

4 April 2008

Ms. Peg Moffett
National Guard Bureau
Office of Public Affairs and Strategic Communications
1411 Jefferson Davis Highway, Suite 11200
Arlington, VA 22202-3231

Re: Environmental Assessment(EA) for the proposed addition to the National Guard Bureau-Army National Guard (NGB-ARNG) Headquarters building adjacent to the existing Arlington Hall ARNG Readiness Center, Arlington, Virginia.

Dear Ms Moffett:

This letter is written in response to the invitation to provide public comment to the proposed construction of an addition to the existing Arlington ARNG Readiness Center in Arlington, Virginia. This construction is necessary to implement the 2005 Base Realignment and Closure Commission (BRAC) recommendations. The following comments delineate the concerns of the Alcova Heights Citizens Association and the Barcroft School and Civic League (BSCL), the civic associations that represent the neighborhoods located immediately to the south and west of the National Guard Bureau's proposed actions.

Overview

The Alcova Heights and Barcroft communities do not oppose the expansion of the Army National Guard Readiness Center. However, the expansion must be done properly to minimize the impact on the surrounding community. As planned, we believe that there will be significant impacts on the community that are not properly addressed in the

environmental assessment. Until funding can be provided that will allow the parking garage to be completed in time for the opening of the new building, this project should not proceed.

Background

The major impact is the new building construction that will bring 1200 employees to the installation in 2011, people now working at a Crystal City location. The Transportation Management Plan (TMP) cites that 56% or 672 of these employees rely on mass transit to get to and from work and that 29.5% or 354 of the employees currently drive their own cars. The project proposes construction of a new garage which will provide parking for 488 employees but is not yet funded and may not be built or completed until 2014, three years after the transfer is to take place. While Crystal City is close to a varied and strong mass transit program, the Readiness Center is located in an area that is termed “under-served” by public transportation.

Public Transportation

The need for a strong and decisive public transportation program seems critical if the transfer of these 1200 employees is to work. It is the strong belief of the Alcovia Heights and Barcroft communities that increased shuttle bus service, with clearly defined numbers and frequency of buses between key Metro stations such as Ballston and Crystal City to the site will be needed. However, it is not clear that adequate funding will be made available for these or any increased services.

Beyond the question of resources for public transportation, it is not clear where the employees who currently drive to work will park. The number of current drivers is substantial, and generally people who drive will want to keep driving unless there is a strong incentive to change that behavior. While the TMP has some suggested approaches (car and vanpools, etc.), there is no data to confirm these drivers would be willing to change their transportation mode.

Inadequate Parking in the 2011-2015 Timeframe

While a new parking garage is envisioned for the expanded Guard facility, there is an interim problem because military construction funds have yet to be committed for the new parking structure. The analysis assumes funding will be made available (a tough assumption in this budget environment). In the best of circumstances, there will be a gap, and in those years the parking shortage could well affect the Alcova Heights and Barcroft neighborhoods in an adverse way. This analysis is informed by current experience, as NGB employees are currently forced to park on Alcova Heights and Barcroft's neighborhood streets.

The BSCL suggests that the EA needs to be more forthcoming on this issue, and more explicitly identify these adverse impacts in the interim period driven by scarce construction resources. Alcova Heights and Barcroft residents do not want to move into an Arlington County Parking Permit mode which is an unfair financial and logistics burden on them.

Conclusions

In conclusion, we find the EA to be flawed. The potential impacts of the proposed facility on the surrounding area are not adequately assessed. Moreover, effective and realistic mitigation measures are not identified. We have the sense that the Army National Guard relies on the TMP to address the interim absence of funding for a new garage by providing the appearance of a "solution" for getting through the period between when the building opens and the garage is constructed. It won't work, but the TMP and EA assumes that it will. At the same time, the EA makes a case for having to have a garage at all. Of course, if the TMP really were sufficient, there wouldn't be a need for a garage, but the Army National Guard wants to have it - and knows that in reality it must have it.

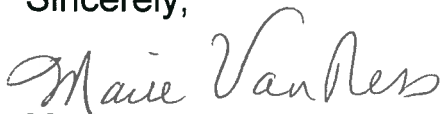
This project should not move forward until funding is provided for the garage. Our communities undoubtedly will be heavily impacted by the lack of parking and heavily congested roads, as they already are today. Given the difficulty that DOD has had in acquiring funding for its BRAC needs, we are very concerned that funding for the garage might not be achieved in the timeframe currently contemplated and that the impacts could be felt for many years to come. That is simply unacceptable.

Please see the attached a list of specific comments on the proposed Environmental Assessment. In broad terms, Alcova Heights and Barcroft recommend the following changes to the analysis/plans:

1. Better define public transportation services - number and frequency of buses – from major Metro Centers. Identify clear funding resources for these services.
2. Secure military construction funding for the proposed garage so that it coincides with the transfer of staff from Crystal City.
3. Include a clear reference to the need for better coordination between the Army and State Department to mitigate the adverse impacts of both of their projects, as required by law.
4. Designate a NGB POC for both the Alcova Heights and Barcroft neighborhoods to deal with traffic/commuting problems.

We are available to work with you to discuss or clarify any of our concerns.

Sincerely,



Marie Van Ness
President
Alcova Heights Citizens Association



Heidi Wicker
President
Barcroft School and
Civic League

Attachment

CC Members, Arlington County Board
Rep James Moran
Senator John Warner
Senator James Webb

ATTACHMENT

Specific Comments on the Proposed Environmental Assessment

1. The proposed Transportation Management Plan is overly optimistic at best. As the EA points out, this is a suburban location in a residential area. It is 1.5 miles from the nearest Metrorail station and 3.5 miles from the nearest VRE rail station. While the site is on a Metrobus route, the existing service is limited and not at all adequate to moving approximately 1200 employees during the morning and evening rush hours.
2. Neither the EA nor the TMP specify what level of bus service would be required to adequately serve the site. Nor do they address the cost of providing such service and who would be responsible for covering those costs.
3. The TMP sets a goal of having 8.6% of the employees arrive via Single Occupancy Vehicles. Currently 69% of the current occupants at the ARNGRC site commute via SOV. To achieve the goal of 8.6%, there would have to be an 87% reduction from the existing condition. Even at JP-1 where the site is conveniently served by Metrorail and VRE service, 30% of the commuting trips are by SOVs.
4. The EA fails to address the likelihood of such aggressive TMP goals being met at this suburban location. It provides no evidence of similar sites achieving the modal splits envisioned. Given the information provided about the modal splits for JP-1, we are skeptical that sites convenient to Metrorail have even achieved goals of this magnitude.
5. The EA fails to address the issues inherent in commuting by public transportation to Arlington Hall. JP-1 commuters would be faced with much longer commutes than they currently experience by public transit. There would be at least one more leg added to their commutes. Transportation studies have repeatedly shown that use of public transportation decreases when commuters must change trains, buses, etc. As public transportation becomes less convenient and more time consuming, commuters opt for other modes of transportation. None of this is contemplated in the EA.
6. Also, only 7% of the current occupants at the ARNGRC use public transit. The TMP assumes that 46.9% of all occupants will do so.

Is a 700% increase in the use of public transit realistic given the suburban location with limited bus service? Only 56% of the employees use mass transit to commute to JP-1 which has a very favorable location next to a Metro station and a VRE station.

7. There's a reference in the EA TMP noting that "contracted shuttle service is included (to) capitalize on the high percentage of transit riders from the JP-1 facility by filling gaps in public transit programs, if necessary." There's no reference to the cost of such a service or the likelihood of the federal government providing such funding.
8. The EA concludes that the implementation of the TMP will minimize the impact on traffic to the point where road improvements would not be necessary. Given our skepticism about the validity of the TMP, we believe that this will not be the case and that road improvements will be required. How will these be funded?
9. As required by CEQ Regulations (40 CFR 1508.7) the Army National Guard is required to consider the "incremental impact of an action when added to other past, present and reasonably foreseeable future actions, regardless of who undertakes these other actions." There are a number of nearby actions that are addressed in the EA. The most significant is the proposed construction of a new 160,000 square foot building by the State Dept on the NFATC that would house an additional 1,000 employees. Unfortunately, the EA is vague about the cumulative impact of these other projects and seems to disregard any potential impact. However there is a lack of any real analysis of the impact of this other Federal project. In fact with very little information provided about that project, it's difficult to understand how any significant analysis could be done. As such, we believe that the Army National Guard has not met the requirements of 40 CFR 1508.7.
10. We are very concerned by the lack of funding for the proposed garage to serve the new building and the plan to start construction of the garage three years after the new building is set to open. Parking for the site currently overflows onto adjoining streets and adjoining properties. It's completely unrealistic to think that 1200 additional employees can be housed on the site without any increase in parking for a minimum of four years after the building opens.