ARNG would work with Arlington County to ensure the requirements of this Ordinance are met to replace trees lost to construction. The ARNG would plant trees in retained landscaped areas, over the plaza, and along ARNGRC boundaries. The ARNG would monitor trees to ensure successful establishment. The ARNG would complete, submit, and have approved by Arlington County, a Landscape Conservation Plan that addresses these elements.
- Review the potential to install a traffic signal at the intersection of the ARNGRC Site Access Road (Main Gate) and S. George Mason Road, working with Arlington County.
- Secure NCPC review and approval of the Transportation Management Plan (TMP; **Appendix D**), submitted as part of the ARNGRC Master Plan. Per the requirements of the NCPC, a full range of transportation options to address traffic concerns associated with the realigned personnel have been evaluated in the ARNG's TMP. A TMP is required by NCPC for any project that will increase the employment level on a worksite by more than 500 employees (including existing and proposed employees). The ARNG currently is coordinating with Arlington County to ensure that the TMP conforms to Arlington County's Transportation Demand Management (TDM) policy. The ARNG is committed to implementing the TMP measures (including the TDM Strategies described in the TMP) needed to mitigate potential traffic impacts of this Proposed Action to less-than-significant levels.
- Implement an adaptive management strategy to ensure traffic and parking impacts of the Proposed Action are maintained at less-than-significant levels. This includes implementing the TMP, including an appropriate combination of the TDM strategies identified therein. This flexible approach allows the ARNG to implement a variety of methods, using the "plan, implement, check, act" cycle to minimize this impact. However, this approach requires that the ARNG achieve the Modal Split¹ Objectives set forth in the TMP each year. The achievement of annual Modal Split Objectives would be monitored by the ARNG using the methods outlined in the TMP. Achievement of these Objectives would reduce identified significant adverse project impacts to less-than-significant levels.
- Implement Best Management Practices (BMPs) to minimize effects to land use, air quality, noise, soils, water resources, biological resources, cultural resources, stormwater management, transportation, and hazardous materials/wastes.

Construction would begin in FY 2009 and must be completed by 15 September 2011 in accordance with BRAC Law, initiated once this NEPA process is complete. The ARNG would ensure that any required permits, approvals, or certifications are obtained prior to initiating construction activities.

Alternatives

¹ "Modal Split" is a common term used by transportation engineers that refers to the percentage of workers using a given means of transportation to and from a particular site, such as Single Occupant Vehicle (SOV), public transportation, and walking.

Multiple alternatives initially were considered by the ARNG early in the project planning phases. However, due to the unwillingness of the State Department to allow access to or co-use of their George P. Schultz National Foreign Affairs Training Center (NFATC), located adjacent and to the east of the ARNGRC, as well as the US Air Force's denial of the ARNG's request for land acquisition at Andrews AFB, the ARNG's options were substantially narrowed. In order to comply with BRAC Law within the timeframe required (by 15 September 2011), the only remaining alternative was to relocate the 1,200 JP-1 Staff to the ARNGRC. Leasing local commercial space is contrary to the 2005 BRAC recommendations (and therefore not feasible), as is acquisition of new land elsewhere in the vicinity. Consequently, two alternatives were considered in detail by the ARNG in this EA:

- Preferred Action Alternative - The Preferred Action Alternative would expand the ARNGRC as described above.
- No Action Alternative - Under the No Action Alternative, the 1,200 JP-1 Staff would not be moved to the ARNGRC and the ARNGRC would not be expanded. The No Action Alternative would not address the purpose of and need for the Proposed Action (i.e., would not comply with BRAC Law). However, inclusion of the No Action Alternative serves as a benchmark for evaluation of the potential effects of the Preferred Action Alternative.

Environmental Consequences

Implementation of the Preferred Action Alternative, representing the ARNG's compliance with BRAC Law, would result in the impacts identified throughout **Section 5.0** of the EA.

The Preferred Action Alternative, without mitigation, would result in significant, long-term adverse traffic and offsite parking impacts. These are the only potential significant adverse impacts of the Preferred Action Alternative identified within this EA's analysis. With the ARNG's successful implementation of the Mitigation Measure described in this EA (see **Section 5.12.5.2**), these impacts would be reduced to less-than-significant levels. This Mitigation Measure requires the ARNG's annual attainment of the Modal Split Objectives described in the TMP, as demonstrated via monitoring by the ARNG. The results of this monitoring will be summarized by the ARNG in an annual report, completed by 15 November of each year. This report will be available, upon written request to the NGB Public Affairs Office, to the NCPC and any other interested parties.

Other impacts from the Preferred Action Alternative include potential minor adverse impacts to land use (removal of mature trees and the height of the proposed structure), air quality (during construction), the local noise environment (during construction), biological resources (removal of mature trees), stormwater management (during construction and through removal of the stormwater retention pond and replacement with underground storage facilities), transportation (during construction and national emergency situations), and Hazardous and Toxic Materials and Wastes (HTMW; remediation of a small, onsite petroleum-contaminated area during construction). All of these impacts are less than significant. The ARNG has consulted with the VDEQ concerning the required onsite soil remediation, and concurred with VDEQ's recommendations (see **Appendix A**).

With the ARNG's implementation of the BMPs and compliance with the regulatory requirements as described in this EA, these minor impacts would be further reduced (please see **Section 5.16** for a summary of these BMPs). No adverse impacts to cultural resources, prime or unique farmland, wild or scenic rivers, threatened or endangered species, jurisdictional wetlands, coastal zone management, Protection of Children, or Environmental Justice would occur. The Preferred Action Alternative would not contribute to significant adverse cumulative impacts within its region of influence, provided the BMPs and Mitigation Measure are implemented.

Implementation of the No Action Alternative would not result in any significant adverse impacts. However, for the No Action Alternative, this EA recommends transportation improvements based on the results of the Transportation Impact Analysis (TIA; **Appendix C**). The TIA identifies existing traffic deficiencies in the area of the ARNGRC that would worsen over time, even under the No Action Alternative. The EA describes recommended improvements to: George Mason Drive/Arlington Boulevard (US Route 50), S. George Mason Drive/ARNGRC Site Access A, and S. George Mason Drive/6th Street.

The No Action Alternative was not found to satisfy the purpose of and need for the project. This alternative would fail to achieve AT/FP requirements, would neither increase overall efficiency nor reduce operating costs through consolidation and realignment, and would not implement the BRAC Commission recommendations, thus violating BRAC Law.

Mitigation Requirements (Preferred Action Alternative)

One Mitigation Measure is required for implementation of the Preferred Action Alternative. This Mitigation Measure would reduce the Preferred Action Alternative's identified significant, long-term adverse traffic and parking impacts to less-than-significant levels. This Mitigation Measure requires the ARNG's annual attainment of the Modal Split Objectives described in the TMP, as demonstrated via monitoring by the ARNG. The results of this monitoring will be summarized by the ARNG in an annual report, completed by 15 November of each year. This report will be available, upon written request to the NGB Public Affairs Office, to the NCPC and any other interested parties. This Mitigation Measure, described in detail in **Section 5.12.5.2** of this EA, includes implementing direct shuttle service between the ARNGRC and the Ballston Metrorail Station by the 2nd quarter of FY 2009; direct shuttle service between the ARNGRC and the Crystal City Virginia Railway Express (VRE) and Metrorail stops and the Pentagon by the 4th quarter of FY 2009; an electronic slug line; and increased carpool/vanpool use, among other methods. These methods, working in combination, are designed to reduce Single Occupant Vehicle (SOV) trips to/from the ARNGRC (to a level at or below the current total level) to meet Modal Split Objectives and, therefore, reduce traffic and parking impacts.

This Mitigation Measure is reasonable and attainable based, in part, on the "transit-favorable modal bias" demonstrated through a survey of proposed future ARNGRC Staff. This survey was conducted as part of the TMP (see **Appendix D**). In common terms, this means that the survey identified that a majority of the 2,500 Staff involved in the Proposed Action would be willing (or would prefer) alternative means, other than SOV trips, of commuting to the ARNGRC, provided the alternative means were convenient, accessible, and allowed for appropriate flexibility in work hours. Implementation of the TMP would provide such alternative means, as described in the EA and the TMP.

With the ARNG's successful implementation of this Mitigation Measure, these impacts would be reduced to less-than-significant levels. With the ARNG's implementation of the BMPs and compliance with the regulatory requirements as described in this EA, all identified minor impacts would be further reduced. **Section 5.16** provides a summary of these BMPs.

Conclusions

The evaluation performed within this EA concludes that there would be no significant adverse impact, either individually or cumulatively, to the local environment or quality of life as a result of the implementation of the Preferred Action Alternative, provided that the Mitigation Measure and BMPs specified in this EA are implemented and regulatory compliance is achieved. The analysis determines, then, that an EIS is unnecessary for implementation of the Preferred Action Alternative, and that a FNSI is appropriate. This EA recommends implementation of the Preferred Action Alternative. Implementation of the Preferred Action Alternative would serve to fulfill the purpose of and need for the Proposed Action.

Regulations

The Proposed Action will not violate NEPA, the CEQ Regulations, 32 CFR Part 651, or any other Federal, state, or local environmental regulations.

Commitment to Implementation

The NGB and ARNG affirm their commitment to implement this EA in accordance with NEPA. Implementation is dependent upon funding. The ARNG and the NGB's Facilities, Environmental Programs, Training, and Installation Divisions will ensure that adequate funds are requested in future years' budgets to achieve the goals and objectives set forth in this EA, including achievement of the Mitigation Measure and BMPs as described.

Public Review and Comment

Public participation with respect to decision-making on the Proposed Action is guided by 32 CFR Part 651. The Final EA and Draft Finding of No Significant Impact (Draft FNSI) are being made available to the public for comment for a period of 15 days. The Final EA and Draft FNSI have been announced in *The Connection* newspaper and made available to the public at local libraries (Arlington Central and Columbia Pike Branch). In addition, the documents are available at: <http://www.ngb.army.mil/features/ENV/default.aspx>.

At the end of the 15-day period, the ARNG will consider all comments submitted by individuals, agencies, and organizations. As appropriate, the ARNG may then execute the FNSI and proceed with implementation of the Proposed Action. Throughout this process, the public may obtain information on the status and progress of the Proposed Action and the EA from *Ms. Margaret Moffett, NGB Public Affairs, ATTN: NGB-PA, 1411 Jefferson Davis Highway, Arlington, VA 22202-3231; Telephone: (703) 607-2614.*

Agencies consulted during the preparation of this EA include: the U.S. Fish and Wildlife Service (USFWS), U.S. Army Corps of Engineers (USACE), Virginia Department of Environmental Quality (VDEQ), Virginia Department of Conservation and Recreation (DCR), U.S. Department of Agriculture - Natural Resources Conservation Service (NRCS), the Virginia State Historic Preservation Officer (VA SHPO), Virginia Department of Transportation (VDOT), and Arlington County representatives. Copies of correspondence are provided in **Appendix A**. Agency information and comments have been incorporated into this EA.

The ARNG determined that no federally recognized Native American tribes have ancestral ties to the project area. As such, consultation with federally recognized Native American tribes as required under the Annotated DoD Policy on American Indians and Alaska Natives (dated 27 October 1999), Executive Order (EO) 13175, and Army Regulation (AR) 200-1, was not required.

The Draft EA was made available for public review and comment from 4 March through 4 April 2008. During the public review of the Draft EA, a public meeting was held on 11 March 2008 at the Masonic Lodge on S. George Mason Drive. The public meeting was advertised in *The Connection* (local) newspaper. The ARNG received 26 public comments on the Draft EA, focused primarily on traffic and parking issues. These comments are located in **Appendix A**; the Final EA has considered and responded to these comments.