

**Appendix K**  
**Responses to Comments on the 2012 Draft EIS**

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## APPROACH TO COMMENT AND RESPONSE PRESENTATION

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Pursuant to guidelines of the Council on Environmental Quality (CEQ) for implementing the National Environmental Policy Act (NEPA), the U.S. General Services Administration (GSA) as the lead agency of this Environmental Impact Statement (EIS) provides responses to comments received during the public comment period of the Draft EIS (October 26, 2012 to December 10, 2012). When appropriate, GSA has added clarifying information in the main text of the Supplemental Draft EIS to further respond to comments. The approach to the presentation of the comments received and responses provided is summarized as follows:

- Appendix K is a separate appendix of the Supplemental Draft EIS where all comments received and GSA responses are located.
- Appendix K begins with a table that lists all commenters by category. Commenters on the Draft EIS include federal agencies, Commonwealth of Virginia agencies, local agencies and officials, and individuals.
- Comments received are grouped by the respective commenter. When a commenter used more than one method to make comments, all methods (letter, email, or on a comment sheet at the public meeting) are provided and grouped together under the same commenter.

Each commenter's statement is given a number and letter. The statements are bracketed according to individual topic or point of discussion. These brackets are illustrated on each commenter's statement and given an alpha-numeric code. The code consists of a letter indicating the group of the commenter (F is federal agency, T is Tribe, C is Commonwealth agency, L is local official or agency, and I is for Individual); and a number for the commenter followed by a letter indicating a particular comment. (e.g., F1 is federal agency commenter; F1-A is that commenters first comment). Each of the bracketed comments has a corresponding response in the response column.

The intent of the responses is to directly address the comments. Where comments were considered to be opinions or suggestions of the commenter and a detailed response is not required, the response "comment noted" is given. Where comments are re-stating elements of the Draft EIS, they are considered to be for informational purposes and do not require a response. Such comments are not given a bracket or code. Responses provided to similar comments are cross-referenced to avoid extensive duplication. In general, the comments that are addressed first (e.g., agencies) have more extensive responses and similar comments that appear later in the appendix are referred to the earlier response of another commenter (e.g., Refer to response F1-B). Where applicable, responses provide the reader with a reference to a section of the Supplemental Draft EIS for more detail, or to a section of the Supplemental Draft EIS that has been revised.

**COMMENT INDEX**

<b>Commenter by Category</b> (Note: All written comments are grouped by commenter)	<b>Comment Number</b>	<b>Page Number</b>
<b>Federal Agencies</b>		
Army Corps of Engineers	F1	K-4
U.S. Environmental Protection Agency	F2	K-7
U.S. Department of Interior	F3	K-20
<b>State Agencies</b>		
Commonwealth of Virginia Department of Transportation	C1	K-22
Commonwealth of Virginia: Department of Environmental Quality Department of Game and Inland Fisheries Department of Conservation and Recreation Department of Historic Resources Department of Health Department of Forestry Marine Resources Commission Department of Aviation Nottoway County Prince Edward County Lunenburg County Crater Planning District Commission Richmond Regional Planning District Commission	C2	K-28
<b>Tribes</b>		
Eastern Band of Cherokee	T1	K-81
Tuscarora Nation	T2	K-82
<b>Local Officials and Agencies</b>		
Lunenburg County	L1	K-84
Mecklenburg County	L2	K-85
Nottoway County	L3	K-86
Town of Crewe	L4	K-87
Downtown Blackstone Inc.	L5	K-88
City of Emporia	L6	K-89
<b>Individuals</b>		
Abbot	I1	K-90
Coleburn	I2	K-93

Duncanson	13	K-94
Glancy	14	K-95
Hasbrouk	15	K-96
Public	16	K-97

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## **FEDERAL AGENCIES**

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**Draft EIS comments (UNCLASSIFIED)**

**Hamilton, Julie S NAO** <Julie.S.Hamilton@usace.army.mil> Thu, Nov 8, 2012 at 3:56 PM  
To: "FASTC.info@gsa.gov" <FASTC.info@gsa.gov>

Classification: UNCLASSIFIED  
Caveats: NONE

Please see attached.

Julie S. Hamilton  
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(Email correspondence may be subject to FOIA)  
Look Deep into nature, and then you will understand everything better. --Albert Einstein

The Norfolk District is committed to providing the highest level of support to the public. In order for us to better serve you, we would appreciate you completing our Customer Satisfaction Survey located at <http://per2.nwp.usace.army.mil/survey.html>. We value your comments and appreciate your taking the time to complete the survey.

Classification: UNCLASSIFIED  
Caveats: NONE

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 **Comment Matrix FASTC Draft EIS 10-26-2012.pdf**  
20K

**GSA Response**

No response necessary on this page.

*Comment/Response Matrix*  
**Draft Environmental Impact Statement for**  
**Foreign Affairs Security Training Center**  
**Nottoway County, Virginia**  
**October 26, 2012**

Reviewer	Comment	
Julie Hamilton-USACE	Please show wetland and stream impact maps with more details. Possibly, by parcel to better evaluate avoidance and minimization on-site.	F1-A
	Please show where the 100 ft buffers around streams and wetlands will be less than 100 ft.	F1-B
	It is preferred that the remaining wetlands and streams that are not impacted be deed restricted to protect them in perpetuity.	F1-C
	Please describe what areas of wetlands will be cleared. How will they be cleared? Will they be grubbed or will the stumps remain in place? Are these areas going to be converted from forested wetlands to scrub shrub or emergent wetlands? Please explain why they need to be cleared but no structure built?	F1-D
	It is preferred that stormwater does not directly outfall into streams and wetlands. It is preferred that level spreaders be utilized when stormwater outfalls come in close contact with wetlands. It is also preferred that stormwater culverts do not enter a stream perpendicularly but parallel to minimize impacts to the other side of the stream.	F1-E
	The use of LID methods are supported. How many areas will utilize these methods?	F1-F
	Please provide a map showing the location of the proposed potential on-site mitigation site within the ACUB. Has this site been disturbed in the past? Will this site mitigate for both wetlands and streams?	F1-G
	Please be aware road improvements outside of the 4 parcels that impact wetlands or streams may be considered a part of this project especially if they would not be constructed but for the FASTC project. Those impacts would be considered cumulative and would require compensatory mitigation.	F1-H
	Please be aware utilities that need to be improved or brought in for the project outside of the 4 parcels that cause impacts to wetlands or streams would also be considered part of this project if they would not be constructed but for the FASTC project. Those impacts would be considered cumulative and require compensatory mitigation.	F1-I

**GSA Response**

**F1-A**

Figures showing direct wetland impacts by parcel, and text discussing avoidance areas, have been added to Section 4.1.4 *Wetlands*.

**F1-B**

Wetland impact figures added to Section 4.1.4 (refer to Response F1-A) include the requested 100 foot buffers.

**F1-C**

Wetland and stream preservation would be addressed as part of the Section 404/401 Joint Permit Application.

**F1-D**

Clearing of vegetation in wetlands would be to provide appropriate clear zones, such as, for safety zones for vehicles on drive tracks. The mechanism for clearing and type of wetland that remains would be specified in the project design and would be addressed in detail as part of the Section 404/401 Joint Permit Application process.

**F1-E**

The design process would incorporate these practices to the extent feasible and would utilize all measures to reduce impacts.

**F1-F**

Low Impact Development (LID) methods would be utilized to the extent feasible in accordance with all applicable regulations and guidelines, including but not limited to Sec 438 of the Energy Independence and Security Act, state and local regulations, GSA sustainability guidelines, and Leadership in Energy and Environmental Design (LEED) design criteria. Design details would be provided as part of the Section 404/401 Joint Permit Application process.

**F1-G**

Mitigation bank credit availability letters would be obtained from all appropriate mitigation banks as part of the Section 404/401 Joint Permit Application process. The potential wetland mitigation bank in the Army Compatible Use Buffer (ACUB) has not yet been constructed. Should this potential site become available for use in the time period required for this project, details about the site would be incorporated in the permit application.

**F1-H**

There are no road improvements planned outside the Build Alternative 3 site.

**F1-I**

New utilities would be constructed in areas already disturbed along existing or planned roadways or utility corridors and would not impact additional areas (Refer to TableES-2, Section 4.2.8.1, and Table 6.16-1).

*Comment/Response Matrix*  
 Draft Environmental Impact Statement for  
 Foreign Affairs Security Training Center  
 Nottoway County, Virginia  
 October 26, 2012

Reviewer	Comment
	Please provide a large scale map of labeled wetlands with the acreage per polygon and the wetland type.
	Please provide a large scale map of labeled streams with linear feet per reach and the type of stream R4 or R3.
	Please provide a plan for stormwater.
	Please provide a plan for erosion and sediment control.
	To minimize impacts it is preferred to utilize existing roads that already have stream crossings.

F1-J

F1-K

F1-L

F1-M

F1-N

**GSA Response**

**F1-J**

Detailed mapping of wetland impacts would be developed during project design and provided as part of the Section 404/401 Joint Permit Application process.

**F1-K**

This information would be developed during project design and provided as part of the Section 404/401 Joint Permit Application process.

**F1-L**

Detailed mapping of stream impacts would be developed during project design and provided as part of the Section 404/401 Joint Permit Application process.

**F1-M**

The erosion and sediment control plan would be developed during project design and provided as part of the Section 404/401 Joint Permit Application process.

**F1-N**

The alternatives development process and the build alternatives of this EIS have incorporated existing roads and stream crossings where feasible. This wetland impact avoidance measure would be carried through to the design process. Additional opportunities for impact minimization would be considered during project design.



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

December 14, 2012

Ms. Abigail Low  
GSA Project Manager  
20 N 8<sup>th</sup> Street  
Philadelphia, PA 19107

Re: U.S. Department of State Bureau of Diplomatic Security, Foreign Affairs Security Training Center, Nottoway County, VA (CEQ No. 20120342)

Dear Ms. Low:

In accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act and the Council on Environmental Quality regulations implementing NEPA (40 CFR 1500-1508), the U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement (DEIS) for the U.S. Department of State Foreign Affairs Security Training Center in Nottoway County, Virginia.

The DEIS addresses the proposed development and operation of the Department of State (DOS) Foreign Affairs Security Training Center (FASTC) in Nottoway County Virginia, on land within and adjacent to the Army National Guard Maneuver Training Center Fort Pickett (Fort Pickett). The purpose and need for the proposed FASTC in Nottoway County is to consolidate existing dispersed training functions into a single suitable location to improve training efficiency and enhance training operations. The FASTC would include facilities for soft skills training, such as classrooms, simulation labs, and a fitness center; hard skills training, such as driving tracks, mock urban environments, and firing and explosives ranges; as well as administrative and life support facilities including administrative offices, dormitories, a dining hall, and emergency medical response services. It is anticipated that the facility will require approximately 1500 acres of property.

The DEIS summarizes the process followed in screening, study and selection of the proposed location at Fort Pickett. Fort Pickett encompasses approximately 45,000 acres, most of which were identified as no longer required by the U.S. Army by the 1995 Defense Base Closure and Realignment Commission. One hundred forty acres were identified as a U.S. Army Reserve enclave. The Virginia Army National Guard (VAARNG) has operational control over approximately 42,000 acres of Fort Pickett through a 1997 facility land use agreement and it is currently being used as a Maneuver Training Center. Approximately 2,950 acres were not needed for military uses and were deeded to Nottoway County in 2000 for use in the economic

**GSA Response**

No response necessary on this page.

development activities of the Local Redevelopment Authority (LRA). FASTC operations appear to have compatible and appropriate requirements for the excised property.

The DEIS evaluates two build alternatives, Alternative 1 and Alternative 2 (the Preferred Alternative), and the No Action Alternative. Under Build Alternative 1, training would occur at the site in hard and soft skills training facilities and life support facilities located on Parcel 21/20 off Dearing Road and LRA Parcel 9 off Military Road. Under Build Alternative 2, the facilities would be located on Parcel 21/20, LRA Parcel 9, and two additional parcels—the Grid Parcel and LRA Parcel 10. The major differences between Build Alternative 1 and Build Alternative 2 are the locations of the Main Campus, Mock Urban Environments, and three buildings of the High Speed Driving Track Area. Under Build Alternative 2, the Main Campus would be located on LRA Parcel 10 (instead of Parcel 21/20 in Alternative 1); the Mock Urban Environments would be located on LRA Parcel 9 and the Grid Parcel (instead of only LRA Parcel 9, for Alternative 1).

The proposed re-use of the Fort Pickett site for FASTC involves notable environmental impacts to the property for either Build Alternative 1 or 2. Impacts include 7.01 acres of wetlands (5.20 direct fill/1.81 indirect clearing) for Alternative 1 in addition to 27.56 acres of wetland buffer clearing; or for Alternative 2, 6.5 acres of wetlands (4.20 direct fill/2.30 indirect clearing) and approximately 22.01 acres of wetland buffer clearing. Alternative 1 would impact 1,205 linear feet of stream and Alternative 2 would impact 1,127 linear feet of stream. The net increase of impervious surface for Alternative 1 would be 214 acres and 225 acres of net increase for Alternative 2. Vegetation clearing for Alternative 1 would be 500 acres (460 forest; 40 shrub/grass) and Alternative 2 would impact 525 acres of vegetation (480 forest; 45 shrub/grass). GSA has identified Alternative 2 as the Preferred Alternative, which appears also to be the alternative which minimizes some critical environmental impacts.

EPA understands the purpose and need for the proposed action for the DOS FASTC. EPA appreciates the effort made by GSA to involve Federal agencies in the NEPA process, including allowing EPA to be a Cooperating Agency in development of this EIS. However, as a result of our review of the DEIS, EPA has some questions and concerns regarding impacts to vegetation, wetlands, threatened and endangered species, and noise. It is understood that establishment of a facility of this size is likely to result in some environmental damages. It is hoped that during more detailed planning, additional avoidance and minimization measures will be sought and implemented as allowed. EPA commends the effort made to find a suitable location for the FASTC. A detailed description of our questions/concerns is presented in the Technical Comments (enclosed) for your consideration. EPA rated the DEIS an EC-2 (Environmental Concerns/Insufficient Information), which indicates that we have environmental concerns regarding the proposal and that the study does not contain sufficient information to fully assess the environmental impacts that should be avoided by this project. A copy of the EPA's rating system is enclosed for your information.

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**GSA Response**

**F2-A**

Comments noted. Should the decision be made to move forward with the FASTC project, GSA would be committed to incorporating all feasible impact avoidance and minimization measures into the design, construction, and operation of the facility.

**F2-B**

Responses to the technical comments are provided below. EPA's rating of EC-2 is noted; however, please be advised that GSA has made every effort to include all pertinent information requested by EPA during the development of the Draft EIS. Additional information has been added to the Supplemental Draft EIS, where appropriate, to further address technical comments, as noted in responses below.

F2-A

F2-B

Thank you for providing EPA with the opportunity to review this project. If you have questions regarding these comments, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765.

Sincerely,



Barbara Rudnick  
NEPA Team Leader  
Office of Environmental Programs

Enclosure (2)

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**GSA Response**

No response necessary on this page.

**Technical Comments**

Groundwater/Surface Water

Page 3-19 references EBS-13 (within the LRA Parcel 9) as having an ongoing remedial action and monitoring program associated with the Former Recycling Compound, specifically the Paint Pit. "Land Use Controls [LUCs] are in place to protect against groundwater usage/contact until contaminant concentrations are brought into compliance with regulatory levels." The DEIS states, "In addition, a groundwater monitoring program is ongoing for the Trimble Road Landfill (adjacent to Parcel 21/20). Additional information on EBS-13 and landfill is provided in Section 3.15." There is no Section 3.15 in the DEIS; it is assumed, however, that the reference should be to Section 3.2.11.2.

F2-C

The areas discussed should be identified on a map (Figures 2.2-1 and 2.2-2). EPA appreciates that as stated on page 3-125, "The LUCs prohibit the disturbance of soils in a 4 acre portion of the site thereby blocking human exposure to contaminated groundwater. The LUCs also prevent exposure to materials potentially presenting an explosive hazard (MPPEH), which are also suspected to be in the area. Plans for development would need to be made consistent with these limitations." It is encouraged that the FASTC project be discussed with the remedial team to ensure that the proposed actions will not impede on remedial efforts or pose threats for contamination.

F2-D

Page 3-20 states in reference to Parcel 21/20, "According to the 2012 Virginia 305(b) list the waters of Birch Creek are classified as 3A. A 3A classification indicates that no data are available within the data window of the current assessment to determine if any designated use is attained and the water was not previously listed as impaired and is therefore considered to be unimpaired." Please clarify: will Birch Creek be assessed for baseline data so that information will be recorded for future assessment and/or monitoring of impact from FASTC activities?

F2-E

In reference to LRA Parcel 10, "None of the surface waters present on the LRA Parcel 10 are classified as impaired by DEQ. These waters are either unimpaired or have not been assessed." Will the surface waters on LRA Parcel 10 be assessed prior to project implementation?

F2-F

Threatened and Endangered Species

Page 4-15 states, "The USFWS has concurred with GSA's "no affect" determination with regards to Michaux's Sumac, Roanoke logperch, dwarf wedgemussel and bald eagle (Appendix C). Virginia agencies, Virginia Department of Game and Inland Fisheries and Department of Conservation and Recreation were provided GSA's assessment of effects with regard to state threatened and endangered species (Appendix C), but did not pursue an informal review." Appendix C provides a copy of the letter from the Department of Game and Inland Fisheries dated July 30, 2012 stating that they are unable to provide a review due to staffing limitations. EPA appreciates that Virginia agencies were given an opportunity to comment on the DEIS.

F2-G

(F2-G continued on next page.)

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**GSA Response**

**F2-C**

Section 3.1.4.2 has been revised to read, "Additional information on EBS-13 and the landfill is provided in Section 3.2.11.2."

**F2-D**

A figure has been added to Section 3.2.11.2 to identify the locations of the areas of concern. The Trimble Landfill has been excluded from the boundary of Parcel 21/20 and continued access for monitoring would be assured through a Land Use Permit with the Department of the Army that would be supplemented with a Memorandum of Agreement with the Virginia Army National Guard (VaARNG). Text addressing this has been added to Section 4.1.4.1. *Groundwater* in this Supplemental Draft EIS. GSA is currently pursuing documentation on the future regulatory status of the fence around the 18 acre portion of the site, as noted on page 3-125 of this Supplemental Draft EIS.

**F2-E**

Surface waters of the site will be assessed using the Unified Stream Methodology as required for the Section 401/404 Joint Permit Application for wetland impacts. Any water/stream quality data collected as part of that process would be shared with VDEQ for use as a baseline for monitoring impacts from FASTC activities. Because complex assessment of the quality of surface and ground waters, i.e., biological integrity, chemical, physical, habitat, and toxicity, as reported in the Virginia 305(b) list, is the responsibility of each state under the Clean Water Act, VDEQ Office of Water Quality Monitoring and Assessment was consulted regarding any future plans for assessment of the waters of this project site. VDEQ indicated that they do not have assessments planned for the waters of this project site. Therefore, the data provided in the 2012 Virginia 305(b) is the best available data for reference in this EIS. BMPs and stormwater management controls would be implemented to protect surface waters and avoid impacts during and after FASTC construction. Page 3-20 of the Supplemental Draft EIS has been revised for clarification.

**F2-F**

See response F2-E

**F2-G**

GSA agrees with EPA that state consultation is important. GSA held an agency scoping meeting with Commonwealth of Virginia agencies on October 11, 2011 in Richmond, Virginia for the Draft EIS and November 3, 2014 for the Supplement Draft EIS. GSA also consulted with Virginia agencies in correspondence dated July 16, 2012, early in the process of preparing the Draft EIS, which included detailed analysis of state and federal threatened and endangered species and specifically the results of a Michaux's sumac survey performed to support GSA's determination of no affect. Virginia agencies declined to participate in any consultation. All coordination letters with federal and state agencies and supporting documentation regarding federal and state threatened and (Response continued on following page.)

Because State consultation is important, it is worth pursuing input even if it means waiting for their review. In addition, it is important to include the most recent state and federal threatened and endangered species coordination letters within the FEIS. It is also recommended that the appropriate state and federal agencies be contacted annually regarding species of concern.

F2-G

**Noise**

Page 3-59 states, "Under enhanced propagation conditions ((Figure 3.2-2), the High Complaint Risk area (130 to 140 dB PK15 [met]) extends beyond the Fort Pickett boundary less than 2,950 feet (0.6 miles) at Ranges 15 and 16 and from the artillery firing points near the boundary. The Moderate Complaint Risk area (115 to 130 dB PK15 [met]) extends beyond the boundary in most directions up to 7,220 feet (1.4 miles)." In addition, "Under neutral propagation conditions (Figure 3.2-3), the High Complaint Risk area (130 to 140 dB PK50 [met]) remains within Fort Pickett except for small areas near Ranges 15 and 16 from the artillery firing points near the boundary. The Moderate Complaint Risk area (115 to 130 dB PK50 [met]) extends beyond the boundary less than 4,250 feet (0.8 miles). Ranges 15 and 16 should be clearly depicted on a map. It is important to note that this information is baseline although Figures 4.2-5 through 4.2-10 show baseline + build alternative noise contours. It would be helpful to have an overlay map showing baseline and build alternatives noise impacts to have a clearer image of impacts. Are there any mitigation measures that can be implemented in and around these areas to reduce noise impact?"

F2-H

Page 3-49 states, "Though the complaint risk guidelines would indicate a moderate to high risk of complaints, these areas are sparsely developed, and as such, the risk of complaints from off-post residences is low under the baseline scenario. Although these baseline contours do extend outside Fort Pickett in certain areas they do not extend beyond the ACUB."

F2-I

Page 4-35 states, "Complaint risk from residents in the surrounding community would still be expected to be low because of the existing acclimation to baseline noise from Fort Pickett munitions and aircraft operations, sparse residential development in that area, and the infrequency of peak events." Because this rationale is based on assumption, it would seem prudent to incorporate a periodic noise assessment to factor in a tolerance threshold. Although complaints are expected to be low, it is not known when the tolerance threshold would be surpassed. Please describe and document communication made to affected residences.

F2-J

The FEIS should quantify the number of residences, etc. that may be impacted in addition to identifying any sensitive resources (including schools, churches, etc.). Outreach to these affected areas should be made and appropriate mitigation, monitoring and adaptive management should be considered.

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**GSA Response**

**F2-G** (Response continued from previous page.)

endangered species were discussed in the Draft EIS and are included in Appendix C of the Draft and Supplemental Draft EIS. The 2012 correspondence has been updated in 2014 and added to Appendix C. The organization of Appendix C has been improved in the Supplemental Draft EIS to assist the reader in locating the relevant information. Should the proposed project move forward, GSA would continue to coordinate with the Commonwealth of Virginia. Also refer to responses to comments from Commonwealth of Virginia agencies regarding threatened and endangered species, C2-S through C2-Y. Since publication of the Draft EIS in 2012, the Northern long-eared bat has been proposed for listing under the federal Endangered Species Act. An analysis of this species and agency coordination has been added to the Supplemental Draft EIS.

**F2-H**

Section 3.2.3.4, *Baseline Complaint Risk Areas* on page 3-59 has been revised to replace "Ranges 15 and 16" with the directional information "northeastern, southeastern, and southern Fort Pickett boundary" to make it easier for the reader to find the areas being discussed.

Figures 4.2-5 through 4.2-10 do provide the requested overlay of the baseline and the build alternative noise contours. The baseline (dashed line) is shown with the proposed build alternative contours (solid line). The noise effects from the build alternative would be contained within, and would not exist in isolation from, the existing baseline, except in those areas shown between the dashed and solid lines. The proposed contours would only change the baseline in the area between where the baseline and the proposed (solid lines) extend (and are visible in the figure) beyond the baseline. This area represents the Build Alternative 3 impact area. Mitigation measures under consideration are the implementation of public notices prior to peak noise events (also refer to Table 6.15-1).

**F2-I**

DOS would consider notification of the community prior to the higher level noise events. Residents of the affected areas were notified directly about the Draft EIS and Public Information Meeting (as documented in Chapter 9). Public comments have not indicated any concerns about the effects of noise from FASTC. Statements made at the public information meeting by residents living near the proposed FASTC site indicated existing noise from aircraft is the most frequently noticed noise in the area and there was no concern about noise from the proposed project.

**F2-J**

A figure showing residences and other sensitive land uses has been added to Section 4.2.3 of the Supplemental Draft EIS. DOS would consider notification of the community prior to the higher level noise events. Also refer to Section 6.16 *Other Management Actions*.

**Hazardous Areas**

Page 3-119 states that there are three locations on Parcel 21/20 western boundary that show evidence of petroleum contamination based on laboratory analysis of soil samples. As the DEIS states, it is possible that residual gasoline contamination is present at some location along the pipeline on Parcel 21/20 and that a Phase II ESA recommends further investigation which GSA intends to conduct to determine if contamination is present. The area of potential impact should be depicted on a map in relation to proposed actions. Results of the Phase II ESA should be used in the planning of the proposed action. This is also recommended for the Grid Parcel in which investigations of the pipeline are to be conducted.

F2-K

Page 3-121 states that groundwater samples indicated contamination (elevated levels of bis(2-ethylhexyl)phthalate) at Building 767 (site identification PA-39). Where is this area on the Grid Parcel? What DOS action is proposed in or near this area?

F2-L

Page 3-122 states, "The Grid Parcel does not currently contain any structures." "Since it is likely that these structures contained LBP/ACM [Lead Based Paint/Asbestos-Containing Materials] and no documentation of their removal or disposal was available for review, site soils may contain these substances and present a Business Environmental Risk." Will soils in the Grid Parcel be tested for LBP/ACM contamination before implementation of the proposed action?

F2-M

Page 3-122 states that there could be a potential for radon levels on the Grid Parcel which may be above the USEPA Action Level. What follow-up action is proposed for testing and monitoring of radon within buildings?

F2-N

Page 3-124 states, "Three unlabeled 50-gallon drums were noted on the property at 507 Garnett Ave and were believed to contain soils associated with the environmental investigation conducted at site EBS-115. It is unknown if the contents of the drums would be classified as hazardous waste." Was the area where the drums were located (on LRA Parcel 9) assessed for potential contamination? Does there appear to be a need to sample the soils?

F2-O

Page 3-125 discusses the Former Fuel Station Site BCT-22. The DEIS states, "The continued presence of MTBE in MW-14 confirms that the BCT-22 plume has entered LRA Parcel 9. Without current downgradient sampling data, the extent of the plume is not known. However, since no groundwater wells or buildings are proposed in the areas downgradient of the plume, associated health risks are considered to be low." Are there land use controls in place? Will sampling be conducted? What steps are in place to ensure that the area is avoided to safeguard exposure?

F2-P

Page 3-126 states, "Building 1284 is currently located on LRA Parcel 9 (838 Garnett Ave) and no lead abatement information was obtained for this building." Does GSA plan to survey Building 1284 for LPB?

F2-Q

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**GSA Response**

**F2-K**

Figure 3.2-16, depicting potential sites of concern, has been added in Section 3.2.11 of the Supplemental Draft EIS. Phase II soil testing is not possible on Parcel 21/20 at this time. As noted in section 3.2.11, if contamination is encountered during construction it would be remediated on a case by case basis in accordance with all applicable laws. Results of additional Phase II investigations on the Grid Parcel have been incorporated into the Supplemental Draft EIS in Section 3.2.11.

**F2-L**

The PA-39 release area is located north and east of the Grid Parcel at a motor pool; it has been depicted on Figure 3.2-16 and added to Section 3.2.11 of the Supplemental Draft EIS. Section 3.2.11 of the Draft EIS indicated that further investigation would take place. This same section in the Supplemental Draft EIS indicates that these investigations have occurred and no contamination of groundwater was found.

**F2-M**

Soils on the Grid Parcel have been tested since the publication of the Draft EIS. The results are included in section 3.2.11 in the Supplemental Draft EIS.

**F2-N**

Facilities would be designed to prevent occupant exposures to radon above the EPA action level (4 pCi/L), in accordance with GSA Facilities Standards for Public Buildings (P100). This information has been added to Section 4.2.11 of the Supplemental Draft EIS.

**F2-O**

Section 3.2.11 of the Supplemental Draft EIS includes results of additional investigations, which indicate that these barrels have been removed and there is no longer any concern.

**F2-P**

There are no land use controls in place for BCT-22. VAARNG is responsible for monitoring the plume. Sampling of the existing wells has been conducted since publication of the Draft EIS, and results are included in section 3.2.11 of the Supplemental Draft EIS.

**F2-Q**

As indicated in section 4.2.11 of the Draft EIS and Supplemental Draft EIS, prior to demolition all buildings would be tested for LBP to determine disposal options and appropriate demolition safety measures.

Page 3-126 states, "Due to the history of LBP removal using sandblasting with no collection measures, LBP may be present in the soil under the tanks (Woodward-Clyde 1997)." Does GSA intend to survey the soils for LBP? Where are the three elevated water storage towers located on LRA Parcel 9 in relation to proposed project areas?

F2-R

Page 3-126 states, "Installation personnel indicated that removal of the debris subsequent to demolition may have been incomplete, and ACM may still be present in the soils in these areas. Asbestos is also known to be present on water main piping throughout the parcel (GSA 2010)." Does GSA plan to test soils for ACM?

F2-S

Page 3-127 states, "Because Nottoway County is classified by the USEPA as having a predicted average indoor radon screening level greater than 4 pCi/L, there is also potential for radon levels on Parcel 10 above the USEPA Action Level." As a result of the predicted radon screening levels, it would be prudent to test for radon once buildings are constructed. This should be stipulated and implemented upon building completion so that if needed remedial actions can be incorporated. Please state GSA's intention.

F2-T

Vegetation

Page 4-12 states, under Build Alternative 1 vegetation clearing would involve approximately 500 acres (460 forest; 40 shrub/grass) from Parcel 21/20 and LRA Parcel 9 for the construction of the FASTC facility. As for the Preferred Alternative, page 4-15 states that under Build Alternative 2, approximately 525 acres of land would be directly impacted by clearing on Parcel 21/20, the Grid Parcel, LRA Parcel 9 and LRA Parcel 10 for the construction of the FASTC facility. "Approximately 480 acres of forest and 45 acres of shrubland/grassland would be cleared from these parcels. Currently, approximately 1,335 acres on these parcels contain forestland and 105 acres contain grassland/shrubland. Therefore, the clearing associated with FASTC construction would eliminate approximately 36% of forestland and 43% of grassland/shrubland on these parcels with the greater impact being realized on LRA Parcel 9 and LRA Parcel 10."

The DEIS states that 33,892 acres of forest and 3,000 acres of grassland/shrubland are within Fort Pickett and 415 acres of forest surrounds and encompasses LRA Parcel 10. The Preferred Alternative would constitute an approximate loss of 1.4% of the forestland and 1.6% of the grassland/shrubland present within the surrounding area. Do these figures take into consideration future/cumulative projects presumed to impact terrestrial biological resources? As noted on page 5-17, "Insufficient details on each project are available to assess the total loss of habitat for all of the cumulative projects." Thus, it is difficult to fully assess impacts to forested areas and its impact on habitat, fragmentation, etc. Despite the percentage of clearing in comparison with the total remaining on Fort Pickett, every effort should be made to minimize impacts to forested areas and grassland/shrubland areas and to ensure that the FASTC in combination with future/cumulative projects does not have a compounded impact on vegetation

F2-U

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**GSA Response**

**F2-R**

As noted in section 3.2.11, only one of the water tanks is in the project area. Figures 2.2.1 and 2.2.2 show the existing water tower in relationship to the proposed action. It is located in the center portion of LRA Parcel 9 and would be surrounded by drive tracks upon completion of the FASTC. Draft EIS Section 4.2.11 noted that soils around the water tank would be tested. The soils around the water tank have since been tested and the results included in Section 3.2.11 of the Supplemental Draft EIS.

**F2-S**

Soils on LRA Parcel 9 have been tested. The results are included in Section 4.2.11 in the Supplemental Draft EIS.

**F2-T**

Please refer to response F2-N.

**F2-U**

Comments noted. Reducing impacts to vegetation has been a primary planning consideration in the development of the alternatives. Refer to Sections 2.2.2.2, 4.1.5.3, and 6.4.1 and Tables ES-2 and 6.16-1 for forest impact avoidance, minimization, and mitigation measures that would be incorporated into the design of the project to reduce project impacts to forest and other vegetation communities. As requested by EPA, the estimated acres planned for re-establishment of cleared vegetation has now been included in these sections of the Supplemental Draft EIS.

GSA would consider additional forest mitigation contingent upon availability of funding. There is no guarantee funding would be available to support the suggested mitigation plan options, but during facility design GSA would coordinate with Virginia Department of Forestry, incorporate all practicable measures to reduce long term forest impacts, and implement mitigation to the extent feasible.

resources and habitat. It is important to consider the beneficial value that forests have in relation to carbon uptake for Green House Gas (GHG) emissions and incorporate mitigation in the form of replanting trees to compensate for the quantity of trees lost due to construction and operation of FASTC. Forests have a valuable role in the ecosystem and habitat which should be properly mitigated for and addressed by GSA.

F2-U

The DEIS should provide a complete description of the terrestrial habitat resources in the study area. The composition and characteristics of each community type should be summarized and the functions and total acreage indicated. In addition, the species should be mapped relative to habitat locations and species density. Typically, an analysis of forest fragmentation associated with each alternative is provided to assess potential impacts on species.

F2-V

To determine the baseline value of the habitat and the severity of the potential impacts from the proposed project, EPA recommends that a baseline Habitat Evaluation Procedure (HEP) be completed on the study area using the U.S. Fish and Wildlife Service's Habitat Evaluation Procedure. If the impacts of the wildlife and terrestrial habitat are unavoidable, the HEP will help to determine the type of mitigation measures which would be considered appropriate for the potential impacts. EPA appreciates the mitigation proposed as outlined on page 6.2 (avoid disturbance when possible, treat disturbed edges, re-establish appropriate native plant communities, and connect plant communities across larger areas). However, the HEP will help to determine more effective mitigation appropriate for the study area. Because the direct vegetation impact is considerable, it would be advantageous to implement a more robust mitigation plan to compensate for vegetation loss.

F2-W

Wetlands

Page 4-8 states, "Under Build Alternative 1, direct impacts from the construction of the FASTC facility would result from filling of approximately 0.07 acres (0.17%) of wetlands on Parcel 21/20 and approximately 5.13 acres (10%) of wetlands on LRA Parcel 9. An additional 0.19 acres (0.46%) of wetlands would be indirectly impacted by clearing and conversion of forested wetland classified as palustrine forested (PFO) on Parcel 21/20 and approximately 1.62 acres (3.2%) on LRA Parcel 9." The DEIS also states that, "Build Alternative 1 would clear approximately 2.29 acres of the wetland buffer present on Parcel 21/20 and approximately 25.27 acres of the wetland buffer present on LRA Parcel 9."

Page 4-10 states, "Under Build Alternative 2, the construction of the FASTC facility would have direct fill impacts on wetlands of approximately 0.06 acres (0.15%) of wetlands on Parcel 21/20; 0.062 acres (4%) of wetlands on the Grid Parcel and 4.08 acres (8%) of wetlands on LRA Parcel 9." In addition, "Clearing would indirectly impact an additional 2.25 acres (4.5%) of wetlands on LRA Parcel 9 and 0.05 acres (0.3%) of wetlands on LRA Parcel 10. Wetland clearing would not be required on Parcel 21/20 or the Grid Parcel." The DEIS states, that "Build Alternative 2 would directly impact approximately 0.41 acres of wetland buffer on

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**GSA Response**

**F2-U**

(Response on previous page.)

**F2-V**

Vegetation communities, habitat types, and forest blocks present on each study area parcel are described in Section 3.1.5.1 and Figure 3.1.6 of the Draft and Supplemental Draft EIS. The study area parcels are also compared with habitat found within Fort Pickett overall. Wildlife present on each parcel within the various habitats of the study areas is described in Section 3.1.5.2, and a comprehensive list of wildlife confirmed or presumed to be present in the study areas, is included in Appendix D. Impacts to vegetation and wildlife, as well as forest fragmentation, are analyzed for each alternative in Section 4.1.5.1 of the Draft and Supplemental Draft EIS.

**F2-W**

Habitat and wildlife within Fort Pickett have been evaluated through various habitat and wildlife studies, as documented in the Fort Pickett Integrated National Resources Management Plan (VaARNG 2007). These studies, along with field investigations conducted in 2012 for the Draft EIS, provide a sufficient habitat baseline for the study area to evaluate impacts. Further, the USFWS HEP was not requested by USFWS. The EIS preparers have not identified data gaps that would justify additional, costly studies to determine impacts of the proposed project. Also refer to Response F2-U regarding mitigation.

<p style="text-align: center;">6</p> <p>Parcel 21/20; 1.26 acres of wetland buffer on the Grid Parcel; 19.2 acres of wetland buffer on LRA Parcel 9; and 1.14 acres of wetland buffer on LRA Parcel 10 from clearing.” As the DEIS states, GSA would obtain a permit for wetlands and stream impacts from USACE under CWA Sections 404 and 401, which would require full mitigation of impacts.</p> <p>EPA appreciates effort to further avoid and minimize impacts to aquatic resources and buffers as more detailed plans are developed. As GSA understands, the resources have important functions in the ecosystem and for water quality. Compensatory mitigation is often not required for buffers which are lost. Consideration of voluntary preservation of buffers, enhancement or establishment of buffers to protect existing or replacement wetlands could be evaluated.</p> <p>Unavoidable wetlands and stream impacts under Alternative 1 or 2 would be mitigated via one or more of the three proposed mitigation options: (1) purchase mitigation credits from an approved wetlands and stream mitigation bank within the Nottoway River watershed; (2) in lieu fee payment to the Virginia Aquatic Resources Trust Fund managed by the Nature Conservancy; and/or (3) purchase of mitigation credits from the ARNG Maneuver Training Center Fort Pickett located in the Army Compatible Use Buffer area. EPA questions the third mitigation option and requests additional information as to the bank to be used for purchasing mitigation credits. EPA would like to emphasize that the mitigation should be located in the service area to replace lost functions and values in the watershed. If GSA plans to use a bank, please show that the bank has the appropriate number and resource type credits available.</p> <p><b><u>Environmental Justice</u></b></p> <p>Page 3-83 states, “Environmental justice is achieved if minority and low-income communities are not subjected to disproportionately high or adverse environmental effects. The environmental justice analysis addresses the characteristics of race, ethnicity and low income status for populations residing in areas potentially affected by implementation of the Proposed Action.” While it is true that a major part of the goal of Environmental Justice is to assure that minority and/or low-income populations are not exposed to disproportionately high or adverse environmental impacts, it is also import to recognize that those populations need to be meaningfully involved in decision making, that these populations have access to information, are able to participate in a timely and appropriate manner, and that their comments and concerns are heard and given appropriate consideration during the process. The goal of the Environmental Justice assessment is to accurately identify the populations of potential Environmental Justice concern, and to use that information to determine if there may be any potentially disproportionate or adverse impacts that may impact those populations. The assessment is also conducted to assure that populations of concern are able to participate in an appropriate manner, and that they are able to express their concerns, receive information, and participate in decision making in a way that is meaningful and appropriate.</p> <p><small>Printed on 100% recycled/recyclable paper with 100% post-consumer fiber and process chlorine free. Customer Service Hotline: 1-800-438-2474</small></p>	<p><b>GSA Response</b></p> <p><b>F2-X</b></p> <p>Impact avoidance and minimization measures incorporated into the development of the alternatives include maintaining the 100-foot buffer along streams and wetlands wherever feasible. This goal was noted in Sections 3.1.4.4, 4.1.4.1, and 4.1.4.2 <i>Wetlands</i> of the Draft EIS. Additional text has also been added to Sections 2.2.3.2, 2.2.3.3, 6.3, and Tables ES-2 and 6.15-1 of this Supplemental Draft EIS.</p> <p><b>F2-Y</b></p> <p>GSA would secure letters of availability of mitigation credits from all appropriate mitigation banks during the Section 404/401 Joint Permit Application process. Preliminary inquiries made to wetland mitigation banks in the service area indicated that mitigation bank credits would be available for the project. Mitigation option (3) was noted as a potential mitigation bank if it becomes available. Mitigation option (3) has been revised in this Supplemental Draft EIS to clarify that the potential mitigation bank in the Fort Pickett ACUB is “...under consideration by ARNG within the Nottoway River watershed portion of the ACUB.”</p> <p><b>F2-Z</b></p> <p>The environmental justice analysis has been conducted for the Draft and Supplemental Draft EIS in accord with the noted principles. Extensive public outreach has occurred in the area since September 2011. As noted in Section 1.5 of the Draft and Supplemental Draft EIS, outreach to the community has been ongoing throughout the EIS process and included a scoping meeting held in October 2011 and a Draft EIS public information meeting held November 7, 2012. A public information meeting will be held for the Supplemental Draft EIS on January 26, 2015. Information about the proposed project and the details of all meetings held in Blackstone and Nottoway County has been extensively reported in local media on a daily or weekly basis and were easily accessible by minority and low-income people. Residents living in proximity to the proposed explosive ranges, those who would be displaced by the project, and the NAACP in Nottoway County were notified directly about opportunities for involvement in the decision about the project (refer to Chapter 9 <i>Draft EIS Distribution List</i>). Representatives of the community have been meaningfully involved throughout the process and have had numerous opportunities to ask questions directly of GSA and DOS representatives. There were no impacts identified that indicated the need for a more aggressive outreach program than has already been undertaken. The overwhelming majority of the community has voiced nothing but support for the proposed project. (continued on following page)</p>
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The percentages of minority and low income populations in the counties in the study area are above the state averages for minority and low income populations in the state of Virginia. There needs to be some mention of this in the FEIS. F2-AA

It would be helpful to show areas of potential Environmental Justice concern on all maps so that other reviewers and readers may be able to assess the proximity of the areas of potential Environmental Justice concern as related to project activities and potential impacts. F2-BB

Whenever possible and appropriate, tables should present data comparisons for the state, county and study area. F2-CC

Are there or will there be any activities taking place in close proximity to minority and/or low income populations in the short or long term that may cumulatively or singularly expose these at risk populations to potentially disproportionate or adverse impacts as related to construction, truck traffic, fugitive dusts, loss of services, noise, vibration, etc.? F2-DD

GSA references adherence to LEED/LID practices in Table 4.3-1. However, EPA is providing detailed information below for your consideration: F2-EE

**Leadership in Energy and Environmental Design (LEED)**

The LEED (Leadership in Energy and Environmental Design) Green Building Rating System is a voluntary, consensus-based national standard for developing high-performance, sustainable buildings. Members of the U.S. Green Building Council representing all segments of the building industry developed LEED and continue to contribute to its evolution. LEED standards are currently available for:

- New construction and major renovation projects (LEED-NC)
- Existing building operations (LEED-EB, Pilot version)
- Commercial interiors projects (LEED-CI, Pilot version)
- Core and shell projects (LEED-CS, Pilot version)

LEED was created in order to define "green building" by establishing a common standard of measurement; promote integrated, whole-building design practices; recognize environmental leadership in the building industry; stimulate green competition; raise consumer awareness of green building benefits; and transform the building market.

LEED provides a complete framework for assessing building performance and meeting sustainability goals. Based on well-founded scientific standards, LEED emphasizes state of the art strategies for sustainable site development, water savings, energy efficiency, materials,

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**GSA Response**

**F2-Z** (continued from previous page) Residents and businesses that would be relocated were visited by GSA representatives and would be provided all legally available assistance during the relocation process. Also refer to Section 6.16 *Other Management Actions*. Through GSA's Urban Development/Good Neighbor program and USEPA's Community Assistance and Research expertise, GSA and USEPA, in a joint effort with the town, county, Fort Pickett, and the Virginia Economic Development Partnership, will assist Blackstone and Nottoway County in preparing for FASTC-related economic effects. (refer to Tables ES-2 and 6.16-1).

**F2-AA**

Section 3.2.5.2 of the Draft EIS and Supplemental Draft EIS indicates those counties that have minority and low income populations greater than the state average.

**F2-BB**

A figure showing Environmental Justice areas in proximity to project impacts has been added to Section 4.2.5.1 *Environmental Justice*.

**F2-CC**

Section 3.2.5.2 and Tables 3.2-25 and 3.2-26 of the Draft EIS and Supplemental Draft EIS do include data comparisons for the state, county, and study area for minority and low income populations.

**F2-DD**

Additional discussion on proximity of Environmental Justice populations to impacts has been added to Section 4.2.5.1 *Environmental Justice*. Section 5.4.9 on cumulative impacts has also been updated accordingly.

**F2-EE**

Comment noted; should the decision be made to implement the project, the information provided would be considered during design.

selection and indoor environmental quality. LEED recognizes achievements and promotes expertise in green building through a comprehensive system offering project certification, professional accreditation, training and practical resources. For more information, contact the U.S. Green Building Council at the following web address:  
<http://www.usgbc.org/leed/leedmain.asp>.

**Low Impact Development (LID)**

Federal agencies are required to reduce the impacts on watershed hydrology and aquatic resources. This effort commonly referred to as low impact development (LID), implements environmentally and economically beneficial landscape practices into landscape programs, policies and practices by using a natural approach to land development and stormwater management. Federal agencies are required by Executive Order 13148 to incorporate the principles put forth in a Guidance dated August 10, 1995. This Guidance is intended to promote principles of "sustainable landscape design and management" which recognizes the interconnection of natural resources, human resources, site design, building design, energy management, water supply, waste prevention, and facility maintenance and operation.

It is important to incorporate LID efforts to mitigate the effects of development through traditional stormwater management practices which have proven to not be entirely successful. Traditional collection and conveyance systems, stormwater ponds and other stormwater facilities do not replicate natural systems, which greatly slow water before it reaches streams, wetlands and other waters. Development often times results in the loss of trees and other vegetation, the compaction of soils by heavy equipment, and the creation of vast stretches of connected impervious areas. These combined factors are extremely difficult to compensate for using traditional practices. As a result, the following site design (goals) and planning practices can be used to minimize stormwater impacts.

**Goal:** Minimize direct stormwater impacts to streams and wetlands to the maximum extent practicable.

**Practices:**

1. Locate stormwater facilities outside of streams and wetlands;
2. maintain natural drainage routes on site;
3. preserve riparian buffers; and
4. distribute "Integrated Management Practices" (IMP) used in lieu of centralized ponds.

**Goal:** Preserve the natural cover on as much of the site as possible, especially for areas located on hydrologic soil groups (HSG) A and B.

**Practices:**

1. Utilize clustered development designs and preserve a significant portion of the site in a natural state;

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**GSA Response**

No response necessary on this page.

9

- utilize "fingerprint" clearing by limiting the clearing and grading of forests and native vegetation to the minimum area needed for the construction of the lots, the provision of necessary access, and fire protection;
- avoid impacts to wetlands to vegetated riparian buffers; and
- preserve A and B Soils in natural cover.

**Goal:** Minimize the overall impervious cover.

**Practices:**

- Utilize the minimum required width for streets and roads;
- utilize street layouts that reduce the number of homes per unit length;
- minimize cul-de-sac diameters, use doughnut cul-de-sacs, or use alternative turnarounds;
- minimize excess parking space construction, utilize pervious pavers in low-use parking areas;
- utilize structured or shared parking;
- reduce home setbacks and frontages;
- where permitted, minimize sidewalk construction by utilizing sidewalks on one side only, utilizing "Skinny" sidewalks, or substituting sidewalks with pervious trails through common greenspace;
- substitute pervious surfaces for impervious wherever possible;
- where permitted, avoid the use of curb and gutter and utilize vegetated open swales, preferably "engineered swales" with a permeable soil base; and
- minimize compaction of the landscape and in areas where soils will be "disked" prior to seeding, and amended with loam or sand to increase absorption capacity.

**Goal:** Locate infiltration practices on HSG A and B soils wherever possible. Thus, every effort should be made to utilize areas with these soils for IMP that promote infiltration.

**Goal:** Locate impervious areas on less permeable soils (HSG C and D). Placement of impervious areas on lower permeability soils minimizes the potential loss of infiltration/recharge capacity on the site.

**Goal:** "Disconnect" impervious areas. "Disconnecting" means having impervious cover drain to pervious cover (i.e. downspouts draining to the yard, not the driveway). This decreases both the runoff volume and Time of Concentration.

**Goal:** Increase the travel time of water off of the site (Time of Concentration).

**Practices:**

- Flatten grades for stormwater conveyance to the minimum sufficient to allow positive drainage;
- increase the travel time in vegetated swales by using more circuitous flow routes, rougher vegetation in swales, and check dams; and
- utilize "engineered" swales in lieu of pipes or hardened channels.

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**GSA Response**

No response necessary on this page.

10

**Goal:** Utilize soil management/enhancement techniques to increase soil absorption.

**Practices:**

1. Delineate soils on site for the preservation of infiltration capacity; and
2. require compacted soils in areas receiving sheetflow runoff (such as yards, downslope of downspouts).

**Goal:** Revegetate all cleared and graded areas.

**Goal:** Use "engineered swales" for conveyance in lieu of curb and gutter wherever possible.

**Goal:** Utilize level spreading of flow into natural open space.

For additional and more comprehensive LID information, please refer to the following web sites.

**LID Manuals:**

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

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**GSA Response**

No response necessary on this page.



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December 7, 2012

9043.1  
ER 12/790

Ms. Abigail Low  
GSA Project Manager  
20 N 8th Street  
Philadelphia, PA 19107.

Dear Ms. Low,

The U.S. Department of the Interior has no comment on the Draft Environmental Impact Statement for the U.S. Department of State (DOS), Bureau of Diplomatic Security, Foreign Affairs Security Training Center (FASTC) at the Virginia Army National Guard's Maneuver Training Center at Fort Pickett and Nottoway County's Pickett Park in Nottoway County, Virginia.

F3

We appreciate the opportunity to provide these comments.

Sincerely,

Lindy Nelson  
Regional Environmental Officer,

GSA Response

F3  
Comment noted.

## **STATE AGENCIES**

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**COMMONWEALTH of VIRGINIA**  
DEPARTMENT OF TRANSPORTATION  
RICHMOND DISTRICT  
2430 Pine Forest Drive  
COLONIAL HEIGHTS, VA 23834  
www.VDOT.Virginia.gov

Gregory A. Whirley  
COMMISSIONER

November 15, 2012

Abigail Low, Project Manager  
U.S. General Services Administration  
20 N 8th Street  
Philadelphia, PA 19107

RE: Foreign Affairs Security Training Center (FASTC) at Fort Pickett  
Traffic Impact Analysis (TIA) Report dated 10/8/12  
Virginia Department of Transportation (Department) Comments

Dear Ms. Low:

As part of a technical study associated with an Environmental Impact Statement, in determining the impacts of the proposed FASTC development on the surrounding transportation system, developed was the subject TIA. Submitted by the US General Services Administration (GSA) on October 22, 2012 for Department comment is that TIA prepared by Timmons Group.

In anticipation of issuance of the preceding TIA formal comments, a meeting was held between the Department and representatives from the GSA, Timmons Group, Department of State (DOS) and CardnoTEC on November 8, 2012 to discuss the preliminary findings. Summarizing the findings and meeting discussion, noted below are the Department's comments.

The Department has evaluated the TIA in accordance with §15.2-2222.1 of the Code of Virginia and the Virginia Traffic Impact Analysis Regulations, 24 VAC 30-155 (also known as Chapter 527) and finds that the report conforms to the requirements of Chapter 527 in regard to the accuracy of the methodologies, assumptions and findings/conclusions presented in the analysis. Considered in the evaluation were impacts to only those intersections/roadways maintained by the Department.

C1-A

**Project Details**

Proposed is the establishment of a Diplomatic Security consolidated training center by the GSA and DOS to be located within and adjacent to the Fort Pickett National Guard Maneuver Training Center (Fort Pickett) currently occupied by the Virginia Army National Guard. The purpose of the

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**GSA Response**

**C1-A**

Comment noted.

Ms. Low  
November 15, 2012  
Page 2 of 6

facility is to provide skills to foreign affairs staff, Diplomatic Security agents, Foreign Services officers and other personnel.

The project construction timeline, training center alternatives and traffic generation are as follows:

- Training center construction is proposed in three phases. Those phases and anticipated completion dates are as follows: Phase 1 – 2017, Phase 2 – 2018 and Phase 3 – 2020 (buildout).
- The report analysis considers the completion years of each Phase 1 (2017) and Phase 3 (2020); Phase 2 work will not result in any traffic increase as proposed are only site improvements.
- Two build alternatives are considered in each phase; Build Alternative 1 and 2. Impacts to study intersections differ with each Build Alternative
- Site generated traffic at buildout is anticipated at 3,512 ADT; applicable to both Build Alternatives 1 and 2. The number of employees/students is the same for both.
- Access to the Fort will be through two entrances/checkpoints: Main Gate (Route 750 Military Road) and the West Gate (Route 643 West Entrance Road).

**Study Intersections**

The following state maintained TIA report study areas were reviewed by the Department (study intersections as numbered on report Fig 1-2):

Outside the Fort Pickett Reservation Boundary Limits:

- 1 Route 460 and Cox Road (Rt 460 Bus)

Within the Fort Pickett Reservation Boundary Limits:

- 2 Cox Road (Rt 460 Bus) and Military Road (Rt 750)
- 3 Darvills Rd. (Rt 40) and Military Road (Rt 750)
- 6 Military Rd (Fort) and Route 756 (Garnett Avenue)
- 8 Warehouse St. (Fort) and Rt 753 (West 10<sup>th</sup> St.)

Study areas 4, 5, 7, 9, 10 and 11 as indicated on the figure were not reviewed by the Department as they do not impact state maintained roadways/intersections.

C1-B

**GSA Response**

**C1-B**

Comment noted.

Ms. Low  
November 15, 2012  
Page 3 of 6

**Current and No-Build Intersection Impacts**

Existing and future traffic volumes without the proposed training center result in all state maintained study intersections operating at an acceptable level of service (LOS) during the AM and PM peak hours. No intersection improvements warranted.

C1-C

**2017 (Phase 1) Build Alternative 1 and 2 Intersection Impacts**

All state maintained study intersections will operate at an acceptable LOS during the AM and PM peak hours with the anticipated Phase 1 site generated traffic. However, turn lane improvements in accordance with Department warrants only are recommended at three of the state maintained intersections.

C1-D

**2020 (Phase 2) Build Alternative 1 and 2 Intersection Impacts**

State maintained intersections 1 and 3 are shown to experience an unacceptable LOS with Phase 2 site generated traffic. To address the unacceptable level service, turn lane improvements and intersection signage/flashing beacon alterations are recommended. Turn lane improvements are subsequently proposed at intersection 2 with the anticipated traffic as Department warrants are met.

C1-E

**Mitigation Measures**

The Department concurs with the study approach and conclusions on the report mitigation measures for the noted state maintained intersections:

- **Intersection 1 - Rt 460 at Cox Rd. (Rt 460 Bus)**
  - Phase 1 Rt 460 WB LTL/Taper extension – 350' lane/200' taper
  - Phase 2 Rt 460 WB LTL/Taper extension – 500' lane/200' taper
  - Rt 460 Bus NB Left-Thru construction – 200' lane/200' taper
- **Intersection 2 - Cox Rd. (Rt 460 Bus) at Military Rd. (Rt 750)**
  - Phase 1 Rt 460 Bus WB LTL/Taper construction – 200' lane/200' taper
  - Phase 2 Same Phase 1 improvements
- **Intersection 3 - Darvills Rd. (Rt 40) at Military Rd. (Rt 750)**
  - Phase 1 Rt 40 EB RTL/Taper extension – 200' lane/200' taper

C1-F

**GSA Response**

**C1-C**

The traffic analysis has been updated in Section 4.2.6 and Appendix H of the Supplemental Draft EIS.

**C1-D**

The traffic analysis has been updated in Section 4.2.6 and Appendix H of the Supplemental Draft EIS.

**C1-E**

The traffic analysis has been updated in Section 4.2.6 and Appendix H of the Supplemental Draft EIS.

**C1-F**

Virginia Department of Transportation (VDOT) concurrence with the approach and conclusions on mitigation measures noted. The traffic impact analysis has been updated for Build Alternative 3 in Section 4.2.6 and Appendix H of the Supplemental Draft EIS. Because of the reduction in employees traveling to FASTC, there would no longer be adverse impacts to traffic capacity or unacceptable LOS at intersections. Under Build Alternative 3 the turning lane analysis determined that the additional project traffic would result in the existing turning lane storage being less than VDOT design standards at one intersection Option A and three intersections under Option B. To address VDOT turning lane storage criteria, additional study by VDOT of potential turning lane improvements would be warranted.

Regarding the implementation of improvements, should VDOT determine they are warranted, GSA and DOS have no authority to fund or implement roadway improvements outside property boundaries. Intersection improvements would be under the jurisdiction of VDOT. Funding and implementation of improvements would have to occur through the appropriate Commonwealth of Virginia transportation organizations. Accordingly, state and/or local governments would determine whether improvements identified would be implemented.

<p>Ms. Low November 15, 2012 Page 4 of 6</p> <p>Phase 2      Rt 40 EB RTL/Taper extension – 200' lane/200' taper</p> <p>                    Rt 750 NB LTL/Taper extension – 200' lane/200' taper</p> <p>                    Rt 750 NB RT Taper extension – 200'</p> <p>                    Overall Intersection - Stop control changes – switch from Rt 750 approaches to Rt 40 approaches</p> <p>                    Overall Intersection – Remove existing red flashing beacon and replace with a yellow and red flashing beacon</p> <p>                    Overall Intersection – Install "Stop Ahead" signs on both approaches of Rt 40</p> <p><i>No improvements are warranted at state maintained intersections 6 and 8.</i></p> <p><b>VDOT Suggested Improvements</b></p> <p>The Department offers the following suggestions, to further mitigate anticipated impacts, with the noted intersection improvements as indicated above.</p> <ul style="list-style-type: none"> <li>• <i>Intersection 1 - Rt 460 at Cox Rd. (Rt 460 Bus)</i> <p>Phase 2      Rt 460 Bus NB - Construction of a 200'/200' RTL/Taper in association with the warranted/proposed NB Left-Thru.</p> </li> <li>• <i>Intersection 3 - Darvills Rd. (Rt 40) at Military Rd. (Rt 750)</i> <p>Phase 2      Overall Intersection – Construction of a round-about in lieu of the mitigation measures.</p> </li> </ul> <p><b>Roadway Abandonment</b></p> <p>Under the Build Alternative proposals, construction of the training facility would take place over the existing State maintained routes of 754, 755 and 756. Prior to construction, the noted routes are to be abandoned from the Secondary System of State Highways.</p> <p>Abandonment would be considered under Code Section 33.1-151 whereby Nottoway County initiates the process with the Department. Attached is a flow chart identifying the abandonment administrative steps involved. Further direction on the process is available in the <i>Guide for Additions and Abandonments and Discontinuances</i> found at the following link:</p> <p><a href="http://www.virginiadot.org/business/resources/additionsabandonmentsanddiscontinuances.pdf">http://www.virginiadot.org/business/resources/additionsabandonmentsanddiscontinuances.pdf</a></p>	<p><b>GSA Response</b></p> <p><b>C1-F</b> (Response on previous page.)</p> <p><b>C1-G</b> Suggestion noted. Also refer to Response C1-F.</p> <p><b>C1-H</b> Suggestion noted. Also refer to Response C1-F.</p> <p><b>C1-I</b> GSA appreciates the information provided with regard to roadway abandonment and would ensure the necessary steps are taken to comply with this requirement.</p>
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Ms. Low  
November 15, 2012  
Page 5 of 6

**Department Considerations**

The Department advises the following items/impacts be considered in moving forward with development of the FASTC facility and in undertaking the mitigation measures:

- *Improvements Concurrent with Department UPC 18964* – The Department is currently investigating the possibility of incorporating the intersection 1 turn lane improvements identified in both the TIA mitigation measure (NB Left-Thru) and the Department suggested improvement (NB RTL/Taper) into the anticipated Rt 460/Rt 460 Bus intersection work identified on the UPC project. If incorporated, it is anticipated that the work would be complete prior to 2017. C1-J
- *Right-of-Way Acquisition* – Mitigation measure intersection improvements may warrant the need to acquire additional right-of-way to accommodate turn lanes. Acquiring the right-of-way may further require negotiations with private land owners possibly adding to the project cost and impacting the schedule. Recommended is early research on the existing right-of-way designation/dedication/width to determine the extent of required acquisition. C1-K
- *VDOT Permitting Requirements* – A Land Use Permit issued by the Department is required for all work within the state maintained right-of-way, including for the construction of access to the site from a state route, for the demolition/reconstruction of access points that that adjoin Rt 753 (W. 10<sup>th</sup> St.) and for any intersection/reconstruction work. A plan identifying the proposed right-of-way work shall be submitted for review/approval prior to permit issuance. C1-L
- *Roadway Abandonment* – This item could impact the project schedule as training center construction cannot proceed until the impacted state routes are abandoned. Recommended is early coordination between the Department and Nottoway County on the process of abandoning the roadways, since the abandonment process can take up to 6 months. Note that the process can only proceed with Nottoway County BOS determination that either (1) "no public necessity exists for the continuance of the section of secondary road as a public road" (i.e. lack of public use) or (2) the safety and welfare of the public would be served best by abandoning the section of road". C1-M
- *Access Management* – Although no new access points off of a state maintained route are indicated in the TIA, be advised that should the current concept be revised and a new access proposed, the location of the access shall comply with spacing standards (between other intersections) as outlined in the Department's Access Management Regulations. C1-N
- *Zoning* – Not identified in the report is the current zoning of the land which the improvements are proposed. Confirmed at the November 8 meeting by Timmons was that the property is currently zoned for it intended use. C1-O

**GSA Response**

**C1-J**  
GSA appreciates VDOT's efforts to incorporate the noted intersection improvements at Route 460/Route 460 Business (Cox Road) into state project UPC 18964.

**C1-K**  
Comment noted. Refer to Response C1-F.

**C1-L**  
GSA would determine the need for a Land Use Permit for access to a state route during project design, and would submit plans to VDOT, if required.

**C1-M**  
GSA appreciates the information provided with regard to the scheduling requirements for roadway abandonment. The necessary steps would be taken to comply with this requirement.

**C1-N**  
Comment noted

**C1-O**  
Comment noted. Zoning is discussed in Section 3.2.4 of the Draft and Supplemental Draft EIS.

Ms. Low  
November 15, 2012  
Page 6 of 6

Should you have any questions on the comments, I can be reached at 804-863-4012.

As the project moves forward, I'll also be the main point of contact for all project related items that entail Department involvement.

Please advise on the need for direction on the abandonment process, access to right-of-way records, or any general assistance on transportation related items as the project moves forward.

Sincerely,



Brian Lokker, P.E.  
Area Land Use Engineer, South

Attachment – Abandonment Flow Chart

CC: J. Bernard (DOS)  
S. Dunn (Timmons)  
M. Goodman (GSA)  
K. Hall (CardnoTEC)

**GSA Response**

No response necessary on this page.



**COMMONWEALTH of VIRGINIA**

**DEPARTMENT OF ENVIRONMENTAL QUALITY**  
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Douglas W. Dauterch  
Secretary of Natural Resources

David K. Faylor  
Director

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

December 6, 2012

Ms. Abigail Low  
General Services Administration  
20 N. 8<sup>th</sup> Street  
Philadelphia, PA 19107

RE: Draft Environmental Impact Statement: U.S. General Services Administration  
Foreign Affairs Training Center located in Nottoway County, DEQ 12-189F

Dear Ms. Low:

The Commonwealth of Virginia has completed its review of the draft environmental impact statement (EIS) for the above-referenced project. The Department of Environmental Quality (DEQ) is responsible for coordinating Virginia's review of federal environmental documents prepared pursuant to the National Environmental Policy Act and responding to appropriate federal officials on behalf of the Commonwealth. The following agencies, localities and planning district commissions participated in this review:

- Department of Environmental Quality
- Department of Game and Inland Fisheries
- Department of Conservation and Recreation
- Department of Historic Resources
- Department of Health
- Department of Forestry
- Marine Resources Commission
- Department of Aviation
- Nottoway County
- Prince Edward County
- Lunenburg County
- Crater Planning District Commission
- Richmond Regional Planning District Commission

**GSA Response**

No response necessary on this page.

U.S. General Services Administration  
Draft EIS Foreign Affairs Training Center  
DEQ 12-189F  
Page 2

The Department of Agriculture and Consumer Services, the Department of Mines Minerals and Energy, Department of Transportation, Commonwealth Regional Commission, Southside Planning District Commission, Town of Blackstone, Amelia County, Brunswick County, Chesterfield County, Dinwiddie County, Department of Military Affairs, Southside Virginia Community College, Southern Piedmont Agricultural Research and Extension Center, Conservation Management Institute and the Department of State Police also were invited to comment.

**PROJECT DESCRIPTION**

The U.S. General Services Administration (GSA) submitted a draft EIS for the proposed construction of the Foreign Affairs Security Training Center (FASTC) and associated land acquisition in Nottoway County. The proposed project site is located on four parcels of land within and adjacent to the Army National Guard Maneuver Training Center at Fort Pickett, which is operated by the Virginia Army National Guard. The four parcels comprise approximately 1,502 acres. The FASTC would be a consolidated training center for a rotating student population (primarily government employees) of 8,000 to 10,000 annually. Approximately 850 to 1,070 employees would work at the FASTC. Development would include classrooms, simulation labs, fitness center, driving tracks, mock urban environments, firing and explosives ranges, administrative offices, dormitories, dining hall and facilities for emergency medical response services. The FASTC is scheduled to be constructed in three phases from 2014 to 2017, 2016 to 2018, and 2018 to 2020. The draft EIS considers two build alternatives as well as a no action alternative. According to the draft EIS, the major differences between Build Alternative 1 and Build Alternative 2 (Preferred Alternative) are the locations of the Main Campus, Mock Urban Environments, and three buildings of the High Speed Driving Track Area. Build Alternative 2 would also require utilities infrastructure improvements.

**ENVIRONMENTAL IMPACTS AND MITIGATION**

**1. Subaqueous Lands Management.** The EIS (page 4-6) states that both build alternatives would include stream crossings.

**1(a) Agency Jurisdiction.** The Virginia Marine Resources Commission (VMRC) regulates encroachments in, on or over state-owned subaqueous beds as well as tidal wetlands pursuant to Virginia Code § 28.2-1200 through 1400.

The VMRC serves as the clearinghouse for the Joint Permit Application (JPA) used by the:

- U.S. Army Corps of Engineers (Corps) for issuing permits pursuant to Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act;

**GSA Response**

No response necessary on this page.

U.S. General Services Administration  
 Draft EIS Foreign Affairs Training Center  
 DEQ 12-189F  
 Page 3

- DEQ for issuance of a Virginia Water Protection (VWP) permit;
- VMRC for encroachments on or over state-owned subaqueous beds as well as tidal wetlands; and
- local wetlands board for impacts to wetlands.

The VMRC will distribute the completed JPA to the appropriate agencies. Each agency will conduct its review and respond.

**1(b) Agency Findings.** VMRC states that any activities or construction within perennial streams draining 5 square miles or greater would need to be reviewed for potential authorization from the VMRC. The submerged lands under these waterways are considered to be public, state-owned property, managed by VMRC. While VMRC was unable to determine if there are to be any direct impacts to these jurisdictional lands, if there are proposed impacts, a Joint Permit Application (JPA) would need to be completed and submitted for VMRC's review and possible permit issuance through the public interest review process. The following web address links to the JPA: [http://www.nao.usace.army.mil/Portals/31/docs/regulatory/RPSPdocs/Revised\\_Standard\\_JPA\\_JULY2012\\_FillableForm.pdf](http://www.nao.usace.army.mil/Portals/31/docs/regulatory/RPSPdocs/Revised_Standard_JPA_JULY2012_FillableForm.pdf).

C2-A

**1(c) Requirement.** If there are proposed impacts to state-owned subaqueous beds and tidal wetlands as well as proposed stream crossings, a Joint Permit Application (JPA) would need to be completed and submitted to VMRC.

C2-B

**1(d) Agency Recommendation.** Coordinate with VMRC regarding applicable permits and the submission of a JPA.

C2-C

**2. Water Quality and Wetlands.** The EIS (pages 4-5 to 4-11) states that impacts to water resources are evaluated for both temporary construction and long-term operational phases. Wetlands and streams would be impacted by the implementation of both build alternatives.

**2(a) Agency Jurisdiction.** The State Water Control Board promulgates Virginia's water regulations, covering a variety of permits to include Virginia Pollutant Discharge Elimination System Permit, Virginia Pollution Abatement Permit, Surface and Groundwater Withdrawal Permit, and the Virginia Water Protection (VWP) Permit. The VWP Permit is a state permit which governs wetlands, surface water and surface water withdrawals/impoundments. It also serves as § 401 certification of the federal Clean Water Act § 404 permits for dredge and fill activities in waters of the United States. The VWP Permit (VWPP) Program is under the Office of Wetlands and Water Protection/Compliance within the DEQ Division of Water Quality Programs. In addition to central office staff who review and issue VWP permits for transportation and water

**GSA Response**

**C2-A**

A Joint Permit Application for wetland impacts would be submitted for VMRC's review.

**C2-B**

A Joint Permit Application for wetland impacts would be submitted for VMRC's review.

**C2-C**

VMRC would be included in agency coordination regarding the Joint Permit Application.

U.S. General Services Administration  
 Draft EIS Foreign Affairs Training Center  
 DEQ 12-189F  
 Page 4

withdrawal projects, the six DEQ regional offices perform permit application reviews and issue permits for the covered activities.

**2(b) Agency Comments.** The DEQ Blue Ridge Regional Office (BRRO) states that the draft EIS (page 4-8, Section 4.1.4.1 Wetlands) indicates that the GSA would have to obtain a permit from the Corps for wetlands and stream impacts under Clean Water Act Sections 404 and 401. The VWP Program states that GSA also needs to coordinate these permits with DEQ BRRO.

C2-D

**2(c) Requirement.**

- If impacts to surface waters and wetlands are proposed, a WVP Permit from DEQ may be required.

C2-E

**2(d) Agency Recommendations.** Coordinate with the DEQ BRRO regarding applicable permits.

In general, DEQ recommends that impacts to surface waters, including wetlands, be avoided to the maximum extent practicable and encourages the following construction practices to minimize impacts:

- Operate machinery and construction vehicles outside of stream-beds and wetlands; use synthetic mats when in-stream work is unavoidable.
- Preserve the top 12 inches of material removed from wetlands for use as wetland seed and root-stock in the excavated area.
- Design erosion and sedimentation controls in accordance with the most current edition of the *Virginia Erosion and Sediment Control Handbook*. These controls should be in place prior to clearing and grading, and maintained in good working order to minimize impacts to state waters. The controls should remain in place until the area is stabilized.
- Place heavy equipment, located in temporarily impacted wetland areas, on mats, geotextile fabric, or use other suitable measures to minimize soil disturbance, to the maximum extent practicable.
- Restore all temporarily disturbed wetland areas to pre-construction conditions and plant or seed with appropriate wetlands vegetation in accordance with the cover type (emergent, scrub-shrub or forested). The applicant should take all appropriate measures to promote revegetation of these areas. Stabilization and restoration efforts should occur immediately after the temporary disturbance of each wetland area instead of waiting until the entire project has been completed.
- Place all materials which are temporarily stockpiled in wetlands, designated for use for the immediate stabilization of wetlands, on mats or geotextile fabric in order to prevent entry in state waters. These materials should be managed in a

C2-F

**GSA Response**

**C2-D**

GSA would coordinate with both the Army Corps of Engineers and the VDEQ Blue Ridge Regional Office in obtaining permits.

**C2-E**

GSA would obtain all required permits.

**C2-F**

The alternatives development process and the build alternatives of this EIS have incorporated existing roads and stream crossings where feasible. This wetland impact avoidance measure would be carried through to the design process. Additional opportunities for impact minimization and use of existing stream crossings would be considered during project design. Sections 4.1.4.1 and 4.1.4.3 discuss avoidances and regulations that would be followed as well as mitigation for wetland impacts.

All wetlands and streams on all proposed site parcels, including those within 50 feet of all project activities, were flagged during the 2011-2012 wetland delineations.

U.S. General Services Administration  
 Draft EIS Foreign Affairs Training Center  
 DEQ 12-189F  
 Page 5

manner that prevents leachates from entering state waters and must be entirely removed within thirty days following completion of that construction activity. The disturbed areas should be returned to their original contours, stabilized within thirty days following removal of the stockpile, and restored to the original vegetated state.

- Flag or mark all non-impacted surface waters within the project or right-of-way limits that are within 50 feet of any clearing, grading or filling activities for the life of the construction activity within that area. The project proponent should notify all contractors that these marked areas are surface waters where no activities are to occur.
- Employ measures to prevent spills of fuels or lubricants into state waters.

C2-F

**3. Erosion and Sediment and Stormwater Management Controls.** The EIS (page 5-15) states that erosion and sedimentation controls would be employed for all construction projects as required by federal and state regulations.

**3(a) Agency Jurisdiction.** The Department of Conservation and Recreation (DCR) Division of Stormwater Management (DSM) administers the Virginia Erosion and Sediment Control Law and Regulations (VESCL&R) and the Virginia Stormwater Management Law and Regulations (VSWML&R).

**3(b) Erosion and Sediment Control.** According to DCR, the applicant and its authorized agents conducting regulated land disturbing activities on private and public lands in the state must comply with the VESCL&R and VSWML&R, including coverage under the general permit for stormwater discharge from construction activities, and other applicable federal nonpoint source pollution mandates (e.g. Clean Water Act-Section 313). Clearing and grading activities, installation of staging areas, parking lots, roads, buildings, utilities, borrow areas, soil stockpiles, and related land-disturbance activities that result in the land-disturbance of equal to or greater than 10,000 square feet would be regulated by VESCL&R. Accordingly, the applicant must prepare and implement an ESC plan to ensure compliance with state law and regulations. The ESC plan is submitted to the DCR regional office that serves the area where the project is located for review for compliance. The applicant is ultimately responsible for achieving project compliance through oversight of on-site contractors, regular field inspection, prompt action against non-compliant sites, and other mechanisms consistent with agency policy (Reference: VESCL §10.1-567).

C2-G

**3(c) Virginia Stormwater Management Program General Permit for Stormwater Discharges from Construction Activities.** According to the DCR, the operator or owner of construction activities involving land-disturbing activities equal to or greater than 1 acre are required to register for coverage under the General Permit for Discharges of

C2-H

**GSA Response**

**C2-F**

(Response provided on previous page.)

**C2-G**

All regulated land disturbance would be conducted in compliance with the minimum standards outlined in the Virginia Erosion and Sediment Control Regulations; also refer to Section 4.1.3.1 of the Draft and Supplemental Draft EIS.

**C2-H**

GSA would obtain all applicable permits and prepare all required plans, including a Stormwater Pollution Prevention Plan; also refer to Section 4.1.4.1 of the Draft and Supplemental Draft EIS.

U.S. General Services Administration  
 Draft EIS Foreign Affairs Training Center  
 DEQ 12-189F  
 Page 6

Stormwater from Construction Activities and develop a project-specific stormwater pollution prevention plan (SWPPP).

- Construction activities requiring registration also includes the land-disturbance of less than one acre of total land area that is part of a larger common plan of development or sale if the larger common plan of development will ultimately disturb equal to or greater than one acre.
- The SWPPP must be prepared prior to submission of the registration statement for coverage under the general permit.
- The SWPPP must address water quality and quantity in accordance with the Virginia Stormwater Management Program (VSMP) Permit Regulations.

General information and registration forms for the general permit are available on DCR's website at [www.dcr.virginia.gov/soil\\_and\\_water/index.shtml](http://www.dcr.virginia.gov/soil_and_water/index.shtml).

**4. Air Pollution Control.** The EIS (page 4-24) states that an air emissions analysis indicates that construction and operational emissions would remain well below the significance thresholds and would not have a significant impact on the local or regional air quality.

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

**4(b) Ozone Attainment Area.** The DEQ Air Division states that the proposed project is located in an ozone attainment area.

**4(c) Requirements.**

**4(c)(i) Open Burning.** If the project includes the burning of vegetative debris and/or demolition and construction material, this activity must meet the requirements under 9VAC5-130 *et seq.* of the regulations for open burning, and it may require a permit. The

C2-H

C2-I

C2-J

**GSA Response**

**C2-H**

(Response provided on previous page.)

**C2-I**

Comment noted. This status is reflected in Section 3.2.2.2 of the Draft and Supplemental Draft EIS.

**C2-J**

GSA Facilities Standards for Public Buildings (P100) would require that 50% of construction debris be recycled or reused. The remaining vegetative debris and/or demolition and construction materials would be disposed of in accordance with all laws and regulations. Open burning of construction debris would not be conducted. Nottoway County does not have ordinances and permitting requirements for open burning. This information has been added to Section 4.2.2.1 *Air Quality, Construction*.

U.S. General Services Administration  
 Draft EIS Foreign Affairs Training Center  
 DEQ 12-189F  
 Page 7

regulations provide for, but do not require, the local adoption of a model ordinance concerning open burning. The responsible party should contact Nottoway County to determine what local requirements, if any, exist.

C2-J

**4(c)(ii) Fugitive Dust.** During construction, fugitive dust must be kept to a minimum by using control methods outlined in 9VAC5-50-60 *et seq.* of the Regulations for the Control and Abatement of Air Pollution. These precautions include, but are not limited to, the following:

C2-K

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

**4(c)(iii) Fuel-Burning Equipment.** Fuel-burning equipment (boilers, generators, compressors, etc.) or any other air-pollution-emitting equipment may be subject to 9VAC5-80, Article 6, Permits for New and Modified sources.

C2-L

**4(d) Agency Recommendation.** Contact DEQ BRRO for information on requirements related to registration of fuel-burning equipment, as applicable.

C2-M

**5. Solid and Hazardous Waste Management.** The EIR (page 4-7) indicates that implementation of the proposed action would increase the use of petroleum products, hazardous waste and other materials. However, adherence to regulations and plans for the transport and storage of hazardous waste, pesticides and fertilizers would avoid or minimize the potential for accidental release.

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

**GSA Response**

**C2-J**

(Response provided on previous page.)

**C2-K**

Section 4.2.2 discusses fugitive dust control. Additional language has been added to the Supplemental Draft EIS to encompass additional measures that may be employed.

**C2-L**

The proposed boilers are all less than 10,000,000 Btu/hr and therefore are exempt from permitting regulations of the Commonwealth of Virginia for stationary sources of air emissions. The emergency generators are exempt from permitting regulations provided hours of operation are kept below 500 hours per year. Refer to Section 4.2.2.

**C2-M**

Section 4.2.2 analyzes fuel-burning equipment relative to the requirements of 9VAC5-80.

U.S. General Services Administration  
 Draft EIS Foreign Affairs Training Center  
 DEQ 12-189F  
 Page 8

**5(b) Agency Comments.** The DEQ Division of Land Protection and Revitalization (DLPR) (formerly known as the DEQ Waste Division) states that the EIS addresses potential solid waste and/or hazardous waste issues and includes a thorough review of potential environmental issues related to the parcels identified for development. The report appears to indicate that DEQ's databases and DLPR files were searched, and indicates that DEQ offices had been contacted about possible ground contamination concerns. The DLPR staff has conducted a cursory review of its database files under zip code 23824, including a Geographic Information System database search (within a 0.5-mile radius) of the project site, and identified the information below. Comments from the DEQ Federal Facilities Program are included. The sites identified are for reference as their proximity to the subject site are unknown.

**RCRA/Hazardous Waste Facilities**

- BRAC Property Fort Pickett, 403 Military Road, Blackstone, VA 23824. ID# 0213720931. Contact: Francis Gilmore at 434-292-3317.
- Fort Pickett USARC AMSA No. 88, Bldg 564 Kemper Avenue, Blackstone, VA 23824. ID# VAR000005553. Contact: Michele Brown at 804-233-6473.
- MTC Fort Pickett, VAARNG-FM-E, Bldg 234, Blackstone, VA 23824. ID# VAD988228359. Contact: David K. Short at 434-292-2144.
- VAARNG-ARMORY-Blackstone, N. High Street, Blackstone, VA 23824. ID# VAD982677429. Contact: Pamela W. Coleman at 434-298-6445.
- VIP & SU Southern Piedmont AES, Highway 40 East, Blackstone, VA 23824. ID# 988224937. Contact: Jack Nunes at 540-231-8758.

**CERCLA Site**

- Fort Pickett, Kemper Avenue, Blackstone, VA 23824. EPA ID 2210020705. Not NPL.

The following websites may prove helpful in locating additional information:

- [www.epa.gov/superfund/sites/cursites/index.htm](http://www.epa.gov/superfund/sites/cursites/index.htm)
- [www.epa.gov/enviro/html/rcris/rcris\\_query\\_java.html](http://www.epa.gov/enviro/html/rcris/rcris_query_java.html)

**Formally Used Defense Sites**

- C03VA0028/VA9799F7770, Fort Picket Mill Resv, Blackstone
- C03VA0220/VA9899F1674, Fort Pickett A ARPT, Blackstone

GSA Response

**C2-N**

Sections 3.2.11 and 4.2.11 of the Draft and Supplemental Draft EIS are based on comprehensive Phase I and Phase II Environmental Site Assessments performed for the proposed project land parcels. All potential sites of environmental concern have been documented. Follow up investigations have been conducted since the publication of the Draft EIS, and the results are included in this Sections 3.2.11 and 4.2.11 of the Supplemental Draft EIS.

Regarding the sites noted from VDEQ's database, sites 0213720931 and VAD988228359 are within Pickett Park northeast of LRA Parcel 9. Neither site would be affected by the project. Site VAR00000553 is located adjacent to the Grid parcel, which has recently been subject to soil and groundwater testing to ensure activities associated with Site VAR00000553 have not affected soils or groundwater conditions on the Grid Parcel (refer to Section 3.2.11 and 4.2.11). Sites VAD982677429 and 988224937 are not located near any of the FASTC parcels.

C2-N

<p>U.S. General Services Administration Draft EIS Foreign Affairs Training Center DEQ 12-189F Page 9</p> <p>The DEQ's Federal Facilities Restoration Program reviewed this submittal and it appears that the project will not impact any sites at Fort Pickett (Environmental Restoration Program, Base Realignment and Closure, and Formerly Used Defense Sites).</p> <p><b>Solid Waste Facility</b></p> <ul style="list-style-type: none"> <li>• SWP333 – U.S. Army Fort Pickett, Closed Sanitary Landfill, Rives Road at 9<sup>th</sup> Street, Blackstone, VA 23824.</li> </ul> <p><b>Petroleum Release Site</b></p> <ul style="list-style-type: none"> <li>• ID# 20112039 – Grant Residence, 39 Maple Lane, Blackstone, VA 23824. Event Date: 10/25/2010. Status: Closed.</li> </ul> <p><b>5(c) Requirements.</b></p> <p><b>5(c)(i) Asbestos-Containing Materials and Lead-Based Paint.</b> All structures being demolished or removed should be checked for asbestos-containing materials (ACM) and lead-based paint (LBP) prior to demolition. If ACM and LBP are found, in addition to the federal waste-related regulations mentioned above, state regulations 9VAC20-81-640 for ACM and 9VAC20-60-261 for LBP must be followed.</p> <p><b>5(c)(ii) Soil and Waste Management.</b> Any soil that is suspected of contamination or wastes that are generated must be tested and disposed of in accordance with applicable Federal, State, and local laws and regulations.</p> <p><b>5(c)(iii) Petroleum Storage Tanks.</b> Conduct the removal, relocation or closure of any regulated petroleum storage tanks – aboveground storage tanks (ASTs) or underground storage tank (USTs) – in accordance with the requirements of the Virginia Tank Regulations 9VAC25-91-10 <i>et seq.</i> for ASTs and 9VAC25-580-10 <i>et seq.</i> for USTs. Report the installation or use of any portable aboveground petroleum storage tank (&gt; 660 gallons, 9VAC 25-91-10 <i>et seq.</i>) for more than 120 days the DEQ BRRO Petroleum Storage Tank Program.</p> <p><b>5(d) Agency Recommendations.</b></p> <ul style="list-style-type: none"> <li>• DEQ encourages all projects and facilities to implement pollution prevention principles, including:             <ul style="list-style-type: none"> <li>○ the reduction, reuse and recycling of all solid wastes generated; and</li> <li>○ the minimization and proper handling of generated hazardous wastes.</li> </ul> </li> </ul>	<p><b>GSA Response</b></p> <p><b>C2-N</b> (Response provided on previous page.)</p> <p><b>C2-O</b> As indicated in section 4.2.11.1, surveys would be conducted prior to demolition and any disposal would be adhere to applicable state, federal, and local requirements for protecting human health and safety and the environment.</p> <p><b>C2-P</b> Procedures would be in place for safe handling, use, and disposal of existing or introduced hazardous substances and waste during demolition, construction, and operations. Also refer to Response C2-N.</p> <p><b>C2-Q</b> Section 4.2.11.1 indicates that tanks would be removed and closed by a licensed contractor in coordination with VDEQ. Additional investigations have been conducted since publication of the Draft EIS to locate and characterize soil conditions associated with undocumented USTs/ASTs to the extent feasible. The results of these investigations are included in Section 4.2.11 of this Supplemental Draft EIS. Contaminant levels are not anticipated to be high and would be managed on a case by case basis in accordance with applicable federal, state, and local regulations, if such locations are encountered during demolition activities. If unregistered or unknown USTs are encountered during construction, they would be removed and closed by a licensed contractor in coordination with VDEQ.</p> <p><b>C2-R</b> Chapter 6 and Table 6.16-1 of the Draft and Supplemental Draft EIS discuss impact minimization and mitigation measures including pollution prevention and hazardous materials/hazardous waste management (CERCLA, RCRA, Oil Pollution Act, Pollution Prevention Act). The description of the Proposed Action (Section 2.1) addresses energy efficiency and reduction of waste, pollution, and environmental impacts to achieve certification as LEED Silver buildings. Pollution prevention principles are also incorporated into GSA Sustainable Design Principles.</p>
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U.S. General Services Administration  
 Draft EIS Foreign Affairs Training Center  
 DEQ 12-189F  
 Page 10

- Contact the U.S. Environmental Protection Agency (EPA) for information concerning Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) obligations at Fort Pickett's Main Post, including establish the nature and extent of any known environmental contamination at or near Fort Pickett, or other Areas of Concern (AOCs) which may be in close proximity to the proposed project.

C2-R

**6. Natural Heritage Resources.** The EIS (pages 4-16 and 4-17) states that mitigation for habitat loss would be implemented to the extent feasible.

**6(a) Agency Jurisdiction.**

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

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

**GSA Response**

**C2-R**

(Response provided on previous page.)

U.S. General Services Administration  
 Draft EIS Foreign Affairs Training Center  
 DEQ 12-189F  
 Page 11

**6(b) Agency Findings.** The DCR DNH searched its Biotics Data System for occurrences of natural heritage resources from the project area. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.

According to the information in DCR's files, the Fort Pickett Impact Area is within the project vicinity. Conservation sites are tools for representing key areas of the landscape that warrant further review for possible conservation action because of the natural heritage resources and habitat they support. Conservation sites are polygons built around one or more rare plant, animal, or natural community designed to include the element and, where possible, its associated habitat, and buffer or other adjacent land thought necessary for the element's conservation. Conservation sites are given a biodiversity significance ranking based on the rarity, quality, and number of element occurrences they contain; on a scale of 1-5, 1 being most significant. Fort Pickett Impact Area Conservation Site has been given a biodiversity significance ranking of B1, which represents a site of outstanding significance. The natural heritage resource of concern at this site is Michaux's sumac (*Rhus michauxii*, G2G3/S1/LE/LT).

Michaux's sumac is a dioecious shrub that grows from 0.3 – 0.6 meter tall (NatureServe 2011). This plant occurs in sandy or rocky, open, hardwood-dominated forests and savannas (Van Alstine and Smith, 1995), sometimes in association with circumneutral soils. It is dependent upon some form of disturbance to maintain its open habitat (NatureServe 2011). Periodic, naturally occurring fires provided such disturbance historically; however, today many of this plant's occurrences are in areas artificially disturbed such as highway, powerline and railroad rights-of-way, edges of cultivated fields, and other cleared lands. In Virginia, all but one of the known occurrences are located within Fort Pickett in the southern Piedmont where it is maintained by frequent fires. The major threats to Michaux's sumac include fire suppression and habitat degradation (NatureServe 2011). The optimal survey time period for Michaux's sumac is during the period of flowering / fruiting from June 1 – October 31 when the plant has higher visibility, but the plant can be identified as long as the leaves are present from May 1 – October 31. Michaux's sumac is classified as endangered by the FWS and listed as threatened by the Virginia Department of Agriculture and Consumer Services (VDACS).

**6(c) State-listed Plant and Insect Species.**

- As identified in Item 6(b), Michaux's sumac is classified as endangered by VDACS. Due to the potential for this site to support populations of Michaux's sumac, DCR recommends an inventory for the resource in the study area. With the survey results, DCR DNH can more accurately evaluate potential impacts to

**GSA Response**

**C2-S**

Section 3.1.5.3 of the Draft EIS identified Michaux's sumac as a federally listed species known to be present at Fort Pickett. All details about state and federal threatened and endangered species were provided in correspondence to Ms. Rene Hypes, Virginia Department of Conservation and Recreation (DCR) Division of Natural Heritage, dated July 16, 2012.

Section 3.1.5.3 of the Draft and Supplemental Draft EIS indicates that the only suitable habitat for Michaux's sumac in the project area was on an existing power line on LRA Parcel 10. GSA contracted with a USFWS approved botanist to conduct a survey for Michaux's sumac, and the plant was not found. The findings of this survey were included in correspondence sent to DCR on July 16 2012 (refer to Appendix C of the Draft and Supplemental Draft EIS) and were included in Section 3.1.5.3 of the Draft and Supplemental Draft EIS. Refer to Appendix C for the correspondence, which includes the Michaux's sumac survey submitted to USFWS and USFWS concurrence with GSA's "no affect" determination with regards to Michaux's Sumac. LRA Parcel 10 is no longer included in the proposed site for Build Alternative 3 in this Supplemental Draft EIS.

**C2-T**

Refer to Response C2-S.

C2-S

C2-T

U.S. General Services Administration  
 Draft EIS Foreign Affairs Training Center  
 DEQ 12-189F  
 Page 12

natural heritage resources and offer specific protection recommendations for minimizing impacts to the documented resources. Survey results should be coordinated with DCR DNH and FWS. Upon review of the results, if it is determined the species is present, and there is a likelihood of a negative impact on the species, DCR DNH will recommend coordination with VDACS to ensure compliance with Virginia's Endangered Plant and Insect Species Act.

- VDACS did not respond to DEQ's request for comment.

C2-T

**6(d) Natural Area Preserves.** DCR found that there are no State Natural Area Preserves under its jurisdiction in the project vicinity.

C2-U

**6(e) Agency Recommendations.** DCR DNH has the following recommendations:

- Conduct inventory for Michaux's sumac in the study area.
- Coordinate survey results with DCR DNH (and VDACS if directed by DCR DNH) and FWS.
- Coordinate with DCR DNH since its biologists are qualified and available to conduct inventories for rare, threatened, and endangered species and to discuss arrangements for field work.

C2-V

**7. Fisheries and Wildlife Management.** The EIS (page 4-17) states that impacts to protected species would be minimized through regulatory compliance.

**7(a) Jurisdiction.** The Department of Game and Inland Fisheries (DGIF), as the Commonwealth's wildlife and freshwater fish management agency, exercises enforcement and regulatory jurisdiction over wildlife and freshwater fish, including state- or federally-listed endangered or threatened species, but excluding listed insects (Virginia Code Title 29.1). DGIF is a consulting agency under the U.S. Fish and Wildlife Coordination Act (16 U.S.C. sections 661 *et seq.*) and provides environmental analysis of projects or permit applications coordinated through DEQ and several other state and federal agencies. DGIF determines likely impacts upon fish and wildlife resources and habitat, and recommends appropriate measures to avoid, reduce or compensate for those impacts.

**7(b) Agency Findings.** According to DGIF's records, the state-listed threatened barking tree frogs have been documented from the project area. However, DGIF believes these specimens were moved to this site in agricultural supplies and are not a native population of the species. Therefore, DGIF has determined this project is not likely to result in adverse impacts upon this species.

C2-W

**7(c) Agency Comments.** DGIF generally does not support proposals to mitigate wetland impacts through the construction of stormwater management ponds or support

C2-X

**GSA Response**

**C2-T**

(Response provided on previous page.)

**C2-U**

Comment noted.

**C2-V**

Refer to response C2-S.

**C2-W**

Comment noted.

**C2-X**

Sections 4.1.4.3 and 6.3 of the Draft and Supplemental Draft EIS note proposed mitigation through wetland mitigation banks. Stormwater management ponds are not part of the planned mitigation for wetland impacts. GSA will coordinate with Commonwealth of Virginia agencies regarding mitigation during the Joint Permit Application process.

U.S. General Services Administration  
 Draft EIS Foreign Affairs Training Center  
 DEQ 12-189F  
 Page 13

the creation of in-stream stormwater management ponds. DGIF is willing to assist the GSA in developing a plan that includes open-space, wildlife habitat, and natural stream channels which retain their wooded buffers.

C2-X

**7(d) Agency Recommendations.** To minimize overall impacts to wildlife and natural resources, DGIF offers the following recommendations about development activities:

- Avoid and minimize impacts to undisturbed forest, wetlands, and streams to the fullest extent practicable. Avoidance and minimization of impact may include relocating stream channels as opposed to filling or channelizing as well as using, and incorporating into the development plan, a natural stream channel design and wooded buffers.
- Maintain undisturbed wooded buffers of at least 100 feet in width around all on-site wetlands and on both sides of all perennial and intermittent streams.
- Maintain wooded lots to the fullest extent possible.
- Design the stormwater controls for this project to replicate and maintain the hydrographic condition of the site prior to the change in landscape. This should include, but not be limited to the following:
  - using bioretention areas; and
  - minimizing the use of curb and gutter in favor of grassed swales.
 Bioretention areas (also called rain gardens) and grass swales are components of Low Impact Development (LID). They are designed to capture stormwater runoff as close to the source as possible and allow it to slowly infiltrate into the surrounding soil. They benefit natural resources by filtering pollutants and decreasing downstream runoff volumes.
- Adhere to a time-of-year restriction from March 15 to August 15 of any year to protect nesting resident and migratory songbirds.
- Adhere to erosion and sediment controls during ground disturbance.

C2-Y

**7(e) Additional Information.** DGIF maintains a database (<http://valwis.org/twis/>) of wildlife locations, including threatened and endangered species, trout streams and anadromous fish waters.

**8. Forestry Resources.** The EIS (page ES-9) states that 500 to 525 acres of forested area may be impacted by the proposed action.

**8(a) Agency Jurisdiction.** The mission of the Department of Forestry (DOF) is to protect and develop healthy, sustainable forest resources for Virginians. DOF was established in 1914 to prevent and suppress forest fires and reforest bare lands. Since the Department's inception, it has grown and evolved to encompass other protection and management duties including: protecting Virginia's forests from wildfire, protecting

**GSA Response**

**C2-X**

(Response provided on previous page.)

**C2-Y**

Chapter 6 and Table 6.16-1 of the Draft and Supplemental Draft EIS list impact minimization and mitigation measures that would be incorporated into the project, including many that are noted by Virginia Department of Game and Inland Fisheries.

Extensive efforts have been made in the alternatives planning process (refer to Chapter 2 of the Draft and Supplemental Draft EIS) to minimize impacts where feasible. A 100-foot buffer would be maintained around wetlands and streams wherever feasible.

U.S. General Services Administration  
 Draft EIS Foreign Affairs Training Center  
 DEQ 12-189F  
 Page 14

Virginia's waters, managing and conserving Virginia's forests, managing state-owned lands and nurseries, and managing regulated incentive programs for forest landowners.

**8(b) Agency Finding.** The DOF finds that this project will have a significant impact on the forest resources of the Commonwealth from the removal of 525 acres of heavily forested land. This includes areas within identified project parcels LRA 10 and 21/20 that have been determined to have a high forest conservation value (FCV) (4 out of possible 5 ranking) employing the DOF InForest Geographic Information System analysis and evaluation methodology. Virginia has been losing approximately 16,000 acres of forestland annually based on a 10-year average ending in 2010, and urbanization and development represent the single biggest factor in the loss of this forestland acreage.

**8(c) Agency Recommendations.** DOF recommends that GSA develop a forest mitigation plan to support the Governor's goal to conserve 400,000 acres of land by the end of his administration and DOF policy objectives for limiting the rate and degree of forestland loss in the Commonwealth as the project moves forward. DOF welcomes discussions with the Foreign Affairs Security Training Center sponsors concerning potential mitigation plan options for this project.

These options could be structured to help meet DOF forest conservation objectives and complement Department of Defense (DOD) and DGIF species habitat considerations, while simultaneously further enhancing forested national security buffers around sensitive areas within the center's development footprint. Given these objectives, potential opportunities for mitigation include but are not limited to the following:

- **LRA parcel 9, the Grid and 21/20:** Design development footprints for each parcel to maximize the amount of forested area between the sections to be developed and the surrounding undeveloped forest.
  - This suggestion is made to keep forest fragmentation to a minimum and to support DoD and DGIF objectives that the value of the retained forest to interior species is optimized. Of particular interest to DOF is the forest block located on the westernmost portion of LRA Parcel 9 that is considered in the EIS to be large enough to have moderate value to forest interior species and areas within 21/20 that have been determined to have high FCV as determined by the DOF InForest evaluation program.
- **LRA parcel 10:** Submit additional information to DOF about the proposed development footprint for review and comment.
  - The EIS offers only general guidance on development plans and LRA parcel 10 contains high FCV areas. The forest conservation value of LRA parcel 10 is considered high because it is a second growth mixed forest

C2-Z

C2-AA

**GSA Response**

**C2-Z**

The Virginia Department of Forestry's (DOF) determination of significant impact to forest resources is noted. Reducing impacts to vegetation has been a primary planning consideration in the development of the alternatives, and vegetation would be re-planted where feasible to offset the impacts. Forest impacts have been reduced with Build Alternative 3 as compared with the 2012 build alternatives. Refer to Supplemental Draft EIS Sections 2.2.2.2, 4.1.5.3, and 6.4.1 and Tables ES-2 and 6.16-1 for forest impact avoidance, minimization, and mitigation measures that would be incorporated into the design of the project to reduce project impacts to forest and other vegetation communities.

**C2-AA**

GSA would consider additional forest mitigation contingent upon availability of funding. There is no guarantee funding would be available to support the suggested mitigation plan options, but during facility design GSA would incorporate all practicable measures to reduce long term forest impacts and implement mitigation to the extent feasible. Also refer to Response C2-Z.

Sections 4.1.4.3 and 6.3, and Table 6.16-1 of the Draft and Supplemental Draft EIS discuss avoidance, minimization, and mitigation measures for the protection of wetlands and streams on or adjacent to the project site parcels.

U.S. General Services Administration  
 Draft EIS Foreign Affairs Training Center  
 DEQ 12-189F  
 Page 15

that has been subject to very little previous development, it is part of a larger contiguous forest, and its western edge abuts a wetland area that may have water quality value for the adjacent residential areas.

C2-AA

- *State to federal land conversion:* Consult with DOF regarding LRA parcel 9 and LRA parcel 10 (since these parcels will convert to federal land under the preferred build alternative) on the outline of the parcel footprints as the project proceeds through its various phases so forest mitigation efforts can be optimized.

C2-BB

- *Buffer extension:* Coordinate discussion with DOF and Fort Pickett representatives on the possibility of extending the current Army Compatible Use Buffer north of Lunenburg County to provide additional protection for existing forest as well as providing additional security.

C2-CC

- *Forest replacement:* Under the preferred build alternative option, 525 acres of heavily forested land will be lost and DOF would like to see that loss mitigated. Potential opportunities for mitigation include but are not limited to the following recommendations:

- Reforest and protect open federal lands within the Commonwealth of Virginia to create forestlands.
- U.S. Army Fort Pickett, as the landlord installation for the proposed center, could work with DOF or another Virginia conservation agency or group to create a forest land conservation fund that would be used for the purchase of conservation easements or property acquisitions of forestlands. These purchases could be within the impacted area or statewide and would ensure that the forested lands are managed and retained as forest lands in perpetuity.

C2-DD

**9. Geologic Resources.**

**9(a) Agency Jurisdiction.** The DMME, through its six divisions, regulates the mineral industry, provides mineral research and offers advice on wise use of resources. The Department's mission is to enhance the development and conservation of energy and mineral resources in a safe and environmentally sound manner in order to support a more productive economy in Virginia.

**9(b) Agency Comments.** The DMME did not respond to DEQ's request for comments.

C2-EE

For information on geologic resources, contact DMME (David Spears at [David.Spears@dmme.virginia.gov](mailto:David.Spears@dmme.virginia.gov)).

**GSA Response**

**C2-AA**

(Response provided on previous page.)

**C2-BB**

Refer to Response C2-AA

**C2-CC**

Refer to Response C2-AA

**C2-DD**

Refer to Response C2-AA

**C2-EE**

Comment noted.

U.S. General Services Administration  
 Draft EIS Foreign Affairs Training Center  
 DEQ 12-189F  
 Page 16

**10. Historic and Archaeological Resources.** The EIS (page 4-22) states that GSA will comply with Section 106 requirements.

**10(a) Agency Jurisdiction.** DHR conducts reviews of projects to determine their effect on historic structures or cultural resources under its jurisdiction. DHR, as the designated State's Historic Preservation Office, ensures that federal actions comply with Section 106 of the National Historic Preservation Act of 1962 (NHPA), as amended, and its implementing regulation at 36 CFR Part 800. The NHPA requires federal agencies to consider the effects of federal projects on properties that are listed or eligible for listing on the National Register of Historic Places. Section 106 also applies if there are any federal involvements, such as licenses, permits, approvals or funding. DHR also provides comments to DEQ through the state environmental impact report review process.

**10(b) Agency Finding.** DHR states that it has been in consultation with the GSA regarding this project. DHR's detailed comments submitted directly to the GSA are attached for reference. A brief summary of the letter regarding Phase I and II Cultural Resource Surveys follows. DHR states that the architectural surveys meet DHR's Data Sharing System Quality Control Standards. DHR concurs with the GSA's consultant that identified resources are not recommended as individually eligible for listing in the Virginia Landmarks Register (VLR) or the National Register of Historic Places (NRHP). However, one previously surveyed resource (Farley's) along West Entrance Road should be considered potentially eligible. DHR also states that the archaeological resource reports submitted for review meet its requirements. However, DHR states that it does not agree with the consultant that sufficient research has been conducted in connection with the isolated grave stone. DHR also requests additional information on two identified archaeological sites. DHR concludes by stating that it does not plan to comment on effects to historic properties until it receives additional information.

C2-FF

**10(c) Agency Recommendation.** DHR requests that the GSA continue to consult directly with DHR pursuant to Section 106 of the National Historic Preservation Act (as amended) and its implementing regulations codified at 36 CFR Part 800 which require federal agencies to consider the effects of their undertakings on historic properties.

C2-GG

**10(d) Requirement.** The GSA must comply with Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations at 36 CFR 800.

C2-HH

**11. Public Water Supply.** The EIS (pages 4-7 and 4-10) states that the build alternatives would use publicly supplied drinking water.

**GSA Response**

**C2-FF**

Additional research on the isolated grave stone and two identified archaeological sites has been conducted and the updated Phase I and Phase II Archaeological Report and Addendum Phase II Evaluation Report have been updated and resubmitted to DHR. Section 4.2.1 and Appendices E and F of the Supplemental Draft EIS have been updated to include the additional information and correspondence.

**C2-GG**

GSA will continue consultation with DHR pursuant to section 106 of NHPA.

**C2-HH**

Section 4.2.1.3 indicates that compliance with Section 106 would take place and that any mitigation measures would be determined through consultation.

U.S. General Services Administration  
 Draft EIS Foreign Affairs Training Center  
 DEQ 12-189F  
 Page 17

**11(a) Agency Jurisdiction.** The Virginia Department of Health (VDH) Office of Drinking Water (ODW) reviews projects for the potential to impact public drinking water sources (groundwater wells, springs and surface water intakes). VDH administers both federal and state laws governing waterworks operation.

**11(b) Agency Findings.** VDH ODW finds that there are no apparent impacts to public drinking water sources due to this project. No groundwater wells are within a 1-mile radius. No surface water intakes are located within a 5-mile radius of the project site. The project does not fall within Zone 1 (up to 5 miles into the watershed). The project is within Zone 2 (greater than 5 miles into the watershed) of one public surface water source but is outside of VDH's review area.

**11(c) Requirements.**

- Installation of new water lines and appurtenances must comply with the state's waterworks regulations.
- Potential impacts to public water distribution systems must be verified by the local utility, according to VDH.

**11(d) Agency Recommendation.** VDH recommends correcting an error in Chapter 3.2.8.1 under "Utilities and Infrastructure/Potable Water" to reflect that VDH ODW, under the requirements of the Safe Drinking Water Act and the provisions of the Virginia Waterworks Regulations, permits the Town of Blackstone's Water Treatment Plant (Blackstone, Town of; Waterworks ID #VA5135100), instead of DEQ.

**11(e) Water Conservation Recommendations.** DEQ recommends that the GSA considers the following water conservation measures to the extent practicable:

- Grounds should be landscaped with hardy native plant species to conserve water as well as minimize the need to use fertilizers and pesticides.
- Convert turf to low water-use landscaping such as drought resistant grass, plants, shrubs and trees.
- Consider installing low-flow restrictors/aerators to faucets.
- Improve irrigation practices by:
  - upgrading with a sprinkler clock; watering at night, if possible, to reduce evapotranspiration (lawns need only 1 inch of water per week and do not need to be watered daily; over watering causes 85 percent of turf problems);
  - installing a rain shutoff device; and
  - collecting rainwater with a rain bucket or cistern system with drip lines.
- Consider replacement of old equipment with new high-efficiency machines to reduce water usage by 30-50 percent per use.
- Check for and repair leaks during routine maintenance activities.

C2-II

C2-JJ

C2-KK

C2-LL

**GSA Response**

**C2-II**  
 Comment noted

**C2-JJ**  
 All applicable regulations concerning the water lines would be adhered to for the proposed project. Town of Blackstone officials have been notified of the predicted waters demands and have indicated that they have no concerns about the proposed demand. Also refer to Section 4.2.8 of the Draft and Supplemental Draft EIS.

**C2-KK**  
 In the Supplemental Draft EIS, Section 3.2.8.1 has been revised to indicate the Virginia Department of Health Office of Drinking Water permits the water treatment plant.

**C2-LL**  
 As noted in Sections 4.1.4.1, 4.1.4.3, 4.3.1, 5.4.4, and 6.3 of the Draft and Supplemental Draft EIS, LID methods would be utilized to the extent feasible, including but not limited to Sec 438 of the Energy Independence and Security Act, GSA sustainability guidelines, and LEED design criteria. Specific measures that would be incorporated into the design, including ultra-low flow fixtures, rain collection, use of grey water, native plant species for non-irrigated landscaping, and avoidance of permanent irrigation, have been added to Sections 4.2.8.3 and 6.12 and Tables ES-2 and 6.16-1 of the Supplemental Draft EIS.

U.S. General Services Administration  
 Draft EIS Foreign Affairs Training Center  
 DEQ 12-189F  
 Page 18

**12. Sewage Systems.**

**12(a) Discharging Sewer System Regulations.** DEQ has approval authority for most discharging sewage collection systems and treatment works, except for single family home (less than 1,000 gallon per day) systems. This authority is contained in the Sewage Collection and Treatment (SCAT) Regulations (9VAC25-790 *et seq.*). Additional information is available on the DEQ website at [www.deq.virginia.gov/Programs/Water/WastewaterAssistanceTraining/WastewaterEngineering/Regulations.aspx](http://www.deq.virginia.gov/Programs/Water/WastewaterAssistanceTraining/WastewaterEngineering/Regulations.aspx). Construction of sanitary wastewater collection systems must comply with the state's sewerage regulations.

**12(b) Requirements.**

- Contact DEQ BRRO to ensure compliance with the SCAT Regulations, as applicable.
- Potential impacts to sanitary sewage collection systems must be verified by the local utility, according to VDH.

C2-MM

**13. Aviation Impacts.** According to the EIS, the proposed facility is near the Blackstone Army Airfield/Allen C. Perkinson Municipal Airport (page 3-68).

**13(a) Agency Jurisdiction.** The Virginia Department of Aviation (DOAv) is a state agency that plans for the development of the state aviation system; promotes aviation; grants aircraft and airports licenses; and provides financial and technical assistance to cities, towns, counties and other governmental subdivisions for the planning, development, construction and operation of airports, and other aviation facilities.

**13(b) Agency Finding.** DOAv states that it does not object to the project. However, due to the proximity of the proposed transmission lines that will be erected as part of this project to the Allen C. Perkinson/Blackstone Airfield, GSA is required to submit a 7460 Form to the Federal Aviation Administration (FAA) to determine if the proposal will constitute a hazard to air navigation. If the FAA deems the proposed development to be a hazard to air navigation, DOAV would not object to mitigation measures, such as obstruction lights, provided there are no negative impacts to the approach minimums to the airport and the measures will not result in the reduction of runway length.

C2-NN

**13(c) Requirements.**

- Take all efforts to limit the dust/glare generated from this project that could potentially negatively impact aircraft operations.
- Submit 7460 Form to the FAA for review.

C2-OO

**GSA Response**

**C2-MM**

All applicable regulations concerning the sewer collection system would be adhered to for the proposed project. Town of Blackstone officials have been notified of the predicted sewer demands and have indicated that they have no concerns about proposed demand. Sections 4.2.8.1 and 5.4.13 of the Supplemental Draft EIS contain updated information about sewer capacity.

**C2-NN**

Form 7460 would be submitted to the FAA.

**C2-OO**

Form 7460 would be submitted to the FAA. Noted requirements have been added to Sections 4.2.4.1 and 6.8 and Tables ES-2 and 6.16-1 of the Supplemental Draft EIS.

U.S. General Services Administration  
 Draft EIS Foreign Affairs Training Center  
 DEQ 12-189F  
 Page 19

**14. Transportation Impacts.** The EIS (page 4-63) indicates that there would be an increase in traffic but road improvements would be implemented.

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

**14(b) Agency Comments.** VDOT did not respond to DEQ's request for comments. C2-PP

**15. Agricultural Lands.** The EIS (pages 4-4 and 4-5) states that the build alternatives would impact 20 acres of prime farmland soils, but the impact would not be significant based on site assessment criteria and coordination with the Natural Resources Conservation Service.

**15(a) Agency Jurisdiction.** The 2001 Virginia General Assembly established the Office of Farmland Preservation within VDACS to help reduce the loss of agricultural land.

**15(b) Agency Comments.** VDACS did not respond to DEQ's request for comments. C2-QQ

**15(c) Recommendation.** Coordinate the proposed development with VDACS (*Keith.Tignor@vdacs.virginia.gov*). C2-RR

**16. Pollution Prevention.** DEQ advocates that principles of pollution prevention be used in all construction projects as well as in facility operations. Effective siting, planning, and on-site Best Management Practices (BMPs) will help to ensure that environmental impacts are minimized. However, pollution prevention techniques also include decisions related to construction materials, design, and operational procedures that will facilitate the reduction of wastes at the source. C2-SS

**16(a) Recommendations.** We have several pollution prevention recommendations that may be helpful in constructing or operating this project:

- Consider development of an effective Environmental Management System (EMS). An effective EMS will ensure that the proposed facility is committed to minimizing its environmental impacts, setting environmental goals, and achieving improvements in its environmental performance. DEQ offers EMS development assistance and recognizes facilities with effective Environmental Management Systems through its Virginia Environmental Excellence Program.
  - Consider environmental attributes when purchasing materials. For example, the extent of recycled material content, toxicity level, and amount of
- C2-TT

**GSA Response**

**C2-PP**

VDOT submitted comments under a separate letter. Refer to comments and responses C1-A through C1-P.

**C2-QQ**

Comment noted.

**C2-RR**

Comment noted.

**C2-SS**

Chapter 6 and Table 6.16-1 of the Draft and Supplemental Draft EIS discuss impact minimization and mitigation measures including pollution prevention. The description of the Proposed Action (Section 2.1) addresses energy efficiency and reduction of waste, pollution, and environmental impacts to achieve certification of LEED Silver buildings. Pollution prevention principles are also incorporated into GSA Sustainable Design Principles.

**C2-TT**

Comment noted; also refer to response C2-SS.

U.S. General Services Administration  
 Draft EIS Foreign Affairs Training Center  
 DEQ 12-189F  
 Page 20

packaging should be considered and can be specified in purchasing contracts.

- Consider contractors' commitment to the environment when choosing contractors. Specifications regarding raw materials and construction practices can be included in contract documents and requests for proposals.
- Choose sustainable materials and practices for building construction and design.
- Integrate pollution prevention techniques into the facility maintenance and operation, to include inventory control for centralized storage of hazardous materials. Maintenance facilities should have sufficient and suitable space to allow for effective inventory control and preventive maintenance.

C2-TT

DEQ's Office of Pollution Prevention provides information and technical assistance relating to pollution prevention techniques and EMS. If interested, please contact DEQ (Sharon Baxter at 804-698-4344).

**17. Regional and Local Comments.** The Richmond Regional Commission, Crater Planning District Commission, Commonwealth Regional Commission, Southside Planning District Commission, Nottoway County, Town of Blackstone, Amelia County, Prince Edward County, Brunswick County, Chesterfield County, Dinwiddie County and Lunenburg County were invited to comment.

**17(a) Agency Jurisdiction.** In accordance with the Code of Virginia, Section 15.2-4207, planning district commissions encourage and facilitate local government cooperation and state-local cooperation in addressing, on a regional basis, problems of greater than local significance. The cooperation resulting from this is intended to facilitate the recognition and analysis of regional opportunities and take account of regional influences in planning and implementing public policies and services. Planning district commissions promote the orderly and efficient development of the physical, social and economic elements of the districts by planning, and encouraging and assisting localities to plan, for the future.

**17(b) Comments.**

- Lunenburg County states that it supports the project.
- Prince Edward County has no comments.
- Nottoway County states that as this facility will be entirely contained within the county, its impacts are of special interest to its citizens and elected leaders. Despite the size and complexity of the project, the county states that its review of the EIS has not shown any potential impacts to be problematic for Nottoway County. It also appears to have no negative impacts to the surrounding area. The

C2-UU

**GSA Response**

**C2-TT**

(Response provided on previous page.)

**C2-UU**

Comment noted.

U.S. General Services Administration  
 Draft EIS Foreign Affairs Training Center  
 DEQ 12-189F  
 Page 21

Board of Supervisors is unanimous in its support of the draft EIS and the project as presented.

- o The Crater Planning District Commission finds the proposal to be in full accord with the commission's environmental policy directives.
- o The Richmond Regional Planning District Commission states that it defers comments to other planning district commissions and localities since the project site is outside of its boundary.

C2-UU

Commonwealth Regional Commission, Southside Planning District Commission, Town of Blackstone, Amelia County, Brunswick County, Chesterfield County, and Dinwiddie County did not respond to DEQ's request for comments.

**REGULATORY AND COORDINATION NEEDS**

**1. Subaqueous Lands.** The Virginia Marine Resources Commission (VMRC), pursuant to Virginia Code § 28.2-1200 through 1400, regulates encroachments in, on or over any state-owned bays, rivers, streams or creeks throughout the Commonwealth. For information on permits issued by the VMRC and on submitting a JPA, contact the VMRC Habitat Management Division (Tony Watkinson at 757-247-2250 or [Tony.Watkinson@mrc.virginia.gov](mailto:Tony.Watkinson@mrc.virginia.gov)).

C2-VV

**2. Water Quality.** GSA should ensure compliance with the Virginia Water Protection (VWP) Program pursuant to Virginia Code §62.1-44.15:20 *et seq.* and Virginia regulations 9VAC25-210-10 *et seq.* Contact DEQ BRRO (Kip Foster at [Kip.Foster@deq.virginia.gov](mailto:Kip.Foster@deq.virginia.gov)) if impacts to wetlands or streams are proposed to ensure compliance with the VWP Program.

C2-WW

**3. Air Quality Regulations.** According to the DEQ Air Division, the following regulations may apply:

- 9VAC5-50-60 *et seq.* of the regulations governing fugitive dust.
- 9VAC5-130 *et seq.* of the regulations governing open burning.

C2-XX

For information on local requirements pertaining to open burning, contact Nottoway County.

**3(a) Fuel-burning Equipment.** Contact DEQ BRRO (David Jed Brown at 434-582-6210 or [David.Brown@deq.virginia.gov](mailto:David.Brown@deq.virginia.gov)) for potential requirements related to registration of new equipment, as applicable.

C2-YY

**GSA Response**

**C2-UU**

(Response provided on previous page.)

**C2-VV**

Refer to response C2-A.

**C2-WW**

Refer to response C2-D.

**C2-XX**

Refer to responses C2-J and C2-K.

**C2-YY**

Refer to response C2-L.

U.S. General Services Administration  
 Draft EIS Foreign Affairs Training Center  
 DEQ 12-189F  
 Page 22

**4. Erosion and Sediment Control and Stormwater Management.**

**4(a) Erosion and Sediment Control.** If this project will disturb equal to or greater than 10,000 square feet on public or private lands, the property owner must submit a project-specific erosion and sediment control plan to the DCR Southern Piedmont Office at (434) 210-0287 (Reference: VESCL §10.1-563; VESCR §4VAC50-30-30, §4VAC50-30-40).

C2-ZZ

**4(b) General Permit for Stormwater Discharges from Construction Activities.** For projects involving land-disturbing activities equal to or greater than 1 acre, the owner or operator of construction activities are required to apply for registration coverage under the General Permit for Discharges of Stormwater from Construction Activities and develop a project-specific stormwater pollution prevention plan (SWPPP). The SWPPP must address water quality and quantity in accordance with the Virginia Stormwater Management Program (VSMP) Permit Regulations. Specific questions regarding the Stormwater Management Program requirements should be directed to Holly Sepety with DCR at (804) 225-2613 (Reference: VSWML §10.1-603.1 *et seq.*; VSMP Permit Regulations §4VAC-50 *et seq.*).

C2-AAA

**5. Solid Waste and Hazardous Substances.** All solid waste, hazardous waste, and hazardous materials must be managed in accordance with all applicable federal, state, and local environmental regulations.

Applicable state regulations may include:

- Virginia Waste Management Act (*Code of Virginia* section 10.1-1400 *et seq.*);
- Virginia Hazardous Waste Management Regulations (VHWMR) (9VAC20-60);
- Virginia Solid Waste Management Regulations (VSWMR) (9VAC20-81); and
- Virginia Regulations for the Transportation of Hazardous Materials (9VAC20-110).

C2-BBB

Applicable federal regulations may include:

- Resource Conservation and Recovery Act (RCRA) (42 U.S.C. section 6901 *et seq.*), and the applicable regulations contained in Title 40 of the Code of Federal Regulations; and
- U.S. Department of Transportation Rules for Transportation of Hazardous Materials, 49 CFR Parts 107, 171.1-172.558.

For additional information on waste management, contact DEQ BRRO (Aziz Farahmand at 540-562-6872 or Aziz.Farahmand@deq.virginia.gov).

**5(a) Asbestos-Containing Material.** It is the responsibility of the owner or operator of a renovation or demolition activity, prior to the commencement of the renovation or

C2-CCC

**GSA Response**

**C2-ZZ**

Refer to response C2-G.

**C2-AAA**

Refer to response C2-H.

**C2-BBB**

Solid waste, hazardous waste, and hazardous materials would be managed in accordance with all applicable federal, state, and local regulations.

**C2-CCC**

Refer to response C2-O.

U.S. General Services Administration  
 Draft EIS Foreign Affairs Training Center  
 DEQ 12-189F  
 Page 23

demolition, to thoroughly inspect the affected part of the facility where the operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos-containing material (as applicable). Upon classification as friable or non-friable, all asbestos-containing material shall be disposed of in accordance with the Virginia Solid Waste Management Regulations (9VAC20-81-640) and transported in accordance with the Virginia regulations governing Transportation of Hazardous Materials (9VAC20-110-10 *et seq.*). Contact the DEQ Division of Land Protection and Revitalization (formerly the Waste Division) (Linda Richardson at 804-698-4318) and the Department of Labor and Industry (Ronald L. Graham 804-371-0444) for additional information.

C2-CCC

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

C2-DDD

**5(c) Coordination.**

- Contact the U.S. Environmental Protection Agency (EPA) (Jerry Hoover, Regional Project Manager, at 215-814-2077) for information concerning Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) obligations at Fort Pickett's Main Post, including establish the nature and extent of any known environmental contamination at or near Fort Pickett, or other Areas of Concern (AOCs) which may be in close proximity to the proposed project.
- Conduct the removal, relocation or closure of any regulated petroleum storage tanks – aboveground storage tanks (ASTs) or underground storage tank (USTs) –in accordance with the requirements of the Virginia Tank Regulations 9VAC25-91-10 *et seq.* for ASTs and 9VAC25-580-10 *et seq.* for USTs. Documentation and / or questions should be submitted to DEQ BRRO (David Miles at 540-562-6741 or [David.Miles@deq.virginia.gov](mailto:David.Miles@deq.virginia.gov)).
- Report the installation or use of any portable aboveground petroleum storage tank (> 660 gallons, 9VAC 25-91-10 *et seq.*) for more than 120 days the DEQ BRRO Petroleum Storage Tank Program (David Miles at 540-562-6741 or [David.Miles@deq.virginia.gov](mailto:David.Miles@deq.virginia.gov)).

C2-EEE

**6. Protected Species and Natural Heritage Resources.**

- Coordinate survey results for Michaux's sumac with DCR DNH (Rene Hypes at [Rene.Hypes@dcr.virginia.gov](mailto:Rene.Hypes@dcr.virginia.gov) or 804-371-2708) and FWS (Cindy Schulz at 804-693-6694 or [cindy\\_schulz@fws.gov](mailto:cindy_schulz@fws.gov)).

C2-FFF

**GSA Response**

**C2-CCC**

(Response provided on previous page.)

**C2-DDD**

Section 4.2.11.1 of the Draft and Supplemental Draft EIS indicates that LBP would be characterized, managed, transported, and disposed of according to applicable state, federal, and local requirements for protecting human health and safety and the environment.

**C2-EEE**

Refer to response C2-P and C2-R.

**C2-FFF**

Refer to response C2-T.

U.S. General Services Administration  
 Draft EIS Foreign Affairs Training Center  
 DEQ 12-189F  
 Page 24

- Coordinate with DHR DNH (J. Christopher Ludwig, Natural Heritage Inventory Manager, at [chris.ludwig@dcr.virginia.gov](mailto:chris.ludwig@dcr.virginia.gov) or 804-371-6206) since its biologists are qualified and available to conduct inventories for rare, threatened, and endangered species and to discuss arrangements for field work.
- Coordinate with VDACS (Keith Tignor at 804-786-8938 or [Keith.Tignor@vdacs.virginia.gov](mailto:Keith.Tignor@vdacs.virginia.gov)) to ensure protection of state-listed plant species and compliance with state protected species legislation.
- Contact the FWS (Cindy Schulz at 804-693-6694 or [cindy\\_schulz@fws.gov](mailto:cindy_schulz@fws.gov)) to ensure the protection of any federally-listed species and compliance with federal protected species legislation.
- DGIF's database may be accessed at <http://vafwis.org/fwis/> or by contacting DGIF (Shirl Dressler at 804-367-6913).
- Contact the DCR DNH (804-371-2708) for an update on natural heritage information if a significant amount of time passes before the project is implemented.

C2-FFF

**7. Historic and Archaeological Resources.** Continue to coordinate with DHR (Andrea Kampinen at [Andrea.Kampinen@dhr.virginia.gov](mailto:Andrea.Kampinen@dhr.virginia.gov) and Ethel Eaton at 804-482-6088 or [Ethel.Eaton@dhr.virginia.gov](mailto:Ethel.Eaton@dhr.virginia.gov)) as required by Section 106 of the National Historic Preservation Act.

C2-GGG

**8. Forest Resources.** Consider mitigation options regarding the loss of forest lands and coordinate with DOF (Greg Evans, DOF Voluntary Mitigation Program Manager, at 434-220-9020 or at [Gregory.Evans@dof.virginia.gov](mailto:Gregory.Evans@dof.virginia.gov)) regarding its mitigation recommendations and request for additional information.

C2-HHH

**9. Aviation Impacts.** Coordinate with the FAA Airport District Office (703-661-1354) regarding Form 7460-1 to ensure compliance with federal regulations or guidelines. Contact DOAv (Scott Denny at [Scott.Denny@doav.virginia.gov](mailto:Scott.Denny@doav.virginia.gov) or 804-236-3632) for additional information and coordination as necessary.

C2-III

**10. Waterworks and Sewerage Regulations.**

- All utility work involving installation of new waterlines and appurtenances must comply with the Commonwealth's waterworks regulations and all applicable standards of the locality.
- Potential impacts to public water distribution systems must be verified by the local utility, according to VDH. Contact VDH (Barry Matthews at [Barry.Matthews@vdh.virginia.gov](mailto:Barry.Matthews@vdh.virginia.gov)) for additional information.
- Contact DEQ BRRO (Kip Foster at 540-562-6782 or [Kip.Foster@deq.virginia.gov](mailto:Kip.Foster@deq.virginia.gov)) to ensure compliance with the Sewage Collection and Treatment (SCAT) Regulations, as applicable.

C2-JJJ

**GSA Response**

**C2-FFF**

(Response provided on previous page.)

**C2-GGG**

Refer to response C2-GG.

**C2-HHH**

Refer to response C2-AA.

**C2-III**

Refer to response C2-NN.

**C2-JJJ**

Refer to responses C2-JJ and C2-MM.

U.S. General Services Administration  
Draft EIS Foreign Affairs Training Center  
DEQ 12-189F  
Page 25

Thank you for the opportunity to comment on the draft EIS. Detailed comments of reviewing agencies are attached for your review. If you have questions, please do not hesitate to call me at (804) 698-4325 or Julia Wellman at (804) 698-4326.

Sincerely,



Ellie Irons, Program Manager  
Environmental Impact Review

Enclosures

ec: Dennis Morris, Crater PDC  
Robert A. Crum, Richmond Regional PDC  
Mary Hickman, Commonwealth Regional Council  
Gail Moody, Southside PDC  
James Stegmaier, Chesterfield County  
Wade Bartlett, Prince Edward County  
Tracy Gee, Lunenburg County  
John N. Prosis, Nottoway County  
Taylor Harvey, Amelia County  
Charlette T. Woolridge, Brunswick County  
Kevin Massengill, Dinwiddie County  
Phillip Vannoorbeeck, Town of Blackstone  
Amy Ewing, DGIF  
Keith Tignor, VDACS  
Robbie Rhur, DCR  
Barry Matthews, VDH  
Steve Coe, DEQ DLPR  
Kotur Narasimhan, DEQ DAPC  
Mick Cholko, DEQ BRRO  
Roger Kirchen, DHR  
Jay Woodward, VMRC  
Jim Cromwell/Chip Ray, VDOT  
David Spears, DMME  
Buck Kline, DOF  
Greg Evans, DOF  
Scott Denny, DOAV  
Cotton Puryear, Department of Military Affairs  
Ronnie Rice, Department of State Police

**GSA Response**

No response necessary on this page.

U.S. General Services Administration  
Draft EIS Foreign Affairs Training Center  
DEQ 12-189F  
Page 26

John Cavan, Southside VA Community College  
Carol Wilkinson, Southern Piedmont Agricultural REC  
Brian Murphy, Conservation Management Institute

**GSA Response**

No response necessary on this page.

**Wellman, Julia (DEQ)**

**From:** Woodward, Jay (MRC)  
**Sent:** Friday, November 02, 2012 10:33 AM  
**To:** Wellman, Julia (DEQ)  
**Subject:** DEIS for Foreign Affairs Security Training Center, Nottoway County, Virginia (October 2012)

Julia,

We have reviewed the subject document and would like to provide the following comments:

Any activities or construction within perennial streams draining 5 square miles or greater would need to be reviewed for potential authorization from the Virginia Marine Resources Commission. The submerged lands under these waterways are considered to be public, state-owned property and we are the agency who manages those submerged lands. While I was unable to determine if there are to be any direct impacts to these jurisdictional lands, please be advised that if there are proposed impacts, a Joint Permit Application would need to be completed and submitted to us for our review and possible permit issuance through our public interest review process. Here is a link to the application website:

C2-  
KKK

[http://www.nap.usace.army.mil/Portals/31/docs/regulatory/RPSPdocs/Revised\\_Standard\\_JPA\\_JULY2012\\_FillableForm.pdf](http://www.nap.usace.army.mil/Portals/31/docs/regulatory/RPSPdocs/Revised_Standard_JPA_JULY2012_FillableForm.pdf)

Thank you for the opportunity to comment and should you have any questions please feel free to contact me directly as I am the Environmental Engineer assigned to this area of the state.

Jay Woodward  
Environmental Engineer  
Habitat Management Division  
Virginia Marine Resources Commission  
(757) 247-8032 office  
(757) 504-7009 mobile  
[jay.woodward@mrc.virginia.gov](mailto:jay.woodward@mrc.virginia.gov)  
Website: [www.mrc.virginia.gov](http://www.mrc.virginia.gov)

**GSA Response**

**C2-KKK**

Refer to response C2-A.

DEPARTMENT OF ENVIRONMENTAL QUALITY  
DIVISION OF AIR PROGRAM COORDINATION

ENVIRONMENTAL REVIEW COMMENTS APPLICABLE TO AIR QUALITY

TO: Julia H. Wellman DEQ - OEIA PROJECT NUMBER: 12-189F

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

CONSISTENCY CERTIFICATION

PROJECT TITLE: FOREIGN AFFAIRS TRAINING CENTER

PROJECT SPONSOR: U. S. GENERAL SERVICE ADMINISTRATION

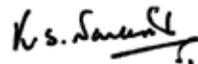
PROJECT LOCATION:  OZONE ATTAINMENT AREA

REGULATORY REQUIREMENTS MAY BE APPLICABLE TO:  CONSTRUCTION  
 OPERATION

STATE AIR POLLUTION CONTROL BOARD REGULATIONS THAT MAY APPLY:

1.  9 VAC 5-40-5200 C & 9 VAC 5-40-5220 E - STAGE I
2.  9 VAC 5-40-5200 C & 9 VAC 5-40-5220 F - STAGE II Vapor Recovery
3.  9 VAC 5-40-5490 et seq. - Asphalt Paving operations
4.  9 VAC 5-130 et seq. - Open Burning
5.  9 VAC 5-60-60 et seq. Fugitive Dust Emissions
6.  9 VAC 5-50-130 et seq. - Odorous Emissions; Applicable to \_\_\_\_\_
7.  9 VAC 5-50-160 et seq. - Standards of Performance for Toxic Pollutants
8.  9 VAC 5-50-400 Subpart \_\_\_\_\_, Standards of Performance for New Stationary Sources, designates standards of performance for the \_\_\_\_\_
9.  9 VAC 5-80-1100 et seq. of the regulations - Permits for Stationary Sources
10.  9 VAC 5-80-1700 et seq. Of the regulations - Major or Modified Sources located in PSD areas. This rule may be applicable to the \_\_\_\_\_
11.  9 VAC 5-80-2000 et seq. of the regulations - New and modified sources located in non-attainment areas
12.  9 VAC 5-80-800 et seq. Of the regulations - Operating Permits and exemptions. This rule may be applicable to \_\_\_\_\_

COMMENTS SPECIFIC TO THE PROJECT:



(Kotur S. Narasimhan)  
Office of Air Data Analysis

DATE: November 9, 2012

**GSA Response**

No response necessary on this page.

**Wellman, Julia (DEQ)**

**From:** Choiko, Michael (DEQ)  
**Sent:** Wednesday, November 14, 2012 3:58 PM  
**To:** Wellman, Julia (DEQ)  
**Subject:** 12-189F Foreign Affairs Security Training Center - Nottoway County/Fort Pickett

Only issue we saw was under 4.1.4.1 (page 4-8) "Wetlands":

Text states US General Services Administration would have to obtain a permit from USACE for wetlands and stream impacts under CWA Sections 404 and 401. According to our VWP person (Mark Bushing), they also need to coordinate these permits with DEQ, not solely with Corps of Engineers. C2-LLL

Michael F. Cholko  
Pollution Response Coordinator / Environmental Impact Review Coordinator  
Virginia Department of Environmental Quality  
Blue Ridge Regional Office - Lynchburg  
7705 Timberlake Road  
Lynchburg, VA 24502  
434-582-6236  
434-582-5125 (fax)  
[mfcholko@deq.virginia.gov](mailto:mfcholko@deq.virginia.gov)

**GSA Response**

**C2-LLL**

Refer to response C2-D.



**MEMORANDUM**

**TO:** Julia Wellman, DEQ/EIR Environmental Program Planner  
**FROM:** Steve Coe, Division of Land Protection & Revitalization Review Coordinator  
**DATE:** November 14, 2012  
**COPIES:** Sanjay Thirunagari, DLP&R Review Manager  
 EIR File  
**SUBJECT:** EIR – No. 12-189FS - Foreign Affairs Training Center Fort Pickett, Nottoway County, VA 23824 –DEQ Review

The Division of Land Protection & Revitalization has completed its review of the Environmental Impact Report for the Foreign Affairs Training Center Fort Pickett, Nottoway County, VA 23824. Project description: acquisition of land and the development of a consolidated Foreign Affairs Security Training Center (FASTC) in Nottoway County.

We have the following comments concerning the waste issues associated with this project:

The report submitted for the EIR addressed potential solid waste and/or hazardous waste issues. The report indicates a thorough review of potential environmental issues related to the parcels identified for development. The report appears to indicate that DEQ's databases and DLPR files were searched, and indicates that DEQ offices had been contacted about possible ground contamination concerns. The DLPR staff has conducted a cursory review of its database files under zip code 23824 including a VEGIS database search (within a 0.5 mile radius) of the project site and identified the information below. DEQ's Federal Facilities Program was contacted for a review of this determination and staff comments are included in our review. The sites identified are for reference as their proximity to the subject site is unknown.

**RCRA/Hazardous Waste Facilities** - fifteen in zip code 23824, five in close proximity to the identified parcels

- 1) BRAC Property Fort Pickett, 403 Military Road, Blackstone, VA 23824. ID# 0213720931. Contact: Francis Gilmore at 434-292-3317.
- 2) Fort Pickett USARC AMSA No. 88, Bldg 564 Kemper Avenue, Blackstone, VA 23824. ID# VAR000005553. Contact: Michele Brown at 804-233-6473.
- 3) MTC Fort Pickett, VAARNG-FM-E, Bldg 234, Blackstone, VA 23824. ID# VAD988228359. Contact: David K. Short at 434-292-2144.
- 4) VAARNG-ARMORY-Blackstone, N. High Street, Blackstone, VA 23824. ID# VAD982677429. Contact: Pamela W. Coleman at 434-298-6445.
- 5) VIP & SU Southern Piedmont AES, Highway 40 East, Blackstone, VA 23824. ID# 988224937. Contact: Jack Nunes at 540-231-8758.

C2-MMM

**GSA Response**

**C2-MMM**

Refer to response C2-N.

**CERCLA Sites – one**

Fort Pickett, Kemper Avenue, Blackstone, VA 23824. EPA ID 2210020705. Not NPL.

The following websites may prove helpful in locating additional information for these identification numbers: <http://www.epa.gov/superfund/sites/cursites/index.htm> or [http://www.epa.gov/enviro/html/rcris/rcris\\_query\\_java.html](http://www.epa.gov/enviro/html/rcris/rcris_query_java.html).

**FUDs Sites – two**

FUDS#	FFID	Property Name	Locality	INPR Results	Hazards Found
C03VA0028	VA9799F7770	Fort Picket Mil Resv	Blackstone,	E	N
C03VA0220	VA9899F1674	Ft Pickett A ARPT	Blackstone	E	Y

The DEQ's Federal Facilities Restoration Program reviewed this submittal and it appears that the project will not impact any sites at Fort Pickett (Environmental Restoration Program, Base Realignment and Closure, and Formerly Used Defense Sites). If the project manager or engineer has questions, they should contact Mr. Jerry Hoover, Regional Project Manager, at (215) 814-2077 for information concerning Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) obligations at Fort Pickett's Main Post. Mr. Hoover, or his designee, should be contacted to establish the nature and extent of any known environmental contamination at or near Fort Pickett, or other Areas of Concern (AOCs) which may be in close proximity to the proposed project.

**Solid Waste Facilities – one**

SWP333 – U.S. Army Fort Pickett, Closed Sanitary Landfill, Rives Road at 9<sup>th</sup> Street, Blackstone, VA 23824.

**VRP Sites -none**

**Petroleum Release Sites – one**

ID# 20112039 – Grant Residence, 39 Maple Lane, Blackstone, VA 23824. Event Date: 10/25/2010. Status: Closed.

**GENERAL COMMENTS**

**Soil, Sediment, and Waste Management**

Any soil that is suspected of contamination or wastes that are generated must be tested and disposed of in accordance with applicable Federal, State, and local laws and regulations. Some of the applicable state laws and regulations are: Virginia Waste Management Act, Code of Virginia Section 10.1-1400 *et seq.*; Virginia Hazardous Waste Management Regulations (VHWMR) (9VAC 20-60); Virginia Solid Waste Management Regulations (VSWMR) (9VAC 20-81); Virginia Regulations for the Transportation of Hazardous Materials (9VAC 20-110). Some of the applicable Federal laws and regulations are: the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Section 6901 *et seq.*, and the applicable regulations contained in Title 40

**GSA Response**

**C2-MMM**

(Response provided on previous page.)

**C2-NNN**

Refer to Response C2-P.

C2-MMM

C2-NNN

<p>of the Code of Federal Regulations; and the U.S. Department of Transportation Rules for Transportation of Hazardous Materials, 49 CFR Part 107. C2-NNN</p> <p>Also, all structures being demolished/renovated/ removed should be checked for asbestos-containing materials (ACM) and lead-based paint (LBP) prior to demolition. If ACM or LBP are found, in addition to the federal waste-related regulations mentioned above, State regulations 9VAC 20-80-640 for ACM and 9VAC 20-60-261 for LBP must be followed. The local DEQ office contact for questions is Mr. Kyle Winter at (804) 527-5052. C2-000</p> <p>Please note that any contaminated media which is generated from the facility project site is the responsibility of the subject site facility which must ensure that contaminated media undergoes proper management, storage, treatment, and disposal in accordance with the above noted State Regulations. Questions regarding the proper management of solid and/or hazardous waste as well as dredge spoils should be directed to the DEQ's Piedmont Regional Office (<a href="http://www.deq.virginia.gov/regions/piedmont.html">http://www.deq.virginia.gov/regions/piedmont.html</a>). C2-PPP</p> <p><b><u>Pollution Prevention – Reuse - Recycling</u></b></p> <p>Please note that DEQ encourages all construction projects and facilities to implement pollution prevention principles, including the reduction, reuse, and recycling of all solid wastes generated. All generation of hazardous wastes should be minimized and handled appropriately. C2-QQQ</p> <p>If you have any questions or need further information, please contact Steve Coe at (804) 698-4029.</p>	<p><b>GSA Response</b></p> <p><b>C2-NNN</b> (Response provided on previous page.)</p> <p><b>C2-000</b> Refer to Response C2-O.</p> <p><b>C2-PPP</b> Sections 4.2.11.1 and 6.15 of the Draft and Supplemental Draft EIS discuss measures for the storage, handling, and disposal of hazardous materials.</p> <p><b>C2-QQQ</b> Refer to response C2-SS.</p>
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Douglas W. Domenech  
Secretary of Natural Resources



David A. Johnson  
Director

**COMMONWEALTH of VIRGINIA**  
DEPARTMENT OF CONSERVATION AND RECREATION

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

**MEMORANDUM**

DATE: November 14, 2012  
TO: Julia Wellman, DEQ  
FROM: Roberta Rhur, Environmental Impact Review Coordinator  
SUBJECT: DEQ 12-189F, Foreign Affairs Training Center, Fort Pickett

Division of Natural Heritage

The Department of Conservation and Recreation's Division of Natural Heritage (DCR) has searched its Biotics Data System for occurrences of natural heritage resources from the area outlined on the submitted map. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.

According to the information we have currently in our files, the Fort Pickett Impact Area is within the project vicinity. Conservation sites are tools for representing key areas of the landscape that warrant further review for possible conservation action because of the natural heritage resources and habitat they support. Conservation sites are polygons built around one or more rare plant, animal, or natural community designed to include the element and, where possible, its associated habitat, and buffer or other adjacent land thought necessary for the element's conservation. Conservation sites are given a biodiversity significance ranking based on the rarity, quality, and number of element occurrences they contain; on a scale of 1-5, 1 being most significant. Fort Pickett Impact Area Conservation Site has been given a biodiversity significance ranking of B1, which represents a site of outstanding significance. The natural heritage resource of concern at this site is:

*Rhus michauxii* Michaux's sumac G2G3/S1/LE/LT

Michaux's sumac is a dioecious shrub that grows from 0.3 – 0.6 m tall (NatureServe 2011). This plant occurs in sandy or rocky, open, hardwood-dominated forests and savannas (Van Alstine and Smith, 1995), sometimes in association with circumneutral soils. It is dependent upon some form of disturbance to maintain its open habitat (NatureServe 2011). Periodic, naturally occurring fires provided such disturbance historically; however, today many of this plant's occurrences are in areas artificially disturbed such as highway, powerline and railroad rights-of-way, edges of cultivated fields, and other cleared lands. In Virginia, all but one of the known occurrences are located within Fort Pickett in the southern Piedmont where it is maintained by frequent fires. The major threats to Michaux's sumac include fire suppression and habitat degradation (NatureServe 2011). The optimal survey time period for Michaux's sumac is

C2-RRR

*State Parks • Stormwater Management • Natural Heritage • Outdoor Recreation Planning  
Dam Safety and Floodplain Management • Land Conservation*

**GSA Response**

**C2-RRR**

Refer to response C2-S.

<p>during the period of flowering / fruiting from June 1 – October 31 when the plant has higher visibility, but the plant can be identified as long as the leaves are present from May 1 – October 31. C2-RRR</p> <p>Please note that this species is currently classified as endangered by the United States Fish and Wildlife Service (USFWS) and listed as threatened by the Virginia Department of Agriculture and Consumer Services (VDACS).</p> <p>Due to the potential for this site to support populations of Michaux's sumac, DCR recommends an inventory for the resource in the study area. With the survey results we can more accurately evaluate potential impacts to natural heritage resources and offer specific protection recommendations for minimizing impacts to the documented resources.</p> <p>DCR-Division of Natural Heritage biologists are qualified and available to conduct inventories for rare, threatened, and endangered species. Please contact J. Christopher Ludwig, Natural Heritage Inventory Manager, at <a href="mailto:chris.ludwig@dcr.virginia.gov">chris.ludwig@dcr.virginia.gov</a> or 804-371-6206 to discuss arrangements for field work. A list of other individuals who are qualified to conduct inventories may be obtained from the USFWS. C2-SSS</p> <p>Under a Memorandum of Agreement established between the VDACS and the DCR, DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species. Survey results should be coordinated with DCR-DNH and USFWS. Upon review of the results, if it is determined the species is present, and there is a likelihood of a negative impact on the species, DCR-DNH will recommend coordination with VDACS to ensure compliance with Virginia's Endangered Plant and Insect Species Act. C2-TTT</p> <p>There are no State Natural Area Preserves under DCR's jurisdiction in the project vicinity. C2-TTT</p> <p>New and updated information is continually added to Biotics. Please contact DCR for an update on this natural heritage information if a significant amount of time passes before it is utilized.</p> <p>The Virginia Department of Game and Inland Fisheries (VDGIF) maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters that may contain information not documented in this letter. Their database may be accessed from <a href="http://vafwis.org/fwjs/">http://vafwis.org/fwjs/</a> or contact Gladys Cason (804-367-0909 or <a href="mailto:Gladys.Cason@dgif.virginia.gov">Gladys.Cason@dgif.virginia.gov</a>).</p> <p><u>Division of Stormwater Management</u></p> <p><u>Stormwater Management:</u> The applicant and their authorized agents conducting regulated land disturbing activities on private and public lands in the state must comply with the Virginia Erosion and Sediment Control Law and Regulations (VESCL&amp;R), Virginia Stormwater Management Law and Regulations including coverage under the general permit for stormwater discharge from construction activities, and other applicable federal nonpoint source pollution mandates (e.g. Clean Water Act-Section 313, Federal Consistency under the Coastal Zone Management Act). Clearing and grading activities, installation of staging areas, parking lots, roads, buildings, utilities, borrow areas, soil stockpiles, and related land-disturbance activities that result in the land-disturbance of equal to or greater than 10,000 square feet would be regulated by VESCL&amp;R. Accordingly, the applicant must prepare and implement erosion and sediment control (ESC) plan to ensure compliance with state law and regulations. The applicant is ultimately responsible for achieving project compliance through oversight of on site contractors, regular field inspection, prompt action against non-compliant sites, and other mechanisms consistent with agency policy. [Reference: VESCL §10.1-567;]. C2-UUU</p>	<p><b>GSA Response</b></p> <p><b>C2-RRR</b> (Response provided on previous page.)</p> <p><b>C2-SSS</b> Refer to Response C2-T.</p> <p><b>C2-TTT</b> Comment noted.</p> <p><b>C2-UUU</b> Refer to responses C2-G and C2-H.</p>
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<p>The operator or owner of construction activities involving land disturbing activities equal to or greater than one acre are required to register for coverage under the General Permit for Discharges of Stormwater from Construction Activities and develop a project specific stormwater pollution prevention plan (SWPPP). Construction activities requiring registration also includes the land-disturbance of less than one acre of total land area that is part of a larger common plan of development or sale if the larger common plan of development will ultimately disturb equal to or greater than one acre. The SWPPP must be prepared prior to submission of the registration statement for coverage under the general permit and the SWPPP must address water quality and quantity in accordance with the Virginia Stormwater Management Program (VSMP) Permit Regulations. General information and registration forms for the General Permit are available on DCR's website at <a href="http://www.dcr.virginia.gov/soil_and_water/index.shtml">http://www.dcr.virginia.gov/soil_and_water/index.shtml</a> [Reference: Virginia Stormwater Management Law Act §10.1-603.1 et seq.; VSMP Permit Regulations §4VAC-50 et seq.]</p> <p>The remaining DCR divisions have no comments regarding the scope of this project. Thank you for the opportunity to comment.</p> <p>CC: Kim Smith, USFWS</p> <p>Literature Cited</p> <p>NatureServe. 2011. NatureServe Explorer: An online encyclopedia of life [web application]. Version 7.1. NatureServe, Arlington, Virginia. Available <a href="http://www.natureserve.org/explorer">http://www.natureserve.org/explorer</a>. (Accessed: November 29, 2011).</p> <p>Van Alstine, N.E. and T.L. Smith. 1995. Distribution of <i>Rhus michauxii</i> of Fort Pickett, Virginia. Natural Heritage Technical Report 95-15. Virginia Department of Conservation and Recreation, Division</p>	<p><b>GSA Response</b></p> <p><b>C2-VVV</b> Refer to responses C2-H.</p>
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of Natural Heritage, Richmond, VA. Unpublished report submitted to the U.S. Army. October 1995. 65 pp.

**GSA Response**

No response necessary on this page.

**Wellman, Julia (DEQ)**

**From:** Ewing, Amy (DGIF)  
**Sent:** Friday, November 16, 2012 12:42 PM  
**To:** Wellman, Julia (DEQ)  
**Cc:** Cason, Gladys (DGIF); nhreview (DCR)  
**Subject:** ESSLog# 33324\_12-189F\_Foreign Affairs Training Center at Ft. Pickett

We have reviewed the subject project that proposes to construct a training center on approximately 1500 acres on Ft. Pickett in Nottoway County, VA.

According to our records, state Threatened barking treefrogs have been documented from the project area. However, we believe these specimens to have been moved to this site in agricultural supplies and not to be a native population of the species. Therefore, we have determined this project is not likely to result in adverse impacts upon this species.

C2-  
WWW

This project is located within 2 miles of a documented occurrence of a state or federal threatened or endangered plant or insect species and/or other Natural Heritage coordination species. Therefore, we recommend coordination with VDCR-DNH regarding the protection of these resources.

C2-  
XXX

To minimize overall impacts to wildlife and our natural resources, we offer the following comments about development activities: We recommend that the applicant avoid and minimize impacts to undisturbed forest, wetlands, and streams to the fullest extent practicable. Avoidance and minimization of impact may include relocating stream channels as opposed to filling or channelizing as well as using, and incorporating into the development plan, a natural stream channel design and wooded buffers. We recommend maintaining undisturbed naturally vegetated buffers of at least 100 feet in width around all on-site wetlands and on both sides of all perennial and intermittent streams. We recommend maintaining wooded lots to the fullest extent possible. We generally do not support proposals to mitigate wetland impacts through the construction of stormwater management ponds, nor do we support the creation of in-stream stormwater management ponds. We are willing to assist the applicant in developing a plan that includes open-space, wildlife habitat, and natural stream channels which retain their wooded buffers.

C2-  
YYY

We recommend that the stormwater controls for this project be designed to replicate and maintain the hydrographic condition of the site prior to the change in landscape. This should include, but not be limited to, utilizing bioretention areas, and minimizing the use of curb and gutter in favor of grassed swales. Bioretention areas (also called rain gardens) and grass swales are components of Low Impact Development (LID). They are designed to capture stormwater runoff as close to the source as possible and allow it to slowly infiltrate into the surrounding soil. They benefit natural resources by filtering pollutants and decreasing downstream runoff volumes.

We recommend that all tree removal and ground clearing adhere to a time of year restriction protective of resident and migratory songbird nesting from March 15 through August 15 of any year.

We recommend adherence to erosion and sediment controls during ground disturbance.

Thanks, Amy

**Amy Ewing | Environmental Services Biologist | VDGIF - Richmond HQ | 4010 West Broad St. Richmond, VA 23230 | 804-367-2211 | [www.dgif.virginia.gov](http://www.dgif.virginia.gov)**

**GSA Response**

**C2-WWW**

Comment noted.

**C2-XXX**

Refer to Response C2-T.

**C2-YYY**

Refer to response C2-Y.



COMMONWEALTH of VIRGINIA

Randall P. Burdette  
Director

Department of Aviation  
5702 Gulfstream Road  
Richmond, Virginia 23250-2422

V/TDD - (804) 236-3624  
FAX - (804) 236-3635

November 14, 2012

Ms. Julia Wellman  
Department of Environmental Quality  
Office of Environmental Impact Review  
629 East Main Street, Sixth Floor  
Richmond, Virginia 23219

RE: GSA Foreign Affairs Training Center, Nottoway County Virginia, DEQ Project # 12-189F

Dear Ms. Wellman:

The Virginia Department of Aviation has reviewed the information included in the link to the project provided in Ms. Fulcher's October 26, 2012 e-mail. Based on our review, staff has the following comments.

Comments

1. The Virginia Department of Aviation does not object to the project. However, due to the proximity of the proposed transmission lines that will be erected as part of this project to the Allen C. Perkinson /Blackstone Airfield, the project sponsor is required to submit a 7460 form to the Federal Aviation Administration (FAA) to determine if the proposed development would constitute a hazard to air navigation. If the FAA deems the proposed development to be hazardous to air navigation, the Department would not object to mitigation measures, such as obstruction lights, provided there are no negative impacts to the approach minimums to the airport and the measures will not result in the reduction of runway length.
2. All efforts should be taken by the project sponsor to limit the dust/glare generated from this project that could potentially negatively impact aircraft operations.

C2-ZZZ

C2-AAAA

If you have any questions regarding these comments please contact me at (804) 236-3632.

Sincerely,  
  
S. Scott Denny  
Senior Aviation Planner

100 DOAVAS 20121114 8KT DEQ Comments 12-189F



**GSA Response**

**C2-ZZZ**

Refer to Response C2-NN.

**C2-AAAA**

Refer to Response C2-OO.

**Wellman, Julia (DEQ)**

**From:** Kampinen, Andrea (DHR)  
**Sent:** Wednesday, November 14, 2012 3:15 PM  
**To:** Wellman, Julia (DEQ)  
**Cc:** Donna Andrews (3PCMC)  
**Subject:** Foreign Affairs Training Center, Nottoway County, DHR File No. 2012-1921

**DHR has been in consultation with the GSA regarding this project. We request that the GSA continue to consult directly with DHR pursuant to Section 106 of the National Historic Preservation Act (as amended) and its implementing regulations codified at 36 CFR Part 800 which require Federal agencies to consider the effects of their undertakings on historic properties.**

C2-  
BBBB

**Andrea Kampinen**  
Architectural Historian, Office of Review and Compliance  
Virginia Department of Historic Resources  
2801 Kensington Avenue  
Richmond, VA 23221  
(804) 482-6084  
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[andrea.kampinen@dhr.virginia.gov](mailto:andrea.kampinen@dhr.virginia.gov)

**GSA Response**

**C2-BBBB**  
Refer to Response C2-GG.

**Wellman, Julia (DEQ)**

**From:** Kampinen, Andrea (DHR)  
**Sent:** Wednesday, November 28, 2012 2:38 PM  
**To:** Donna Andrews (3PCMC)  
**Cc:** kkulis@achp.gov; Susan Smead (susan.e.smead@us.army.mil);  
Gallagher, Theresa@epamail.epa.gov; Wellman, Julia (DEQ)  
**Subject:** FASTC, Nottoway Co., VA - DHR File No. 2010-1921/DEQ#12-189F

Dear Ms. Andrews,

Please see the attached letter for the above referenced project. A hard copy will not follow so please print the attachment for your records. Should you have any additional information, I can be reached at the phone number or email address listed below.

Regards,

Andrea Kampinen



Letter Andrews -  
112812.pdf

**Andrea Kampinen**  
Architectural Historian, Office of Review and Compliance  
Virginia Department of Historic Resources  
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**GSA Response**

No response necessary on this page.



COMMONWEALTH of VIRGINIA

Douglas W. Domenech  
Secretary of Natural Resources

Department of Historic Resources  
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Kathleen S. Kilpatrick  
Director

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November 28, 2012

Donna Andrews  
U.S. General Services Administration, Mid-Atlantic Region  
The Strawbridge's Building  
20 North Eighth Street  
Philadelphia, PA 19107 - 3191

Re: Land Acquisition and Development at Fort Pickett by the Department of State Foreign Affairs Security Training Center – Phase I and II Cultural Resource Surveys, revisions and addendums Nottoway County, Virginia  
DHR File No. 2010-1921

Dear Ms. Andrews,

On October 2, 2012, the Virginia Department of Historic Resources (DHR) received additional information regarding the above-referenced project for our review and comment pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. DHR understands that the U.S. General Services Administration (GSA) and the Department of State (DOS) are proposing to acquire and develop several parcels of land for a Foreign Security Affairs Training Center (FASTC) at Fort Pickett, Nottoway County, Virginia. The FASTC will provide training for a variety of law enforcement and security disciplines managed by the DOS Bureau of Diplomatic Security. The project is partially funded through the American Recovery and Reinvestment Act (ARRA), but GSA will assume lead agency responsibilities under Section 106.

Following GSA's initiation of Section 106 consultation in October 2011, DHR understands that the property being sought for the facility has further changed in configuration. At this time, three parcels within Fort Pickett are under consideration: Local Reuse Authority (LRA) Parcel 9, 750 acres; LRA Parcel 10, 135 acres; and Parcel 21/20, 660 acres. Four additional parcels, 80 acres in total, are also being considered for additional space, if needed: Grid Parcel, 70 acres; range 8 Classroom R05, 5 acres; Parcel 10 Access Road; and Officer's Club Parking Lot. The most recent Cultural Resource Survey reports submitted to our office not only address DHR's comments from our July 2, 2012 letter, but also address comments from other consulting parties, and account for the additional four parcels under consideration. The two Build Alternatives being evaluated in the EIS incorporate these updated parcel configurations.

**Architectural Resources**

We have received for review the revised report, *Phase II Architectural Survey and Evaluation for the Proposed Foreign Affairs Security Training Center, Nottoway County, Virginia*, prepared by Cardno TEC in September 2012; and the new report, *Draft Addendum Phase II Architectural Survey for Additional*

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Northern Region Office  
5357 Main Street  
P.O. Box 519  
Stephens City, VA 22655  
Tel: (540) 868-7029  
Fax: (540) 868-7033

GSA Response

No response necessary on this page.

Page 2  
November 28, 2012  
DHR File No. 2010-1921

*Parcels at the Proposed Foreign Affairs Security Training Center, Nottoway County, Virginia*, prepared by Cardno TEC on September 24, 2012. We are pleased to report that the survey forms met our Data Sharing System (DSS) Quality Control Standards on November 14, 2012. C2-CCCC

As you know, the Fort Pickett Historic District (DHR ID#067-0110) was recommended as not eligible for listing in the Virginia Landmarks Register (VLR) or the National Register of Historic Places (NRHP) by our staff in October 2010. The *Phase II Architectural Survey* (also known as DHR's Reconnaissance Level Survey) identified five (5) resources within LRA Parcel's 9 and 10 (DHR ID#067-0110-0417, 0418, 0419, 0420, and 067-5034), and DHR still concurs with the consultant's recommendation that the resources are not recommended individually eligible for listing in the VLR/NRHP. There were no resources identified within Parcel 21/20. Furthermore, we feel the resources along Military Road and West Entrance Road have been adequately accounted for at this time. The one previously surveyed resource along West Entrance Road, Farley's (DHR ID#067-0183) should be considered potentially eligible for the purposes of this project. C2-DDDD

The *Draft Addendum Report* identified 44 previously surveyed architectural resources within/adjacent to the GRID Parcel; two (2) newly recorded resources within/adjacent the Range 8 Classroom R05 parcel; and no previously surveyed or newly identified resources within/adjacent the Parcel 10 Access Road or the Officer's Club Parking Lot. DHR concurs with the consultant that the two resources within the Range 8 Classroom R05 parcel (DHR ID#067-0110-0421 and 0422) are not eligible. No further survey work is recommended for these four additional parcels. C2-EEEE

**Archaeological Resources**  
We have received for review three archaeological reports, *Phase I Archaeological Survey and Phase II Evaluation for the Proposed Foreign Affairs Security Training Center, Nottoway County, Virginia*, revised, prepared by Kimberly M. Sebestyen, M.A., et al. of Cardno Tech in September 2012; *Draft Addendum Phase I Survey for Additional Parcels at the Proposed Foreign Affairs Security Training Center, Nottoway County, Virginia* prepared by Kimberly M. Sebestyen, M.A. of Cardno Tech in August 2012; *Draft Addendum Phase II Evaluation for the Proposed Foreign Affairs Security Training Center, Sites 44NT0207 and 44NT0218, Nottoway County, Virginia* prepared by Kimberly M. Sebestyen, M.A. and David Jenkins, M.A. of Cardno Tech in September 2012. We are pleased to inform you that the reports meet the federal *Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation* (48 FR 44716-44742, September 1983) and our state *Guidelines for Conducting Cultural Resource Survey in Virginia* (rev. 2011). Please see our comments for each of the reports below: C2-FFFF

*Phase I Archaeological Survey and Phase II Evaluation for the Proposed Foreign Affairs Security Training Center, Nottoway County, Virginia*  
It is our understanding that this report has been revised to address the comments made in our letter of July 2, 2012, as well as those of other consulting parties. We appreciate your willingness to conduct parallel investigations on Site 44NT0220 if additional investigation is warranted at Site 44NT0219. We understand, however, that no additional survey at these sites is planned at the present time as the tank trail route has been revised to avoid both sites. C2-GGGG

The report also includes the results of additional research conducted on Site 44NT0045. The revised historic context for this site now includes consideration of all four National Register criteria. Our Department's National Register Evaluation Committee met on October 25, 2012, to consider the eligibility of Site 44NT0045. Based upon the additional documentation provided, the committee finds C2-HHHH

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**GSA Response**

**C2-CCCC**  
Comment noted.

**C2-DDDD**  
Comment noted.

**C2-EEEE**  
Comment noted.

**C2-FFFF**  
Comment noted.

**C2-GGGG**  
Comment noted

**C2-HHH**  
Comment noted.

Page 3  
November 28, 2012  
DHR File No. 2010-1921

that Site 44NT0045 does not meet the National Register criteria. As such, we concur with the consultant's recommendation that no further archaeological investigations are warranted at this site.

C2-HHHH

I regret to inform you, however, that we do not agree that sufficient research has been conducted in connection with the isolated grave stone. While we can agree that the stone is not likely to be *in situ*, given the weight of the stones, they do not seem likely to have been deposited at any considerable distance from the, as yet, unidentified burial place. The issue is the stones suggest that the unmarked grave in the vicinity may be affected by future activities. We will reiterate that the grave stone does contain the name Smith. To avoid potential delays from post review discovery of the grave, we recommend conducting background research to identify the ownership of the Smith gravestone with adjacent property. As family cemeteries are common in Virginia, dependent on the results of the research, stripping of the area to locate grave shafts may be warranted.

C2-IIII

*Draft Addendum Phase I Survey for Additional Parcels at the Proposed Foreign Affairs Security Training Center, Nottoway County, Virginia*

No intact archaeological levels or features were identified during the survey. The level of effort documented in the report was sufficient to identify archaeological resources, if any were present. Based upon the results of the survey, we concur with the consultant's recommendation that no further archaeological investigations are warranted on the four additional parcels surveyed.

C2-JJJJ

*Draft Addendum Phase II Evaluation for the Proposed Foreign Affairs Security Training Center, Sites 44NT0207 and 44NT0218, Nottoway County, Virginia*

This report presents the results of the Phase II evaluation of two historic period sites identified during the Phase I survey for the FASTC project. The archaeological subcommittee of our Department's National Register Evaluation Committee met on October 25, 2012, to consider the eligibility of Sites 44NT0207 and 44NT0218. I regret to inform you that the committee finds that the report does not represent a level of effort sufficient to evaluate these sites. The scale of the map of Site 44NT0207 provided in Figure 6 (page 12) makes it difficult to distinguish positive from negative shovel tests. For this reason it is not clear how the site boundaries were determined. In some cases it appears that positive shovel tests, for example, M1+ 10S, were not bracketed with additional shovel tests.

C2-KKKK

Moreover, additional background research is needed to develop a more thorough historic context. Research on the ownership of the property appears to be limited to historic maps. We cannot agree that the number of properties incorporated into Fort Pickett preclude deed and tax record research that would assist in determining ownership and the social and economic status of the property's inhabitants. Apparently a 1944 map of the properties encompassed by Fort Pickett exists which shows the owner's name and size of the property; deed research could proceed back from that owner.

C2-LLLL

The Committee expressed similar concerns with respect to Site 44NT0218. Positive shovel tests appear to have been excavated outside of the site boundary as depicted on Figure 22 (page 47). In the conclusions section it is stated that "although portions of the southeastern area of the site have been disturbed due to structure demolition and/or military activities, the former structures associated with this site appear to be outside of the site boundary as well as the APE." It is not clear to us how the site is defined if structures associated with the site are not included within the site boundaries. Evaluation of a site requires that its nature and extent be determined.

C2-MMMM

We look forward to receiving more detailed information about Sites 44NT0207 and 44NT0218, including a more thorough historic context as well as defensible boundary definition. At this time, we are not

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**GSA Response**

**C2-HHHH**

(Response provided on previous page.)

**C2-IIII**

Refer to Response C2-FF

**C2-JJJJ**

Comment noted.

**C2-KKKK**

Refer to Response C2-FF

**C2-LLLL**

Refer to Response C2-FF

**C2-MMMM**

Refer to Response C2-FF

Page 4  
November 28, 2012  
DHR File No. 2010-1921

commenting on effects to historic properties until we receive your determination of effects as you state in your letter.

For questions regarding archaeology, please contact Ethel Eaton at (804) 482-6088 or [ethel.eaton@dhr.virginia.gov](mailto:ethel.eaton@dhr.virginia.gov). For architectural questions and any other questions, please contact me at (804) 482-6084, or via email at [andrea.kampinen@dhr.virginia.gov](mailto:andrea.kampinen@dhr.virginia.gov).

Sincerely,



Andrea Kampinen  
Architectural Historian, Office of Review and Compliance

Cc: Kirsten Brinker Kulis, ACHP  
Susan Smead, Virginia Army National Guard - Fort Pickett  
Theresa Gallagher, EPA  
Julia Wellman, VDEQ

**GSA Response**

No response necessary on this page.

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

Capital Region Office  
2801 Kensington Ave.  
Richmond, VA 23221  
Tel: (804) 367-2323  
Fax: (804) 367-2391

Tidewater Region Office  
14415 Old Courthouse Way  
2<sup>nd</sup> Floor  
Newport News, VA 23608  
Tel: (757) 886-2807  
Fax: (757) 886-2808

Western Region Office  
962 Kime Lane  
Salem, VA 24153  
Tel: (540) 387-5443  
Fax: (540) 387-5446

Northern Region Office  
5357 Main Street  
P.O. Box 519  
Stephens City, VA 22655  
Tel: (540) 868-7029  
Fax: (540) 868-7033

Carl E. Garrison III  
State Forester



**COMMONWEALTH of VIRGINIA**

**DEPARTMENT OF FORESTRY**  
900 Natural Resources Drive, Suite 800  
Charlottesville VA 22903  
434.977.6555 ~ Fax: 434.296.2369  
www.dof.virginia.gov

November 29, 2012

Ms. Julia H. Wellman  
Department of Environmental Quality  
Office of Environmental Impact Review  
629 East Main Street, Sixth Floor  
Richmond, VA 23219

Dear Ms. Wellman:

Per your request to the Virginia Department of Forestry (DOF) for input on the proposed construction of the Foreign Affairs Training Facility (FATC) at Fort Pickett, DEQ project Number 12-189F, by the General Services Administration, below is our response.

The DOF finds that this project will have a significant impact on the forest resources of the Commonwealth from the removal of 525 acres of heavily forested land. This includes areas within identified project parcels LRA 10 and 21/20 that have been determined to have a high forest conservation value [FCV] (4 out of possible 5 ranking). This determination was made using the web-based application InFOREST (<http://inforest.frec.vt.edu/>). Therefore, the DOF recommends that a forest mitigation plan be put in place to both support the Governor's goal to conserve 400,000 acres of land by the end of his administration and DOF policy objectives for limiting the rate and degree of forestland loss in the Commonwealth as the project moves forward. This plan would be developed in a way that identifies opportunities for Department of Defense (DoD) to address their environmental concerns also. The DOF would welcome discussions with the FATC sponsors concerning potential mitigation plan options for this project.

These options could be structured to help meet DOF forest conservation objectives and complement DoD and DGIF species habitat considerations, while simultaneously further enhancing forested national security buffers around sensitive areas within the FATC's development footprint. Given these objectives, potential opportunities for mitigation include but are not limited to the following:

1. LRA parcel 9, the Grid and 21/20: DOF recommends that the development of the footprints for each parcel be designed to maximize the amount of forested area between the sections to be developed and the surrounding undeveloped forest. This suggestion is made to keep forest fragmentation to a minimum and to support DoD and DGIF objectives that the value of the retained forest to interior species is optimized. Of particular interest to DOF is the forest block located on the westernmost portion of LRA Parcel 9 that is considered in the DEIS to be large enough to have moderate value to forest interior species and areas within 21/20 that have been determined to have high forest conservation value[FCV] as determined by the InFOREST application.

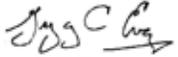
Mission: We Protect and Develop Healthy, Sustainable Forest Resources for Virginians.

**GSA Response**

**C2-NNNN**

Refer to response C2-AA.

C2-NNNN

<p>2. <u>LRA parcel 10</u>: The Department of Forestry would like to better understand what the proposed development footprint will be before it can offer specific comments. The DEIS offers only very general guidance on development plans and LRA parcel 10 contains high FCV areas. The forest conservation value of LRA parcel 10 is considered high because it is a second growth mixed forest that has been subject to very little previous development, it is part of a larger contiguous forest, and its western edge abuts a wetland area that may have water quality value for the adjacent residential areas.</p> <p>3. <u>State to federal land conversion</u>: Since LRA parcel 9 and LRA parcel 10 will convert to federal land under the FATC's proposed preferred build option, The Department would welcome the opportunity to consult with federal representatives on the outline of the parcel footprints as the project proceeds through its various phases so forest mitigation efforts can be optimized.</p> <p>4. <u>Buffer extension</u>: The Department of Forestry would also like to discuss with Ft. Pickett representatives the possibility of extending the current ACUB buffer north of Lunenburg County to provide additional protection for existing forest as well as providing additional security for the FATC.</p> <p>5. <u>Forest replacement</u>: Virginia has been losing approximately 16,000 acres of forestland annually based on a 10 year average ending in 2010. Urbanization and development represent the single biggest factor in the loss of this forestland acreage. Under the FATC preferred build option, 525 acres of heavily forested land will be lost and the DOF would like to see that loss mitigated. Potential opportunities for mitigation include but are not limited to the following recommendations:</p> <p>a) Project sponsors could reforest and protect open federal lands within the Commonwealth of Virginia to create forestlands.</p> <p>b) US Army Fort Pickett as the landlord installation for the proposed FATC, could work with the DOF or another Virginia conservation agency or group to create a forest land conservation fund that would be used for the purchase or donation of conservation easements, reforestation, or property acquisition of forestlands. These activities could be within the impacted area or statewide and would ensure that the forested lands are managed and retained as forest lands in perpetuity.</p> <p>Thank you for the opportunity to comment.</p> <p>Sincerely,</p>  <p>Gregory C. Evans          Voluntary Mitigation Program Manager          VA Department of Forestry          900 Natural Resources Drive, Suite 800          Charlottesville, VA 22903          434-220-9020</p> <p>cc: B. Kline</p>	<p><b>GSA Response</b></p> <p><b>C2-NNNN</b>          (Response provided on previous page.)</p> <p><b>C2-0000</b>          Refer to Response C2-BB.</p> <p><b>C2-PPP</b>          Refer to Response C2-CC.</p> <p><b>C2-QQQQ</b>          Refer to Response C2-DD.</p>
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**Wellman, Julia (DEQ)**

**From:** Forsgren, Diedre (VDH)  
**Sent:** Tuesday, November 13, 2012 2:41 PM  
**To:** Wellman, Julia (DEQ)  
**Subject:** (12-189F) EIS: Foreign Affairs Training Center

DEQ Project #: 12-189F  
 Name: Foreign Affairs Training Center  
 Sponsor: U. S. General Services Training Center  
 Location: Nottoway County

**Please note an error in Chapter 3.2.8.1 of this Draft EIS, under "Utilities and Infrastructure/Potable Water".** The report says that the Town of Blackstone's Water Treatment Plant is permitted by DEQ. This is in error. The withdrawal from the river is permitted by DEQ; however, the public water treatment plant (Blackstone, Town of; Waterworks ID #VA5135100) is permitted through the primacy agency, the Virginia Department of Health - Office of Drinking Water, under the requirements of the Safe Drinking Water Act and the provisions of the *Virginia Waterworks Regulations*.

C2-RRRR

VDH – Office of Drinking Water has reviewed DEQ Project Number 12-189F. Below are our comments as they relate to proximity to public drinking water sources (groundwater wells, springs and surface water intakes). Potential impacts to public water distribution systems or sanitary sewage collection systems must be verified by the local utility.

C2-SSSS

No groundwater wells are within a 1 mile radius of the project site.

No surface water intakes are located within a 5 mile radius of the project site.

Project does not fall within Zone 1 (up to 5 miles into the watershed). Project falls within Zone 2 (greater than 5 miles into the watershed) of one public surface water source, but is outside of our review area.

There are no apparent impacts to public drinking water sources due to this project.

Please don't hesitate to contact Barry E. Matthews (804.864.7515; [Barry.Matthews@vdh.virginia.gov](mailto:Barry.Matthews@vdh.virginia.gov)) or myself should you have any questions.

**Diedre Forsgren**

Office Services Specialist  
 VIRGINIA DEPARTMENT OF HEALTH  
 Office of Drinking Water, Room 622-A  
 109 Governor Street  
 Richmond, VA 23219  
 Phone: (804) 864-7241  
 email: [diedre.forsgren@vdh.virginia.gov](mailto:diedre.forsgren@vdh.virginia.gov)

**GSA Response**

**C2-RRRR**

Refer to comment C2-KK.

**C2-SSSS**

Comment noted.

**SUPERVISORS**

JACK J. GREEN, CHAIRMAN  
DISTRICT 3  
SHERMAN C. VAUGHN, VICE CHAIRMAN  
DISTRICT 4  
CLARENCE A. SIMPSON  
DISTRICT 5  
STEVE W. BOWEN  
DISTRICT 1  
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DISTRICT 2

OFFICE OF  
**THE BOARD OF SUPERVISORS**  
NOTTOWAY COUNTY



P. O. BOX 92  
344 W. COURTHOUSE RD.  
NOTTOWAY, VIRGINIA 23855  
TELEPHONE: (434) 645-8696  
FAX NO. (434) 645-8667  
E-MAIL: nottoway@nottoway.org

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**ASSISTANT ADMINISTRATOR**  
JOHN N. PROSSE

**BUILDING INSPECTOR**  
A. Q. ELLINGTON, III

**COUNTY PLANNER**  
BRANDI R. NEWCOMB

RECEIVED

NOV 01 2012

DEQ-Office of Environmental  
Impact Review

October 30, 2012

Virginia Department of Environmental Quality  
Office of Environmental Impact Review  
629 E. Main Street 6<sup>th</sup> Floor  
Richmond, Virginia 23219

Attention: Julia Wellman

Dear Ms. Wellman,

All members of the Nottoway County Board of Supervisors have received and reviewed the draft Environmental Impact Statement for the proposed United States Department of State's Foreign Affairs Security Training Center.

As this facility will be entirely contained within our county, its impacts are of special interest to its citizens and their elected leaders. Despite the size and complexity of the project, our review of the document has not shown any potential impacts to be problematic for Nottoway County. It also appears neither to hold any negative impacts to the surrounding area.

The Board of Supervisors is unanimous in its support of the draft EIS document and the described project as presented in it.

Respectfully,

Jack J. Green  
Chairman, Nottoway County Board of Supervisors

C2-TTTT

**GSA Response**

**C2-TTTT**

Comment noted.



Planning District Commission



Metropolitan Planning Organization

Town of  
Ashland  
Counties of  
Charles City  
Chesterfield  
Goochland  
Hanover  
Henrico  
New Kent  
Powhatan  
City of  
Richmond

Executive Director  
Robert A. Crum, Jr.

**MEMORANDUM**

**TO:** Julia H. Wellman  
Department of Environmental Quality

**FROM:** Barbara V. Jacocks, AICP  
Principal Planner

**DATE:** November 14, 2012

**SUBJECT:** ENVIRONMENTAL REVIEW AND COMMENT

**Project Title:** Foreign Affairs Training Center

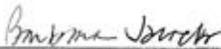
**CCN:** VA13-1114-3172-015-00135

The RRPDC received a request for comment concerning this proposal on October 26, 2012. RRPDC staff sent the request to staff of planning district member localities on October 30, 2012 in order to solicit comments to include in a comment letter. Any documents associated with the request were made available to locality staff. Response comments from locality staff were requested on or before close of business November 12, 2012.

RRPDC did not receive comments from locality staff.

RRPDC staff has reviewed the Draft Environmental Impact Statement. Since construction of the proposed project will occur outside of the RRPDC boundary and no RRPDC localities have expressed concerns, RRPDC staff defer to comments submitted by Planning District Commissions and other jurisdictions closer to the project site.

C2-UUUU

Signature   
Barbara V. Jacocks, AICP  
Principal Planner

BVJ/sgs

**GSA Response**

**C2-UUUU**  
Comment Noted.

**Wellman, Julia (DEQ)**

**From:** Mark Bittner [mbittner@craterpdc.org]  
**Sent:** Tuesday, October 30, 2012 10:00 AM  
**To:** Wellman, Julia (DEQ)  
**Cc:** 'Dennis Morris'  
**Subject:** GSA: Foreign Affairs Training Center, Nottoway County, VA, DEQ #12-189F

Dear Ms. Wellman:

Thank you for submitting the GSA: Foreign Affairs Training Center, Nottoway County, VA for review (DEQ # 12-189F).

Based upon the Crater Commission's staff review, we find the proposal to be in full accord with the Crater Planning District Commission's environmental policy directives. ] C2-VVVV

We look forward to implementation of the proposal.

Sincerely,

Mark Bittner



**GSA Response**

C2-VVVV  
Comment Noted.

**Wellman, Julia (DEQ)**

**From:** Wade Bartlett [wbartlett@co.prince-edward.va.us]  
**Sent:** Wednesday, December 05, 2012 5:25 PM  
**To:** Wellman, Julia (DEQ)  
**Subject:** RE: ENVIRONMENTAL IMPACT REVIEW REQUEST

Prince Edward County has no comments. Thanks for asking  C2-WWWW

**From:** Wellman, Julia (DEQ) [mailto:Julia.Wellman@deq.virginia.gov]  
**Sent:** Wednesday, December 05, 2012 11:53 AM  
**To:** Wade Bartlett  
**Subject:** RE: ENVIRONMENTAL IMPACT REVIEW REQUEST

I did not receive comments from Prince Edward, so I am just double checking that you all did not submit comments.

Julia Wellman  
Environmental Impact Review Coordinator  
Virginia Department of Environmental Quality  
Office of Environmental Impact Review  
PO Box 1105  
Richmond, VA 23218  
Phone: (804) 698-4326  
Fax: (804) 698-4319  
E-mail: [Julia.Wellman@deq.virginia.gov](mailto:Julia.Wellman@deq.virginia.gov)

**From:** Wade Bartlett [mailto:wbartlett@co.prince-edward.va.us]  
**Sent:** Wednesday, October 31, 2012 12:33 PM  
**To:** Wellman, Julia (DEQ)  
**Subject:** RE: ENVIRONMENTAL IMPACT REVIEW REQUEST

Thank you

**From:** Wellman, Julia (DEQ) [mailto:Julia.Wellman@deq.virginia.gov]  
**Sent:** Wednesday, October 31, 2012 9:22 AM  
**To:** Wade Bartlett  
**Subject:** RE: ENVIRONMENTAL IMPACT REVIEW REQUEST

Hi Mr. Bartlett,

It is up to the discretion of the county and board as to what is reviewed. The draft EIS discusses regional impacts that I thought may be of interest to nearby counties.

If you can get back to me with comments by November 20, I would appreciate it.

Thank you.

Regards, Julia

Julia Wellman  
Environmental Impact Review Coordinator  
Virginia Department of Environmental Quality  
Office of Environmental Impact Review  
PO Box 1105

**GSA Response**

**C2-WWWW**

Comment Noted.

**Wellman, Julia (DEQ)**

**From:** Tracy Gee [tgee@lunenburgva.net]  
**Sent:** Thursday, December 06, 2012 1:18 PM  
**To:** Wellman, Julia (DEQ)  
**Subject:** RE: NEW PROJECT GSA 12-189F

Lunenburg County is in favor of the project and mailed a Letter of Support. I hope that it has been filed with your ] C2-XXXX comments.



Tracy M. Gee  
 County Administrator  
 Lunenburg County Administration  
 11413 Courthouse Road  
 Lunenburg, VA 23952

Voice: 434-696-2142  
 Fax: 434-696-1798  
 tgee@lunenburgva.net

**From:** Wellman, Julia (DEQ) [mailto:Julia.Wellman@deq.virginia.gov]  
**Sent:** Wednesday, December 05, 2012 12:04 PM  
**To:** Tignor, Keith (VDACS); Ray, Alfred C. (VDOT); Cromwell, James R. (VDOT); Spears, David (DMME); mhickman@virginiashheartland.org; gmoodys@southsidepic.org; planning@chesterfield.gov; John.Cavan@southside.edu; cwoolridge@brunswickco.com; phillip@townofblackstoneva.com; taylor.harvie@ameliacova.com; wbartlett@co.prince-edward.va.us; Massengill, Kevin K W; tgee@lunenburgva.net; wilki@vt.edu; murphybr@vt.edu; Rice, Ronald (VSP); cotton.purvey@us.army.mil  
**Subject:** RE: NEW PROJECT GSA 12-189F

Regarding the project referenced below, if you plan to comment, please email me your comments ASAP today. Thank you.

Julia Wellman  
 Environmental Impact Review Coordinator  
 Virginia Department of Environmental Quality  
 Office of Environmental Impact Review  
 PO Box 1105  
 Richmond, VA 23218  
 Phone: (804) 698-4326  
 Fax: (804) 698-4319  
 E-mail: [Julia.Wellman@deq.virginia.gov](mailto:Julia.Wellman@deq.virginia.gov)

**From:** Fulcher, Valerie (DEQ)  
**Sent:** Friday, October 26, 2012 2:10 PM  
**To:** Cason, Gladys (DGIF); Tignor, Keith (VDACS); Rhur, Robbie (DCR); odwreview (VDH); Coe, Stephen (DEQ); Narasimhan, Kotur (DEQ); Cholko, Michael (DEQ); Ray, Alfred C. (VDOT); Cromwell, James R. (VDOT); Watkinson, Tony (MRC); Kirchen, Roger (DHR); Spears, David (DMME); Kline, Everette (DOF); mhickman@virginiashheartland.org;

**GSA Response**

C2-XXXX  
 Comment Noted.

# TRIBES

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**EBCI THPO comments regarding the Department of State FASTC - Draft EIS Notification and Public Meeting**

Tyler B. Howe <tylehowe@nc-chokeee.com>  
To: "fastc.info@gsa.gov" <fastc.info@gsa.gov>  
Cc: Russell Townsend <RussellT@nc-chokeee.com>

Mon, Oct 29, 2012 at 2:05 PM

To whom it may concern:

The Eastern Band of Cherokee Indians Tribal Historic Preservation Office (EBCI THPO) has reviewed the materials provided for the proposed Draft Environmental Impact Statement for Planning Activities at Fort Pickett, Blackstone, Nottoway County, Virginia. Nottoway County, Virginia, is outside the traditional aboriginal territory of the Cherokee people. As such, the EBCI THPO wishes to defer this federal undertaking to those federally recognized Indian Nations whose traditional aboriginal territory falls within the expected Area for Potential Effect.

T1-A

Please do not hesitate to contact me should you have additional questions.

Sincerely,

Tyler B. Howe  
Tribal Historic Preservation Specialist  
Eastern Band of Cherokee Indians

From: Russell Townsend  
Sent: Friday, October 26, 2012 11:56 AM  
To: Tyler B. Howe  
Subject: FW: Department of State FASTC - Draft EIS Notification and Public Meeting

**GSA Response**

**T1-A**  
Comment noted.



**HAUDENOSAUNEE**  
TUSCARORA NATION  
2006 MT. HOPE ROAD — VIA: LEWISTON, NEW YORK 14092

October 31, 2012

Abkgail Low  
Project Executive  
U.S. General Service Administration  
Correspondence Symbol 3PAC  
The Strawbridge Building  
20 North Eighth Street  
Philadelphia, PA 19107-3191

Dear Ms. Low:

The Tuscarora Nation wish to inform you that they are unable to attend the meeting to be held November 7, 2012 at the Blackstone Conference & Retreat Center in Blackstone, Virginia on the EIS. The Nation request at written copy be sent to the Nation for review and thus we can send a written comment.

T2-A

Your cooperation in regards to this request will be greatly appreciated.

ONEH  
*Chief Leo R. Henry*  
Chief Leo R. Henry, Clerk  
Tuscarora Nation

**GSA Response**

**T2-A**

A paper copy of the Draft EIS was delivered to the Tuscarora Nation on November 21, 2012. A paper copy of the Supplemental Draft EIS was sent on January 9, 2014.

## **LOCAL OFFICIALS AND AGENCIES**

---

**BOARD OF SUPERVISORS**

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Election District 6
- Robert G. Zava  
Election District 7



Lunenburg County Administration  
11413 Courthouse Road  
Lunenburg, VA 23052

Tracy M. Gae  
County Administrator

Telephone: (434) 696-2142  
Facsimile: (434) 696-1703

November 8, 2012

Ms. Abigail Low  
Project Manager  
U. S. General Services Administration  
20 N 8<sup>th</sup> Street  
Philadelphia, PA 19107

RE: Letter of Support

Dear Ms. Low,

The Lunenburg County Board of Supervisors is glad to submit this letter of support for the possible location of the United States, Department of State, Foreign Affairs Security Training Center in Nottoway County, Virginia. As a neighboring county to the location being considered, we hope to enjoy some of the positive economic impact such a facility will provide; a variety of jobs for our citizens and newcomers alike, increased need of services, increased retail business, and the possibility of new businesses developing. We foresee that the development of this facility will reach far beyond its footprint in many ways; the economic impact, increased knowledge of our communities, trainees that may return as tourists, and increased educational benefits that may be offered locally.

L1-A

We understand that this has been a long and involved process and that thus far your findings have been very positive. We look forward to an approval of the Nottoway County location sometime in Spring 2013.

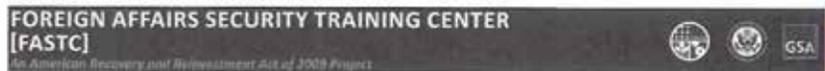
Again, Lunenburg County is in full support of the location of FASTC on the Fort Pickett and adjoining properties. If we can be of any help, or provide information, please do not hesitate to call on us. Thank you for all of your efforts in this project.

Sincerely,

T. Wayne Hoover  
Chairman

**GSA Response**

**L2-A**  
Comment noted.



## Comment Form FASTC Draft Environmental Impact Statement

The U.S. General Services Administration (GSA) has prepared a Draft Environmental Impact Statement (EIS) for the proposed U.S. Department of State FASTC in Nottoway County. The Draft EIS is available at local libraries and on the project website: [www.state.gov/recovery/fastc](http://www.state.gov/recovery/fastc). Please submit your comments on the Draft EIS no later than December 10, 2012 by:

- 1 Filling out this form and dropping it in the comment box at the public meeting
- 2 Talking to our stenographer who can record your comments at the public meeting
- 3 Submitting comments electronically via email to: [FASTC.info@gsa.gov](mailto:FASTC.info@gsa.gov)
- 4 Mailing your comment form to: Ms. Abigail Low, GSA Project Manager, 20 N 8th Street, Philadelphia, PA 19107

Please provide comments no later than December 10, 2012 to ensure they are considered during preparation of the Final EIS.

**Please Note:** The information and comments provided are published in the Final EIS and become part of the administrative record associated with this proposed action.

Please check here if you would **NOT** like to be on the Email/ mailing list

Please check here if you would like your name and Email/ mailing address kept private (i.e., not published in the Final EIS documents)

PLEASE PRINT CLEARLY AND LEGIBLY

Name: H. Wayne Carter Date: November 14, 2012  
 Organization/Affiliation: Mecklenburg County / County Administrator  
 Email/Mailing Address: wayne.carter@mecklenburgva.com / P.O. Box 307  
 City, State, Zip Code: Boydton, Va. 23917

Comments: On behalf of the Mecklenburg County Board of Supervisors, I want to fully support the FASTC project being studied for Nottoway County. This project would be a tremendous boost to the economy of all of the mentioned localities in the region. Mecklenburg County is relatively close to Fort Pickett & will benefit from the construction jobs as well as the long term employment opportunities.

L2-A

### GSA Response

L2-A  
Comment noted.

**FOREIGN AFFAIRS SECURITY TRAINING CENTER  
[FASTC]**

An American Recovery and Reinvestment Act of 2009 Project



**Comment Form  
FASTC Draft Environmental Impact Statement**

The U.S. General Services Administration (GSA) has prepared a Draft Environmental Impact Statement (EIS) for the proposed U.S. Department of State FASTC in Nottoway County. The Draft EIS is available at local libraries and on the project website: [www.state.gov/recovery/fastc](http://www.state.gov/recovery/fastc). Please submit your comments on the Draft EIS no later than December 10, 2012 by:

- 1 Filling out this form and dropping it in the comment box at the public meeting
- 2 Talking to our stenographer who can record your comments at the public meeting
- 3 Submitting comments electronically via email to: [FASTC.info@gsa.gov](mailto:FASTC.info@gsa.gov)
- 4 Mailing your comment form to: Ms. Abigail Low, GSA Project Manager, 20 N 8th Street, Philadelphia, PA 19107

Please provide comments no later than December 10, 2012 to ensure they are considered during preparation of the Final EIS.

**Please Note:** The information and comments provided are published in the Final EIS and become part of the administrative record associated with this proposed action.

Please check here if you would **NOT** like to be on the Email/mailling list

Please check here if you would like your name and Email/mailling address kept private (i.e., not published in the Final EIS documents)

PLEASE PRINT CLEARLY AND LEGIBLY

Name: Stephen Power Date: 11-7-12  
 Organization/Affiliation: Nottoway County Board of Supervisors  
 Email/Mailing Address: 1605 Orchard Rd  
 City, State, Zip Code: Burkeville, Va. 23922

Comments: I support this project whole heartily & am very thankful it will be located in Nottoway County.

Respectfully,

Stephen Power

L3-A

**GSA Response**

**L3-A**

Comment noted.

**FOREIGN AFFAIRS SECURITY TRAINING CENTER  
[FASTC]**

An American Recovery and Reinvestment Act of 2009 Project



**Comment Form  
FASTC Draft Environmental Impact Statement**

The U.S. General Services Administration (GSA) has prepared a Draft Environmental Impact Statement (EIS) for the proposed U.S. Department of State FASTC in Nottoway County. The Draft EIS is available at local libraries and on the project website: [www.state.gov/recovery/fastc](http://www.state.gov/recovery/fastc). Please submit your comments on the Draft EIS no later than December 10, 2012 by:

- 1 Filling out this form and dropping it in the comment box at the public meeting
- 2 Talking to our stenographer who can record your comments at the public meeting
- 3 Submitting comments electronically via email to: [FASTC.info@gsa.gov](mailto:FASTC.info@gsa.gov)
- 4 Mailing your comment form to: Ms. Abigail Low, GSA Project Manager, 20 N 8th Street, Philadelphia, PA 19107

Please provide comments no later than December 10, 2012 to ensure they are considered during preparation of the Final EIS.

**Please Note:** The information and comments provided are published in the Final EIS and become part of the administrative record associated with this proposed action.

Please check here if you would **NOT** like to be on the Email/ mailing list \_\_\_\_\_

Please check here if you would like your name and Email/ mailing address kept private (i.e., not published in the Final EIS documents) \_\_\_\_\_

PLEASE PRINT CLEARLY AND LEGIBLY

Name: Phil Miskovic Date: 11-7-12

Organization/Affiliation: Councilman, Town of Crewe

Email/Mailing Address: phil.miskovic@gmail.com 100 Olive Ave

City, State, Zip Code: Crewe VA 23930

Comments: The Town of Crewe and its citizens are very excited about this proposed plan. We look forward to a long, healthy regional partnership with all parties involved, and to welcoming DoS personnel with open arms.

L4-A

**GSA Response**

**L4-A**

Comment noted.



**Comment Form**  
**FASTC Draft Environmental Impact Statement**

The U.S. General Services Administration (GSA) has prepared a Draft Environmental Impact Statement (EIS) for the proposed U.S. Department of State FASTC in Nottoway County. The Draft EIS is available at local libraries and on the project website: [www.state.gov/recovery/fastc](http://www.state.gov/recovery/fastc). Please submit your comments on the Draft EIS no later than December 10, 2012 by:

- 1 Filling out this form and dropping it in the comment box at the public meeting
- 2 Talking to our stenographer who can record your comments at the public meeting
- 3 Submitting comments electronically via email to: [FASTC.info@gsa.gov](mailto:FASTC.info@gsa.gov)
- 4 Mailing your comment form to: Ms. Abigail Low, GSA Project Manager, 20 N 8th Street, Philadelphia, PA 19107

Please provide comments no later than December 10, 2012 to ensure they are considered during preparation of the Final EIS.

Please Note: The information and comments provided are published in the Final EIS and become part of the administrative record associated with this proposed action.

Please check here if you would NOT like to be on the Email/ mailing list

Please check here if you would like your name and Email/ mailing address kept private (i.e., not published in the Final EIS documents)

PLEASE PRINT CLEARLY AND LEGIBLY

Name: LAFAYETTE DICKENS Date: 11-7-12

Organization/Affiliation: DOWNTOWN BLACKSTONE INC.

Email/Mailing Address: manager@downtownblackstone.org 107 W. Broad St

City, State, Zip Code: Blackstone, VA 23824

Comments: My main emphasis is in the area of economic development. As such I am curious to know how Blackstone can position itself to be more competitive or attractive to those who will be working at the facility. It seems like the EIS indicates that Chesterfield County is positioned to benefit more than Nottoway with almost no stake in the facility and absolutely no investment or negative impacts. What can we best offer those who train at the facility versus those who will work there. Which will we need most to prepare for?

L5-A

**GSA Response**

**L5-A**

Through GSA's Urban Development/Good Neighbor program and USEPA's Community Assistance and Research expertise, GSA and USEPA, in a joint effort with the town, county, Fort Pickett, and the Virginia Economic Development Partnership, will assist Blackstone and Nottoway County in preparing for FASTC-related economic effects.



## CITY OF EMPORIA

December 10, 2012

Ms. Abigail Low  
Project Manager  
U. S. General Services Administration  
20 N 8<sup>th</sup> Street  
Philadelphia, PA 19107

RE: Letter of Support

Dear Ms. Low:

The City of Emporia is glad to submit this letter of support for the possible location of the United States, Department of State, Foreign Affairs Security Training Center in Nottoway County, Virginia. As a participating locality within the Virginia Growth Alliance regional economic development organization along with Nottoway County and other neighboring jurisdictions, we hope to enjoy some of the positive economic impact such a facility will provide; a variety of jobs for our citizens and newcomers alike, increased need of services, increased retail business, and the possibility of new businesses developing. We foresee that the development of this facility will reach far beyond its footprint in many ways; the economic impact, increased knowledge of our communities, trainees that may return as tourists, and increased educational benefits that may be offered locally.

L6-A

We understand that this has been a long and involved process and that thus far your findings have been very positive. We look forward to an approval of the Nottoway County location sometime in Spring 2013.

Again, the City of Emporia is in full support of the location of FASTC on the Fort Pickett and adjoining properties. If we can be of any help, or provide information, please do not hesitate to call on us. Thank you for all of your efforts in this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian S. Throver".

Brian S. Throver  
City Manager

PO BOX 511, 201 SOUTH MAIN ST., EMPORIA, VA 23847 TELEPHONE: (434) 634 3332 FAX: (434) 634 0003  
Visit Our Website at: [www.ci.emporia.va.us](http://www.ci.emporia.va.us)

L6-A

Comment noted.

## **INDIVIDUALS**

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<p>*From:* <a href="mailto:sonnyabbott@sol.com">sonnyabbott@sol.com</a>                  *Date:* October 29, 2012, 11:35:05 AM EDT                  *To:* <a href="mailto:abby.low@gsa.gov">abby.low@gsa.gov</a>                  *Subject:* *FastC EIS Proposal*</p> <p>Ms. Low,</p> <p>A quick review of the EIS suggests that the program is under utilizing the area to house prospective training candidates. At full operation, estimated to be the year 2020, there would be 450 students residing on-site while attending the program with 250 students residing in hotels, off-site, while attending the program. Using \$25.00 per night, per person, yields a cost of \$6,250 per night or \$31,250 per week for those residing off-site. The \$25 per night, per person, is an extremely low estimate for any hotel in the greater Fort Picket area so the potential savings is substantial despite the initial cost of constructing three additional 90-person units on-site. Housing all trainees on-site eliminates the needs for supplemental transportation and other associated per-diem costs.</p> <p>The EIS suggests an estimated employment level of 1070 when in full operation. Phase one was broken down to 248 already filled and 285 filled locally. Phase 2 is to add 229 employees and Phase 3 is to add 308 employees. Is there a breakdown of Phase 2 and Phase 3 as to the number that would be hired "locally" and those hired outside the local area?</p> <p>Thank you, in advance, for your time. I trust you and the team are safe from the current weather pattern headed in your direction.</p> <p>Respectfully,                  Sonny Abbott</p>	<p><b>GSA Response</b></p> <p><b>I1-A</b>                  Dormitories are no longer included in the Proposed Action and all overnight accommodations would be in local/regional motels/hotels. Refer to Supplemental Draft EIS Section 4.2.5.1 and Appendix J for the updated analysis.</p> <p><b>I1-B</b>                  Potential local hires by phase may be determined by subtracting the number of transfer employees (refer to Table 4.2-10) from the total full time equivalent employment, including direct jobs generated by spending = 783 total (Table 4.2-9). Refer to Supplemental Draft EIS Section 4.2.5.1 and Appendix J for the updated analysis.</p>
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Ms. Abigail Low  
 GSA Project Manager  
 20 N 8<sup>th</sup> Street  
 Philadelphia, PA 10107

November 12, 2012

Re: FASTC Draft Environmental Impact Statement  
 Proposed U.S. Department of State PSTC in Nottoway County

Dear Ms. Low:

I support FASTC! I believe the facilities should be totally contained within the geographic boundaries outlined in the Environmental Impact Study or what is commonly known as Picket Park and Fort Picket Military Base. The current and future Department of State employees, those highly skilled (former military) and others selected to serve in the employ of the Government need the privacy, seclusion, and limited public access the Military Base offers. These personnel are the face of the United States of America in foreign lands, all around the world, and the Base offers an additional modicum of security during their stay.

I1-C

My concerns revolve around the most effective or productive use of Tax Dollars in delivering an outcome that will meet the needs of the Department of State and provide an ongoing positive impact on local economies.

My questions and concerns are:

1. *What is the estimate number of TRAINING DAYS required for instruction of the professionals attending the facility?*
  - Training of 8,000 to 10,000 persons per year.
  - Training ranging from 5 days to 112 days. Without a breakdown it is impossible to understand why the use of local Hotel-Motels are required. The simplistic use of math cannot be an effective tool in determining this answer. Ten thousand professionals trained over 50 weeks equates to 200 per week to achieve the end result (10,000/50=200).
2. *Is 112,500 room nights adequate to house those professionals attending the training programs?*
  - Calculations of available on-site room nights is 112,500, (50 weeks x 5 days per week x 450 rooms = 112,500 room nights).
  - Documents outline purchase of 200+ hotel room nights per night for each year from 2020 and beyond.
3. *Is 112,500 room nights are inadequate is it more cost effective to build additional on-site dormitories or contract off-site hotel rooms?*
  - The cost of an off-site hotel, estimate \$50 per night, is \$5000 per night (50 x 100 rooms = \$5000), or \$25,000 per week or \$1,250,000 per 50 week year. At completion, in 2020, that figure is in excess of \$2,500,000. Estimate: 38,700 sq. ft. 90-room dormitory at \$125 per sq. ft. = \$4,837,500. A relative quick return of initial investment.
4. *Is it possible to achieve a \$1.2 million economic impact each and every year at completion in 2020?*
  - A disproportionate number of projected employees (professionals currently within the employ of the Government) will reside outside Nottoway County. Unknown are those military or government employees currently assigned to Fort Picket, if any.
  - Those hired locally may come from outside Nottoway County and therefore reside outside Nottoway County.
  - The facility will have an on-site cafeteria. Local eateries will not see significant foot traffic, morning, noon or night.
  - Students will be bused to the facility limiting travel off-site.
  - The facility will have an on-site medical activity.

I1-D

I1-E

I1-F

I1-G

**GSA Response**

**I1-C**

Comment noted

**I1-D**

An average of 600 students would be on-site on an average training day. Training schedules and the number of trainees on-site in a given week would vary, as would the number of hotel-motel nights required. Refer to Supplemental Draft EIS Section 4.2.5.1 *Economic Impacts* and Appendix J *Economic and Fiscal Impacts Technical Studies* for updates to the economic impact analysis for Build Alternative 3. The estimate of hotel room nights is a best estimate used for planning purposes; the actual number may vary.

**I1-E**

Please refer to Response I1-A

**I1-F**

Dormitories are no longer included in the Proposed Action. Refer to Supplemental Draft EIS Section 4.2.5.1 and Appendix J for the updated analysis. Please also refer to Response I1-A.

**I1-G**

Refer to Supplemental Draft EIS Section 4.2.5.1 and Appendix J for the updated analysis. Revenue to Nottoway County was generated by the IMPLAN model using the following inputs, which would stimulate local tax collections: personal expenditures, local FASTC contract expenditures (non-payroll expenditures), and visiting trainee expenditures. Personal expenditures are derived from operational payrolls and are based on a measure of Personal Consumption Expenditures as provided by the Government Printing Office. Contract expenditures are associated with spending in categories such as vehicle and track maintenance, food services, off-site lodging, technology maintenance, and utilities. Trainee expenditures include incidentals, gifts and other miscellaneous purchases calculated based on the estimated time trainees would be expected to be free to frequent local business. All expenditure categories are provided in the Approach to Analysis section of the Economic and Fiscal Impact Studies Technical Report provided in Appendix J of the Supplemental Draft EIS.

<ul style="list-style-type: none"><li>• The facility will have a fitness center.</li><li>• Local schools are not over crowded, in Nottoway or Chesterfield County. Early, middle or high school students moving with their parents can be absorbed within existing schools.</li><li>• Blackstone, Crewe and Burkeville do not have a movie theater.</li><li>• The proposed number of employees at 1070 (presume 50% are related to training delivery), the number of school aged children can be considered minimal.</li><li>• Those that are hired from the local workforce with children are already "in the school system," and their economic impact is the variance from current to the incremental increase caused by their new employment.</li><li>• Nottoway is projected to lose population from the 2010 Census to the Census that will be taken for 2020.</li><li>• An unknown number of trainees will remain on-site over weekends (not training) and might venture off the FASTC site. This potential positive economic impact might be off-set by the adverse impact on the operation on-site at FASTC (especially food service).</li><li>• Those that are fortunate to gain employment or service contracts, in support of FASTC will generate a positive economic impact to the area.</li></ul> <p>The local area is fortunate to have the Foreign Affairs Security Training Center in our community. I appreciate the opportunity to reduce to writing my concerns voiced at the public forum and look forward to responses in the final package.</p> <p>Again, I support FASTC!</p> <p>Respectfully,</p>  <p>Erwin B. Abbott, Jr. (Sonny) 2149 Little Creek Road Crewe, Virginia 23930 434-774-7556 Email: sonnyabbott@aol.com</p>	<p><b>GSA Response</b> <b>I1-G</b> (Response provided on previous page.)</p>
---	--

COURIER-RECORD NEWS <news@courier-record.com> Fri, Oct 26, 2012 at 2:57 PM  
To: FASTC Team <fastc.info@gsa.gov>  
Thanks for the update....I've looked at report. RATHER EXTENSIVE. Well done.  
Most of my readers would prefer the diff note version of the answer to this question: "Y'ALL COMIN' or NOT?"  
:-)  
--Billy Coleburn, Courier-Record, Blackstone

12-A

**GSA Response**

**12-A**  
Comment noted.

In Re: Foreign Affairs Security Training Center in Nottoway County, Virginia  
Public Meeting for the Draft Environmental Impact Statement November 7, 2012

Page 3

1 P R O C E E D I N G S

2

3 MR. DUNCANSON: You're just going to love  
4 it here. And FASTC is a perfect fit. It's a  
5 military town. We love Pickett. And we love all  
6 the noise that comes with Pickett; the planes and  
7 the tanks and the 50 cal guns. We love it. It's  
8 just what we do here.

13-A

9 And FASTC, we're not even going to hear  
10 your pistols and your squealing tires. You don't  
11 need to worry about that. What you need to do is  
12 get busy and come on in.

13 MS. HASBROUCK: I've been attending all  
14 these meetings from the beginning, and I continue  
15 to fully support the project. And I'm looking  
16 forward to the impact it's going to have on our  
17 community.

18

19 (Hearing concluded, 8:30 p.m.)

20

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\* \* \* \* \*

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www.cavalier-reporting.com

Cavalier Reporting & Videography

(434) 293-3300  
production@cavalier-reporting.com

GSA Response

13-A

Comment noted.



## Comment Form FASTC Draft Environmental Impact Statement

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Please check here if you would **NOT** like to be on the Email/ mailing list \_\_\_\_\_

Please check here if you would like your name and Email/ mailing address kept private (i.e., not published in the Final EIS documents)

PLEASE PRINT CLEARLY AND LEGIBLY

Name: JOHN GLANCY Date: 11/7/12

Organization/Affiliation: \_\_\_\_\_

Email/Mailing Address: JTRK57@AOL.COM 402 TUNSTALL AVE

City, State, Zip Code: BLACKSTONE, VA. 23824

Comments: VERY INTERESTED IN GETTING IN ON  
GROUND FLOOR FOR CONST. TO LEAD INTO  
MAINTENANCE POSITION FOR FACILITY 14-A

### GSA Response

14-A

Comment noted.

Comment page repeated to maintain alphabetical order.

In Re: Foreign Affairs Security Training Center in Nottoway County, Virginia  
Public Meeting for the Draft Environmental Impact Statement November 7, 2012

Page 3

1 P R O C E E D I N G S

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15-A

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GSA Response

I5-A

Comment noted

**PUBLIC COMMENT ON FEDERAL REGISTER Fwd: why is the us govt spending out tax dollars on new buildings when so many buildings are vacant? and cheap to rent?**

jean public <jeanpublic1@gmail.com> Sun, Oct 28, 2012 at 9:17 AM  
 To: FASTC.INFO@gsa.gov, president@whitehouse.gov, speakerboehner@mail.house.gov  
 Cc: info@theteaparty.org, INFO@themsomestownteaparty.org, NCOLEMAN25@comcast.net

TAXPAYERS THINK THEY SHOULD RENT OR USE OPEN FACILITIES AT A MILITARY FORT. SEE NO NEED TO BUILD AND SPEND MILLIONS ON THIS FACILITY. GSA WAS THE ONE WHO SPENT LIKE DRUNKEN SAILOR AT CONFERENCE IN CALIFORNIA RECENTLY. WE NEED TO CUT COSTS. THIS IS NOT NECESSARY IN THIS SPENDING SPREE. THIS COMMENT IS FOR THE PUBLIC RECORD. JEAN PUBLIC

16-A

[Federal Register Volume 77, Number 208 (Friday, October 26, 2012)]  
 [Notices]  
 [Pages 65382-65383]  
 From the Federal Register Online via the Government Printing Office [www.gpo.gov]  
 [FR Doc No: 2012-26199]

GENERAL SERVICES ADMINISTRATION

[Notice-R03-2012-01; Docket No. 2012-0002; Sequence 23]

Notice of Public Meeting for the Draft Environmental Impact Statement for the Foreign Affairs Security Training Center in Nottoway County, VA

AGENCY: United States General Services Administration.

ACTION: Notice.

[[Page 65383]]

SUMMARY: Pursuant to the Council on Environmental Quality (CEQ) regulations, implementing the procedural provisions of the National Environmental Policy Act (NEPA), the U.S. General Services Administration (GSA) has prepared and filed a Draft Environmental Impact Statement (EIS) with the U.S. Environmental Protection Agency (EPA). GSA is the lead agency; cooperating agencies are U.S. Department of State (DOS), U.S. Army Corps of Engineers, EPA, and National Guard Bureau. The Draft EIS was prepared to evaluate the environmental impacts of site acquisition and development of the DGS, Bureau of Diplomatic Security, Foreign Affairs Security Training Center (FASTC) at the Virginia Army National Guard's Maneuver Training Center at Fort Pickett and Nottoway County's Pickett Park in Nottoway County, Virginia. The project would be developed on land currently operated or owned by the Virginia Army National Guard and Nottoway County. The purpose of the proposed FASTC in Nottoway County is to consolidate existing dispersed training functions into a single suitable location to improve training efficiency and enhance training operations. More detailed information on the FASTC program is available at <http://www.state.gov/recovery/FASTC>.

DATES: Comment date: The public may submit comments on the Draft EIS during a 45-day public review and comment period beginning October 26, 2012 with publication of this notice and ending on December 10, 2012. Instructions for submitting comments may be found under the heading

**GSA Response**

**16-A**

Diplomatic Security hard skills training is currently conducted at up to 11 different geographically dispersed leased and contracted facilities nationwide. A May 2008 report to Congress identified the need for a consolidated facility that would improve training efficiency and provide priority access to training venues that meet current facility standards.

Through an extensive site selection process, GSA and DOS have explored possible options for the use of existing government facilities. This process determined that the Fort Pickett/Nottoway County site was the only suitable location for FASTC. This determination was reaffirmed in 2013 by two independent federal government panels.