

FOREIGN AFFAIRS SECURITY TRAINING CENTER [FASTC]

An American Recovery and Reinvestment Act Project



UNITED STATES GENERAL SERVICES ADMINISTRATION RECORD OF DECISION UNITED STATES DEPARTMENT OF STATE FOREIGN AFFAIRS SECURITY TRAINING CENTER NOTTOWAY COUNTY, VIRGINIA



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**UNITED STATES GENERAL SERVICES ADMINISTRATION
RECORD OF DECISION
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1. Introduction

The United States General Services Administration (GSA) announces its decision to acquire a site and develop a United States Department of State (DOS), Bureau of Diplomatic Security (DS), Foreign Affairs Security Training Center (FASTC) at the Army National Guard Maneuver Training Center at Fort Pickett (Fort Pickett) and Nottoway County's Local Redevelopment Authority (LRA) area in Nottoway County, Virginia (FASTC Project). This Record of Decision documents the rationale for the decision.

GSA's decision is based on information and analysis contained in the Final Environmental Impact Statement (EIS) issued April 2015, the Supplemental Draft EIS issued January 2015, the Draft EIS issued October 2012, technical studies, and comments from Federal and state agencies, elected officials, organizations, and individuals. GSA's decision also considers DOS programmatic needs and the guiding principles of GSA's Design Excellence Program.

2. Purpose and Need for the Project

The purpose of the proposed FASTC Project is to consolidate existing dispersed hard skills security training functions to provide effective, efficient training specifically designed to enable foreign affairs personnel to operate in today's perilous and dangerous overseas environment. Hard skills training is practical, hands-on training in firearms, explosives, antiterrorism driving techniques, defensive tactics, and security operations. Such training improves security and life safety for the protection of U.S. personnel operating abroad.

The FASTC Project will fill a critical need, identified in the 2008 report to the U.S. Congress, for a consolidated training facility. A central facility will improve training efficiency and provide priority access to training venues from which DS may effectively conduct hard skills training to meet increased demand for well-trained personnel.

The proposed FASTC Project design must meet DOS programmatic needs and guiding principles and must also be vetted through GSA's Design Excellence Program. DOS will operate and maintain the training center when complete.

3. Alternatives Evaluated

3.1 Development of Alternatives

GSA and DOS have undertaken an extensive process in the search for a possible site for the FASTC Project. DOS began site alternative searches in 1993, and over a period of years included the evaluation of existing Federal facilities and military bases as potential locations. In 2009, DOS requested assistance from GSA to find a suitable site. Potential sites evaluated included Federal sites and private property. Since 2010, site searches focused on federally owned or publically held lands in accordance with President Obama's 2010 directive that Federal agencies try to use existing land and resources rather than purchasing or leasing new property. Throughout the search process, GSA and DOS evaluated more

than 70 alternative sites/locations for their potential to meet the needs of the DS training program, while having the least impact on the environment. In 2011, as a result of the evaluation process, GSA and DOS determined that only the Fort Pickett/Nottoway County site met the FASTC program requirements. From 2011 to 2012, 14 alternative alignments were evaluated on the Fort Pickett/Nottoway County site for their potential to minimize potential impacts on natural resources and the built environment resulting in several alternatives that were vetted through GSA's Design Excellence Program.

3.2 Alternatives Evaluated in the Draft EIS

Two build alternatives were carried forward and evaluated in the 2012 Draft EIS.

Build Alternative 1 included construction and operation of a Main Campus with dormitories and dining facilities, Firearms Training Ranges, Explosives Ranges, relocation of an existing Fort Pickett tank trail, a Mock Urban Environment Area, High Speed Driving Tracks, Off-Road and Unimproved Road Driving Courses, and Emergency Services. The site consisted of 1,300 acres on Fort Pickett Parcel 21/20 and Nottoway County LRA Parcel 9.

Build Alternative 2 consisted of the same construction and operations in an alternative site layout on an expanded, four-parcel site totalling 1,500 acres. In addition to Fort Pickett Parcel 21/20 and Nottoway County LRA Parcel 9, the proposed site included the Fort Pickett Grid Parcel and Nottoway County LRA Parcel 10.

In early 2013, all efforts and work on the proposed project at the Fort Pickett/Nottoway County site were put on hold pending additional due diligence and reviews at the existing Federal training site, Federal Law Enforcement Training Center in Glynco, Georgia. During this time period, DOS also assessed the scope and size of the FASTC project and determined a smaller platform was more fiscally prudent.

In April 2014, the earlier DOS selection of the proposed site for FASTC at Fort Pickett and Nottoway County was reaffirmed by the Administration. Based on adjustments made to the proposed FASTC scope of requirements, DOS prepared a Master Plan Update in 2014 that modified the alternatives evaluated in the 2012 Draft EIS. The Master Plan Update produced Build Alternative 3, which reduced the previous project development site from four parcels to three parcels totalling 1,350 acres. In January 2015, GSA published a Supplemental Draft EIS evaluating the 2014 Master Plan. The Draft EIS Build Alternatives 1 and 2 were no longer feasible for the reduced scope of the FASTC Project and were eliminated from further evaluation. The alternatives evaluated in the Final EIS are the No Action Alternative and Build Alternative 3.

3.3 Alternatives Evaluated in the Final EIS

No Action Alternative

Under the No Action Alternative, the FASTC Project would not be implemented, and DOS would continue training operations at existing dispersed contracted and leased training facilities. The parcels of land at Fort Pickett and Nottoway County being considered for the FASTC Project site would not be developed by GSA and DOS, and the existing land uses would remain.

Preferred Alternative

Build Alternative 3 is identified as the Preferred Alternative in the Supplemental Draft and Final EIS, and is generally based on the Draft EIS Build Alternatives 1 and 2, with modifications incorporated from the 2014 Master Plan Update. The site consists of 1,350 acres on Fort Pickett parcels 21/20 and Grid Parcel and Nottoway County LRA Parcel 9. The site includes temporary use of 12 acres between Parcel 21/20 and Dearing Avenue for relocation of a tank trail and scheduled use of 19 acres at Fort Pickett Range 8 for a total project site of 1,381 acres. The site allows DOS to take advantage of training synergies at Fort Pickett by sharing several complementary facilities and being contained within surrounding compatible land uses.

The Preferred Alternative eliminates much of the previously proposed main campus and living facilities proposed for the Draft EIS build alternatives. The Preferred Alternative reduces the total size of the venues, but still achieves the functionality of the FASTC Hard Skills Training Program. The major differences of The Preferred Alternative, as compared with Build Alternatives 1 and 2, are the locations of the administrative area (Core Area) and the consolidation, reduction, or elimination of several training venues and support facilities. The Core Area would be located on the Grid Parcel. The FASTC High Speed Driving Track, Off-Road/Unimproved Driving Course, Mock Urban Environment Area, Service Area, and Driver Training Maintenance Area would be located on LRA Parcel 9, and the Explosives Training Environment and Firearms Training Environment would be located on Parcel 21/20. The Preferred Alternative also includes an Ammunition Supply Point on LRA Parcel 9 and proposes the use of helicopters approximately one or two days per month to support emerging advanced tactical training needs.

The FASTC facility would train 8,000 to 10,000 students annually. Training would occur in classrooms and a fitness center, and would also include the following:

- High speed driving training consisting of 810 drive track operations per day with cars traveling up to 100 miles per hour and would include approximately 600 simulator (flash bang pyrotechnics) operations annually. Off-Road/unimproved driver training would consist of 24 operations per day (7 a.m. to 10 p.m.) plus 8 operations during the nighttime hours (10 p.m. to 7 a.m.).
- Mock urban tactical training including 36 driving operations per day on mock urban streets, one or two personnel insertion or evacuation training operations per month with a helicopter, climbing and rescue training on a multistory tower, mechanical and shotgun breaching, and burning building escape methods.
- Explosives training consisting of 2,783 detonations of 0.2-ounce to 1.5-pound net explosive weight (NEW) charges, 36 detonations of 2.23-pound NEW charges, and 18 detonations of 3-pound NEW charges per year. The explosives simulation alley in the Mock Urban Environment would use pyrotechnic charges, non-fragmenting high explosive charges up to 0.25 pound NEW, and would include 24 driving operations per day.
- Firearms training would include pistols, rifles, machine guns, and shotguns firing an estimated 6 million rounds annually.

The Preferred Alternative would require utility infrastructure improvements. Water and wastewater requirements would tie into the town of Blackstone's existing facilities, and additional water and sewer lines would be required for Parcel 21/20 and LRA Parcel 9. New electrical transmission lines would be required on Parcel 21/20, the Grid Parcel, and LRA Parcel 9, and a new separate primary power delivery system would be developed. Existing telecommunications infrastructure on LRA Parcel 9 and the Grid Parcel, including fiber optic lines and a fiber optic node, would be relocated.

Primary daily access to the FASTC Core Area by the majority of trainees and employees would be from U.S. Route 460 to Military Road. Personally operated vehicles and shuttle buses would proceed through the Fort Pickett Main Gate to West 10th Street, Dearing Avenue, and to the FASTC Core Area loop road off Dearing Avenue. Secondary access to the Core Area for a small percentage of vehicles would be from U.S. Route 460 to U.S. Route 460 Business (North Main Street) to downtown Blackstone to Virginia Route 40 (Darvills Road) and Military Road through the Fort Pickett Main Gate to the Core Area. Alternatively, secondary access may also be via North Main Street through downtown Blackstone to South Main Street to West Entrance Road, with entrance to Fort Pickett and Military Road at the West Gate.

The Preferred Alternative would incorporate impact minimization measures such as re-vegetation of cleared areas to be landscaped with native vegetation, site lighting designed to meet local or Federal "Dark Sky" guidelines limiting nighttime light pollution and glare, 100-foot wetland buffers, perpendicular stream crossings to reduce wetland impacts, and best management practices for stormwater.

The Preferred Alternative would be designed in five separate packages and constructed in three to five phases, depending on funding, over a five-year period beginning in 2015. It is anticipated that the FASTC facility will be 10% operational in 2016 and would be fully operational in 2020. FASTC would be staffed, managed, and maintained by 339 employees.

4. Public Comments

Individuals, groups, and agencies were provided several opportunities to provide comments during the EIS process. Comments received during the 30-day scoping period for the Draft EIS in October 2011 and the Supplemental Draft EIS in September 2014 were considered in the identification of key issues requiring analysis. The 45-day public comment period for the Draft EIS was open from October 26, 2012 to December 10, 2012. GSA's responses to comments on the Draft EIS were provided in the Supplemental Draft EIS. The 45-day public comment period for the Supplemental Draft EIS was open from January 9, 2015 to February 23, 2015. GSA's responses to comments on the Supplemental Draft EIS were provided in the Final EIS.

GSA considered comments received during the 30-day public review period for the Final EIS. Several comments were similar to those received on the Supplemental EIS and therefore were previously considered and addressed in the Final EIS. One comment letter was received with comments warranting specific responses addressed below:

Comment 1: “BSR asserts that the Final EIS does not faithfully comply with the requirements of the National Environmental Policy Act (NEPA) for avoidance of environmental impacts. Notwithstanding the Presidential directive for use of federal facilities on property already owned by the government, in this instance that directive is in contravention of the statutory requirements under NEPA. When the Department of State reduced the scope of the proposed FASTC project to confine the new facility to one that provides solely hard skills training, the justification for the project became invalid.”

Response to Comment 1: The justification for a proposed centralized FASTC remains valid despite the noted reduction in project scope. As identified in Chapter 1 of the Final EIS, the proposed FASTC is required to meet a critical need, identified in the 2008 report to the U.S. Congress, for a consolidated training facility. Consolidation of 11 separate and dispersed leased and contracted hard skills training facilities into a central, purpose-built, dedicated DOS facility would eliminate current challenges of : (1) not having a dedicated DOS training facility; (2) continually experiencing scheduling conflicts and resulting inefficiencies; (3) higher costs; (4) decreased productivity; and (5) need to periodically postpone or cancel training courses due to competition for time and space from activities conducted by other federal agencies.

Comment 2: “Adequate capacity is readily available at Summit Point to permit further expansion of hard skills training with no, or minimal, environmental impact. Failure to thoroughly and properly consider the retention of these services at Summit Point in light of the reduced project scope is a violation of NEPA requirements for alternative analysis and avoidance of environmental impacts.”

Response to Comment 2: After GSA and DOS conducted an extensive process to select a site, it was determined that the Fort Pickett/Nottoway County site was the only suitable site for FASTC. The FASTC EIS included a robust analysis of alternatives as documented in Chapter 2 and Appendix B of the Final EIS. The reduced scope project focusing on hard skills training does not change the alternatives analyses nor the conclusion that the Fort Pickett/Nottoway County site is the only site that meets the purpose and need of the proposed action.

Comment 3: “Moreover, the construction of FASTC at Ft. Pickett ‘would require the clearing of approximately 407 acres of forest, grass, and shrub(s)’ as detailed in the Final EIS; BSR contends that such environmental impacts are unjustifiable given the reduced scope of the FASTC project.”

Response to Comment 3: As documented in the Final EIS, considerable efforts were made to avoid and reduce environmental impacts to the extent practicable. In addition, Best Management Practices will be used to reduce environmental impacts during construction and required mitigation and monitoring procedures are included in this Record of Decision to further minimize adverse impacts to the environment.

Comment 4: “Further, the new regulations promulgated by the U.S. Environmental Protection Agency and the U.S. Army Corps of Engineers that expands the definition of Waters of the United States to include tributaries and ephemeral streams will necessitate a significant revision of the EIS. It is beyond question that features at the Nottoway county site that would not have been defined as federal jurisdictional waters clearly will now be defined as such. The Final EIS must be revised to fully explain the mitigation measures that will be taken to compensate for the loss of these aquatic resources.”

Response to Comment 4: A detailed wetland delineation was undertaken to identify Waters of the U. S. subject to jurisdiction by the USACE and Virginia Department of Environmental Quality under the Clean Water Act. The delineation efforts included wetlands, streams/tributaries (perennial, intermittent, and ephemeral drainage ways) as well as any isolated wetlands. The delineation was confirmed by the USACE and Virginia Department of Environmental Quality. The U.S. Environmental Protection Agency and USACE Proposed Rule to Define “Waters of the United States” referred to in the comment is not yet final. Further, the proposed rule also states that it: “does not protect any new types of waters that have not historically been covered under the Clean Water Act.” The jurisdictional limits would not change under the proposed rule. The Final EIS discusses wetland impact mitigation and notes that a permit will be secured for any unavoidable impacts to Waters of the U. S. The permit will include appropriate mitigation to compensate for those unavoidable impacts.

5. Decision

Based on consultation with cooperating agencies and consulting agencies; consideration of potential environmental consequences; DOS training needs, required proximity and synergies with partner agencies; technical, safety, and security considerations; availability of resources; and public comments on the Draft, Supplemental Draft, and Final EIS; it is my decision, as GSA Public Buildings Service Commissioner, to select the Preferred Alternative (Build Alternative 3), development of the FASTC Project at the Fort Pickett/Nottoway County site in Nottoway County, Virginia.

The Preferred Alternative best meets the need for consolidating existing dispersed hard skill training functions to meet increased demands for well-trained security personnel. Alternatives were vetted through GSA’s Design Excellence Program to ensure that the project would be consistent with the guiding principles for the development of Federal facilities. The Preferred Alternative would provide a connection and adjacency between site parcels; this would promote functional efficiency and ensure compatibility of adjacent land uses. The Preferred Alternative site plan provides an opportunity to reduce impacts to wetlands and vegetation as compared with the Draft EIS alternatives, maximize the use of site topography, and enable reuse of the existing street grid and stream crossings. The Preferred Alternative would also have beneficial economic and fiscal impacts in the town of Blackstone, Nottoway County, and the adjacent counties in the region.

After carefully weighing all these factors and analyzing data presented in the Final EIS, I have determined that the Preferred Alternative best meets the FASTC Project’s purpose and need while minimizing potential environmental impacts to the greatest extent possible; therefore, the Preferred Alternative is the Selected Alternative.

6. Environmental Consequences of the Selected Alternative

The Selected Alternative will have the following environmental consequences. The No Action Alternative would have no environmental consequences, except where noted below.

- *Water Resources, Vegetation, and Soils:* The Selected Alternative will have direct adverse impacts to approximately 5.8 acres of wetlands, 2,500 linear feet of streams, 366 acres of forest,

41 acres of shrub/grass land, 400 acres of soils, and will add 138 acres of impervious surfaces. Additional measures to avoid and/or minimize impacts to water resources will be incorporated into the facility design to the extent feasible. Unavoidable wetlands and stream impacts will be mitigated through purchase of mitigation credits; therefore, these impacts will not be significant.

- *Biological Resources:* The Selected Alternative “may affect, is likely to adversely affect,” the Federal threatened northern long-eared bat (*Myotis septentrionalis*). GSA consulted with the U.S. Department of Interior - Fish and Wildlife Service (USFWS) under Section 7 of the Endangered Species Act (ESA), and conservation measures for minimizing adverse effects were included in the Final EIS. The USFWS issued a Biological Opinion specifying non-discretionary terms and conditions for compliance with the Endangered Species Act. The Biological Opinion can be viewed online at <http://www.state.gov/recovery/fastc>. The Selected Alternative will have no adverse effects on state or other Federal threatened or endangered species or result in takes, as defined under the Bald and Golden Eagle Protection Act. With proposed impact minimization measures, impacts to threatened and endangered species will not be significant.
- *Cultural Resources:* The Selected Alternative will have no adverse effect on historic properties protected under the National Historic Preservation Act. In accordance with Section 106 of the National Historic Preservation Act, GSA consulted with the State Historic Preservation Officer (SHPO) of the Virginia Department of Historic Resources, the Catawba Indian Nation, United Keetoowah Band of Cherokee Indians, Cheroenhaka (Nottoway) Indian Tribe, and the Nottoway Indian Tribe of Virginia. The SHPO concurred on GSA’s findings of effect in correspondence dated April 2, 2015 (Final EIS Appendix E) and May 5, 2015 (available online at <http://www.state.gov/recovery/fastc>).
- *Air Quality:* Air emissions from the Selected Alternative would be well below the air quality impact significance thresholds and would not have a significant impact on the local or regional air quality. Fugitive dust from land disturbance activities would be the primary source of emissions during construction. These emissions are predicted to be greatest in 2016; however, they would remain well below significance thresholds. Greenhouse gas emissions for the stationary sources would be well below the 25,000 metric tons per year threshold established by the Mandatory Greenhouse Gas Reporting Rule.
- *Noise:* The Selected Alternative will have short term construction-related noise impacts. There will be long term minor noise impacts as a result of a minor increase in the frequency of peak explosive noise events as compared with the Fort Pickett baseline, most noticeably in the area northwest of the Fort Pickett boundary. There will also be minor noise impacts from one or two helicopter operations per month at the Mock Urban Tactical Training Area and operations on the driving tracks.
- *Land Use and Zoning:* The town of Blackstone has found no conflict with the proposed FASTC Project relative to its conservation and development plans. Likewise, the Nottoway County

Board of Supervisors has found no conflict between the County's Comprehensive Plan and the FASTC Project.

- *Socioeconomic Environment and Environmental Justice:* The Selected Alternative will have beneficial socioeconomic impacts in the eight-county study area, centered on Nottoway County and including seven other adjacent counties in the region. The economic analysis indicated that the construction and operation of FASTC will generate direct FASTC-related jobs and indirect/induced jobs in the economy, and will also produce labor income and economic output. Business growth may be stimulated by the FASTC Project in the town of Blackstone and Nottoway County. The FASTC Project's potential beneficial impacts would not be realized with the No Action Alternative. There are no adverse environmental impacts that will have disproportionately high or adverse environmental effects on minority or low-income populations.
- *Traffic and Transportation:* The Selected Alternative will not have significant adverse traffic impacts and will not impact the capacity of intersections or the Fort Pickett Main Gate during the a.m. or p.m. peak periods. The turning lane analysis determined that the additional project traffic will result in the existing turning lane storage being less than Virginia Department of Transportation (VDOT) design standards at the intersection of U.S. Route 460/Cox Road. Under the No Action Alternative (without the FASTC Project), the existing turning lane storage would also be less than VDOT design standards at the intersections Cox Road/Military Road and Darvills Road/Military Road by 2018. There will be no adverse impact on transportation services.
- *Recreation:* The Selected Alternative will have an adverse impact to recreational hunting access during the training schedule, and minor light and noise impacts on the adjacent Nottoway County Pickett RV Park.
- *Utilities:* The Selected Alternative will have a moderate impact on utilities. The town of Blackstone maintains a water and wastewater treatment capacity reserve in the event Fort Pickett becomes fully mobilized. Total demand for potable water for FASTC is not estimated to exceed the existing permitted capacity of the town of Blackstone water treatment plant. However, in the event of a full Fort Pickett mobilization scenario, the existing permitted capacity of the wastewater treatment plant will not be sufficient to handle the projected cumulative flows from Fort Pickett, the FASTC Selected Alternative, and other reasonably foreseeable future projects.
- *Public Health and Safety:* The Selected Alternative will have no adverse impacts on the police department, but may have moderate adverse impacts to fire emergency response times if multiple fire emergencies occur simultaneously. There will be minimal potential for impacts to public safety from training operations and no direct or indirect impacts to environmental health or risk of transmission of notifiable diseases.
- *Aesthetic and Visual Resources:* There will be minor changes to aesthetics and visual resources, but impacts will be minimized by maintaining forested buffers.

- *Hazardous Substances:* The Selected Alternative will have no adverse hazardous substances impacts. Procedures will be in place for safe handling, use, and disposal of existing or introduced hazardous substances and waste during demolition, construction, and operations.

7. Environmentally Preferable Alternative

Of the build alternatives evaluated in the Draft, Supplemental Draft, and Final EIS, the Environmentally Preferable Alternative is the Selected Alternative (Build Alternative 3). I selected this alternative because it best meets the FASTC Project's purpose and need while resulting in the least adverse environmental consequences.

If Build Alternatives 1 and 2 still met the FASTC Project's purpose and need, then in comparison to Build Alternative 3, Build Alternatives 1 and 2 would have resulted in a larger area of disturbance with greater impacts to wetlands, streams, vegetation, and soils. Build Alternatives 1 and 2 also would have had a higher level of beneficial economic impacts, including jobs and economic output, but would have generated less business growth in the local area.

8. Avoidance, Minimization, and Mitigation Measures

All practicable means of avoiding, minimizing, or mitigating adverse environmental consequences of the selected alternative were adopted and are described below. Measures that would mitigate adverse environmental consequences that were NOT adopted, because they were determined not to be practicable, are identified in the following section on Traffic and Transportation.

The following avoidance, minimization, and mitigation measures will be implemented.

8.1 Climate

1. Incorporate energy efficient design, resulting in reduced greenhouse gas emissions. Pursue the U.S. Green Building Council's Leadership in Environmental and Energy Design (LEED) Silver certification for FASTC Core Area buildings A01 and T01.

8.2 Topography, Geology, and Soils

1. Minimize grading and filling to the extent feasible.
2. Comply with the regulatory requirements of the Clean Water Act (CWA) (Sections 319 and 401), the Virginia Stormwater Management Program, and the Virginia Erosion and Sediment Control Program.
3. Use best management practices (BMPs) for erosion and dust control, including application of water or gravel during construction and operation activities.

8.3 Water Resources

1. Orient stream crossings perpendicular to the stream channel.

2. Use suitably sized culverts or bridges, as appropriate, to maintain efficient peak flow and minimize stream impacts.
3. Avoid disturbance of the 100-foot wetland and stream buffer to the extent feasible.
4. Incorporate Low Impact Development measures and stormwater BMPs into the facility design to minimize stormwater runoff.
5. Comply with Energy Independence and Security Act of 2007 (Section 438); CWA; the Virginia Stormwater Management Program; and the Virginia Erosion and Sediment Control Program.
6. Comply with regulations and plans for the transport, storage, use, and disposal of petroleum, oil, and lubricants, hazardous waste, pesticides, and fertilizers, including, the Oil Pollution Act of 1990, Resource Conservation and Recovery Act (RCRA), Federal Insecticide, Fungicide and Rodenticide Act, U.S. Department of Transportation regulations (49 Code of Federal Regulations [CFR], Subtitle B, Chapter 1, Subchapters A-C); Occupational Safety and Health Administration (OSHA) regulations (29 CFR 1910, Subpart H).
7. Avoid and minimize wetland impacts where practicable.
8. Mitigation measures for unavoidable wetland and stream impacts will be documented in a CWA Section 404/401 Joint Permit Application, and will include one or more of the following mechanisms:
 - a) Purchase credits from an approved wetland and stream mitigation bank within the Chowan Basin. GSA will purchase mitigation credits for impacted forested wetlands at a ratio of 2 credits for 1 acre of impact. Stream mitigation requirements would be determined by the U.S. Department of Defense - Army Corps of Engineers (USACE) and Virginia Department of Environmental Quality's Unified Stream Methodology.
 - b) "In Lieu Fee" payment to the Virginia Aquatic Resources Trust Fund managed by the Nature Conservancy.

8.4 Biological Resources

Vegetation

1. Minimize impacts to existing vegetation using the following measures:
 - a) **Avoid Disturbance Whenever Possible:** Preserve as much existing vegetation as practicable.
 - b) **Treat Disturbed Edges:** Where existing woodland/forest is disturbed and cleared areas will be landscaped, new woodland-edge vegetation (early succession trees, shrubs, grasses) will be planted, where feasible, along the disturbed edges to re-establish a more natural edge to forest, create corridors for wildlife movement where practicable, and prevent invasive species from establishing along disturbed edges.
 - c) **In Disturbed Areas, Re-Establish Appropriate Native Plant Communities:** In areas that will require a heavy amount of clearing and will be landscaped, plant communities native to the central Piedmont – including oak/hickory and pine/oak woodland, loblolly pine/oak savanna, shrub land, and grassland – will be utilized to re-vegetate disturbed areas where feasible. These plant communities will be tailored to both the cultural requirements of the

site and the programmatic requirements of training mission. Estimates are approximately 180 acres of vegetation will be restored, including approximately 87 acres of forest.

- d) **Connect Plant Communities Across Larger Areas:** Connect re-established plant communities of the same type across larger areas of the site, where feasible, to create and preserve corridors for the movement of wildlife and “deeper” habitats required by interior dependent species.

Threatened and Endangered Species, Bald Eagle, and other Wildlife

1. Minimize the amount of sediment that may enter surrounding wetlands and surface waters resulting in impacts to fish and other wildlife that live in or utilize the surface waters through compliance with the CWA, the Virginia Stormwater Management Program and the Virginia Erosion and Sedimentation Program.
2. Site lighting will be designed to meet local or Federal Dark Sky guidelines to minimize operational lighting impacts on nocturnal wildlife.
3. Avoid construction within the 660 foot buffer of the bald eagle nest to comply with the Bald and Golden Eagle Protection Act. Coordinate with the USFWS if activities will occur within the buffer.
4. Incorporate *Conservation Measures* in project design and comply with *Terms and Conditions* implementing the *Reasonable and Prudent Measures* specified in the USFWS Biological Opinion for project effects on the federally listed threatened northern long-eared bat (*Myotis septentrionalis*; NLEB) in accordance with Section 7 of the Endangered Species Act (16 U.S.C. 1531-1544, 87 Stat. 884), as amended, as follows:
 - a) **NLEB Conservation Measures:** Conservation measures are actions a Federal agency includes as an integral part of its proposed action and that are intended to avoid and minimize effects of the action on a listed species.
 - 1) In order to avoid and minimize direct effects to female NLEBs (pregnant, lactating, and post-lactating) and juvenile NLEBs (non-volant and volant) during the summer maternity season (April 15 through September 15), site clearing (i.e., vegetation removal) for Construction Packages 2, 3, 4, and 5 will be conducted October 1 through March 31. Under Package 1, approximately 9 acres of potential forested habitat will be cleared from August 1 through September 30, when pups are volant (i.e., capable of flying).
 - 2) In order to maintain potential summer maternity habitat within the action area, where possible and not a safety hazard or an obstacle to project construction, dead or dying trees will be allowed to remain in the action area. Suitable NLEB roosts are trees (live, dying, dead, or snag) with a diameter at breast height of 3 inches or greater that exhibit any of the following characteristics: exfoliating bark, crevices, cavity, or cracks. Isolated trees are considered suitable habitat when they exhibit the characteristics of a suitable roost tree and are less than 1,000 feet from the next nearest suitable roost tree within a woodlot, or wooded fencerow.

- 3) Existing vegetation will be preserved wherever possible. Areas that have been cleared under the FASTC Project, and need to be landscaped after construction of proposed facilities, will be planted with native plant communities indigenous to the central Piedmont and woodland-edge vegetation (e.g., early successional trees, shrubs, and grasses) will be planted along disturbed edges. The reestablished plant communities will be tailored to the programmatic requirements of the training mission. These plantings will reestablish a natural edge to the forest, create corridors for wildlife movement, and prevent invasive species from establishing along disturbed edges. Approximately 180 acres of vegetation will be reestablished, of which approximately 87 acres will be forest. Approximately 10 acres of vegetation will be reestablished on Parcel 21/20 and 170 acres will be reestablished on LRA Parcel 9.
- 4) To avoid potential impacts to wetlands and surface waters, during the development and planning process, multiple alternatives were created and discounted due to the potential magnitude of wetland and stream encroachments. The alternatives development incorporated a 100-foot buffer zone on either side of wetlands and streams as an area to be avoided to the maximum extent practicable. The proposed action has incorporated wetland avoidance and impact minimization to the extent practicable during the planning phase. Under the proposed action, proposed project components have been sited as far upstream in the watersheds as possible to avoid and minimize impacts to larger perennial streams. All buildings and stormwater management facilities will be located outside of wetland limits.
- 5) In conjunction with final design, a Stormwater Pollution Prevention Plan (SWPPP) will be prepared to avoid and minimize impacts to nearby surface waters. The SWPPP will include BMPs for erosion and sedimentation controls, including techniques to diffuse and slow the velocity of stormwater to reduce potential impacts (e.g., soil loss and sedimentation) to water quality during construction. All construction site equipment servicing and maintenance areas will be at least 300 feet away from waterbodies (e.g., wetlands, streams). All construction activities with the potential of impacting water quality due to potential runoff from the site will be conducted in accordance with SWPPP requirements. GSA will provide the Draft SWPPP to USFWS for review and comment.
- 6) To the maximum extent practicable the following preventive measures will be implemented:
 - a. The perimeter of all areas to be disturbed during construction or maintenance activities will be clearly demarcated using flagging or temporary construction fence, and no disturbance outside that perimeter will be authorized. All access routes into and out of the proposed disturbance area will be flagged, and no construction travel outside those boundaries will be authorized. When available, areas already disturbed by past activities or those that will be used

later in the construction period shall be used for staging, parking, and equipment storage.

- b. Materials such as gravel or topsoil will be obtained from existing developed or previously used sources, not from undisturbed areas adjacent to the property.
 - c. When vehicles or equipment are being refueled during construction, drip pans will be used underneath all construction equipment and containment zones will be established.
 - d. Non-hazardous waste materials, litter, and other discarded materials, such as construction waste, will be contained in secured containers until removed from the construction site. All trash containers will have secured closures to prevent animal foraging.
- 7) To avoid and minimize importation of non-native plant and animal species onto the site, construction contractors will be required to inspect and clean all construction equipment and vehicles prior to any construction activity within the action area. All construction equipment and vehicles will be inspected to ensure that hydraulic fittings are tight, hydraulic hoses are in good condition and replaced if damaged, and there are no petroleum leaks.
 - 8) Wildfire prevention measures will be implemented, including restricting smoking to areas clear of vegetation, ensuring no fires of any kind are ignited, and equipping vehicles with spark arrestors and fire extinguishers.
 - 9) Requirements for safe handling and disposal of hazardous wastes will be implemented.
 - 10) To maintain and blend with the character of the surrounding rural environment, site lighting will be designed to meet local or Federal Dark Sky guidelines limiting nighttime light pollution and glare. Hooded lights will be used to the maximum extent practicable at all new roads and facilities within and adjacent to forest habitat. Illumination of forest will be kept to an absolute minimum.
 - 11) All outdoor construction activities will be conducted during daylight hours in known or suitable summer habitat to avoid harassment of foraging NLEBs (April 15 through September 15).

b) USFWS Reasonable and Prudent Measures and Terms and Conditions for NLEB:

In its Biological Opinion for effects on the federally threatened NLEB, USFWS stipulated the following Reasonable and Prudent Measures to minimize take. ("Take" is defined as to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture or collect, or to attempt to engage in any such conduct.)

Reasonable and Prudent Measures

- 1) Minimize noise levels during construction activities.

Terms and Conditions

To be exempt from the prohibitions of Section 9 of the Endangered Species Act, GSA must comply with the following non-discretionary *Terms and Conditions*, which implement the above *Reasonable and Prudent Measures* and outline required reporting/monitoring requirements.

- 1) Implement all practicable measures to reduce noise levels in the construction zone.
- 2) Operators, employees, and contractors associated with site preparation for and construction of the FASTC must be educated on the biology of the NLEB, activities that may affect the NLEB, and ways to avoid and minimize these effects prior to working on site.
- 3) Provide an annual report to the USFWS summarizing the acres of trees cleared, timeframe in which they were cleared, and forest cover type no later than December 31 of each year until all construction and vegetation planting is complete. A final digital report of the total acreage cleared and the forest type cleared should be sent to the USFWS via the contact email provided below.
- 4) Care must be taken in handling any dead specimens of proposed or listed species to preserve biological material in the best possible state. In conjunction with the preservation of any dead specimens, the finder has the responsibility to ensure that evidence intrinsic to determining the cause of death of the specimen is not unnecessarily disturbed. The finding of dead specimens does not imply enforcement proceedings pursuant to the ESA. The reporting of dead specimens is required to enable the USFWS to determine if take is reached or exceeded and to ensure that the terms and conditions are appropriate and effective. Upon locating a dead specimen, notify the USFWS Virginia Law Enforcement Office at 804-771-2883 and the USFWS Virginia Field Office at 804-693-6694.

8.5 Cultural Resources

1. Operations using simulators (flash bangs) will not occur within 656 feet (200 meters) of the Officers Club adjacent to the southern boundary of LRA Parcel 9.
2. Brief construction contractors on archaeological sites to avoid any inadvertent discoveries procedures. Contractors must use protective fencing to prevent access across sites 44NT0219 and 44NT0220. DOS will incorporate Fort Pickett's training and inadvertent discoveries standard operating procedures into FASTC standard operating procedures.
3. Should future FASTC Project design result in potential impacts to Sites 44NT0210, 44NT0212, 44NT0219, 44NT0220, 44NT0221, or 44NT0222, GSA would conduct Phase II testing and evaluation and additional National Historic Preservation Act Section 106 consultation.

8.6 Air Quality

1. BMPs, such as periodic wetting of soils and various other dust control measures, will be implemented to minimize fugitive dust emissions during FASTC construction and operation.

8.7 Noise

1. Construction activity will be limited to daytime weekday hours to the extent feasible to minimize impacts to surrounding areas and along the routes of construction vehicle travel.
2. The use of vegetative buffers will be incorporated into the FASTC design to the extent feasible to minimize noise impacts to the surrounding areas.
3. Simulator operations will not occur within 656 feet (200 meters) of the Officers Club.
4. To be in regulatory compliance with Federal OSHA 1910.95, FASTC demolition (explosives and simulators) training, and firing ranges (small caliber firearms), will provide hearing protection to personnel working and training at these sites during live operations.
5. Other measures to minimize impacts that will be considered to the extent feasible will be implementation of a process to notify the public, including the daycare center at the Officers Club, in advance of peak noise events.

8.8 Land Use and Zoning

1. Compliance with the U.S. Department of Defense criteria regarding runway clear zones and accident potential zones. Dust and glare will be limited in these zones to avoid impacts to air navigation.
2. Form 7460-1 Notice of Proposed Construction or Alteration will be submitted to the U.S. Department of Transportation - Federal Aviation Administration (FAA) for a formal determination that the proposed project will not constitute a hazard to air navigation.

8.9 Socioeconomic Resources and Environmental Justice

1. Impacts to displaced residents and businesses will be minimized via compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act, which will provide assistance to approximately 5 residences and 11 businesses displaced by the FASTC facility.
2. Protections for the safety of children include security measures such as drop bar gates and signage to discourage accidental entry to training areas.
3. Work with Nottoway County to ensure continued supervisory control of children attending the daycare center.
4. A joint effort of GSA's Urban Development/Good Neighbor program and U.S. Environmental Protection Agency's Community Assistance and research expertise will coordinate with and assist local officials and planners in preparing for FASTC-related economic effects. Where feasible, GSA will also seek to identify potential resources that may assist local planners in this effort.

8.10 Traffic and Transportation

1. Abandonment of the VDOT maintained roadways within LRA Parcel 9 in coordination with VDOT and the Nottoway County Board of Supervisors will be required.
2. Design the Entry Loop road to accommodate and efficiently process vehicles approaching the Core Area. Where queues may form, sufficient storage will be provided to avoid blocking adjacent lanes and prevent vehicles from stacking onto Dearing Avenue.
3. To address VDOT turning lane storage criteria deficiencies, recommend that VDOT study these intersections, and if warranted, study potential improvements to bring the intersections up to VDOT design standards. This mitigation measure is not practicable or consistent with existing laws, regulations, and authorities applicable to GSA. GSA and DOS have no funding for roadway improvements outside property boundaries. Any intersection improvements identified 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. Following are the improvements that may be warranted:
 - a) Cox Road/Military Road – (with or without the Selected Alternative) new exclusive westbound left turn lane, including storage and taper.
 - b) Darvills Road/Military Road – (with or without the Selected Alternative) extend the existing eastbound right turn lane storage and taper.
 - c) U.S. Route 460/Cox Road (with Selected Alternative) – extend the existing westbound left turn lane storage and taper.

8.11 Recreation

1. Minimize hunting access impacts, to the extent feasible, by allowing hunting access to Parcel 21/20 and LRA Parcel 9 to the extent practicable between training operations.

8.12 Utilities and Infrastructure

1. Minimize utility installation impacts for water, wastewater, electrical, and telecommunication lines by constructing within existing or new roadways or utility corridors to avoid additional areas of disturbance.
2. Reduce water demand through use of ultra-low flow fixtures, rain collection, grey water, native plant species in non-irrigated landscaping, and avoidance of permanent irrigation.
3. Minimize impact to area landfills via compliance with the Pollution Prevention Act and Executive Order 13101 *Greening the Government through Waste Prevention, Recycling, and Federal Acquisition*.

8.13 Public Health and Safety

1. Install safety features such as drop bar gates and signage, in compliance with GSA Facilities Standards for Public Buildings.

2. Comply with Federal regulations regarding the management of hazardous materials and waste (Comprehensive, Environmental Response, Compensation and Liability Act [CERCLA], RCRA, Toxic Substances Control Act [TSCA], Oil Pollution Act, Pollution Prevention Act).
3. Comply with U.S. visa immunization and health requirements.
4. Training areas will be designed to contain all training activities within the site such as explosives, small arms munitions, and cars on the driving tracks so that there will be no impact to public safety.
5. Helicopter pilots participating in training operations at FASTC will follow all Government agency standard operating procedures, and FAA and Fort Pickett aviation regulations.

8.14 Aesthetic and Visual Resources

1. Maintain vegetative buffers around newly developed areas and parcel borders to the extent practicable to minimize visual impacts.

8.15 Hazardous Substances

1. Remove and properly dispose of containerized pesticides, herbicides, paints, solvents, and petroleum products prior to demolition of structures.
2. Comply with Federal regulations CERCLA, RCRA, TSCA, Oil Pollution Prevention Act.
3. GSA will confirm U.S. Department of Defense - Army responsibility for future remediation of methyl tertiary butyl ether (MTBE) in the groundwater on LRA Parcel 9 if remedial action is required.
4. Address all known release areas or areas requiring further investigation that would present an environmental and/or human health risk prior to site development.
5. Incorporate detention basins and manufactured BMPs (i.e., filtration systems) for stormwater control and use treatments and/or chemical amendments, such as lime, to increase the pH of the soil to degrade any harmful residual explosive compounds.

9. Mitigation, Monitoring and Enforcement Program

GSA will implement a Mitigation, Monitoring, and Enforcement Program (MMEP) to ensure that the proposed avoidance, minimization, and mitigation measures identified above are implemented as part of the FASTC Project. The MMEP will identify the timing, responsibility, and method of implementation of the proposed measures, as well as any required monitoring and enforcement activities. As part of this program, each project contractor will be required to implement the mitigation measures arising from its project activities. GSA or its authorized agents will inspect and monitor these measures to ensure compliance. Any operation mitigation measures will be implemented by GSA. The MMEP will be maintained by GSA throughout FASTC Project implementation and will be included as part of the administrative record of the FASTC project. Any continuing obligations will be maintained by DOS.

Signature:



Norman Dong
GSA Public Buildings Service Commissioner

Date: May 26, 2015