



OFFICE OF THE CITY MANAGER

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August 13, 2008

Fort Belvoir BRAC
Attention: BRAC 133 EA Comments
10306 Eaton Place, Suite 340
Fairfax, Virginia 22030

Dear Sir or Madam:

This letter responds to the opportunity for the stakeholders and the public to comment on the final Environmental Assessment (EA) and draft Finding of No Significant Impact (FONSI) in regard to BRAC 133 and its planned relocation of the Department of Defense's Washington Headquarters Service of up to 1.8 million square feet of office space to one of three short-listed sites in Northern Virginia. The City of Alexandria will limit our comments to the two sites in the City of Alexandria, sites we know well. We do not think it productive to the EA process to provide negative comments on the GSA site, which is not in our jurisdiction.

The City of Alexandria supports the location of the Washington Headquarters Service (WHS) to either the Mark Winkler or to the Victory Center site. Both sites are quality locations which can well meet WHS requirements now and far into the future. The City of Alexandria has been home to federal operations for over 200 years (and, if one surveyed federal users, you would find they are very satisfied with their location within the City). Most recently, the relocation of the U.S. Patent and Trademark Office to Alexandria (which required the planning and construction of 2.5 million square feet of office space within contractual time constraints) was managed as a partnership between the City, the developer, and the federal government, which enabled the facility to be constructed on time and within budget.

The following comments on the key EA Resource Areas are provided:

Land Use: Both the Victory Center site and the Mark Center site have been subject to in-depth land use consideration processes, and the approved zoning ordinance contemplates significant office development in those areas. The Alexandria City Council has supported and supports the development of these two sites with the approximate 1.8 million square feet of office space as contemplated in both the WHS proposals. In regard to future expansion capability for WHS, or related private office use: (1) the Victory Center is surrounded by low density flex office/warehouse space which the City contemplates being able to be redeveloped at much

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higher densities to meet substantial additional office demand, and (2) the Mark Center site has approximately 1.4 million square feet of existing office space which could be made available to meet future office demands.

Transportation: When the Victory Center site and the Mark Winkler Center sites were considered by the City, transportation studies were undertaken in order to determine how the needed road capacity compared with what capacity was planned or contemplated. While the Virginia Department of Transportation believes that additional traffic analyses of these two sites is warranted, the City is satisfied that the prior analyses which have met the City's rigorous standards sufficiently considered the impact of a WHS-sized facility on local roads. These studies have been recently updated. With the adjacency of these sites to the interstate highways (I-95 and I-395), which are both being improved, it is difficult to see how further studies are needed beyond what VDOT has already undertaken.

Because the WHS site is a relocation of employees, many of whom already travel the I-95 and I-395 corridors, we agree with the conclusion of the EA that the dissipation of the traffic to either of the Alexandria sites is such that the impact to the regional roadway network is manageable. In fact, the relocation of the WHS represents a major opportunity to reduce single occupancy vehicle (SOV) trips. Finally, the density of proposed office development at both sites in Alexandria is consistent with the Metropolitan Washington Council of Governments transportation modeling, which assumed a density of job growth similar to the WHS projected 6,409 employees.

The City is also in the initial stages of implementing a planned doubling of the service and capacity of our City-sponsored DASH bus system. We have started construction of a new DASH bus maintenance facility, which is the first step in this process. This expansion will improve the connectivity of these two sites with the rest of the City, as well as to the Metrorail system.

We fully understand the need for all of the local road infrastructure to be in place by September 15, 2011 (the legislatively mandated BRAC deadline), which is the time WHS needs to be able to move to their new offices at whatever site is selected. Only one of the two Alexandria sites will require additional road capacity to be constructed, and that can occur by the BRAC deadline date.

In the case of the **Victory Center** site, sufficient existing roadway capacity already is in place (Eisenhower is a four-lane avenue with significant underutilized road capacity). No new roadway construction will be needed with the Victory Center site, and therefore the site does not require any Defense Access Roads funding. Also this site is within walking distance of the Van Dorn Metrorail station (although we understand that the adjacency to a Metrorail site has been eliminated as a requirement). The Van Dorn Street interchange with I-95 is nearby. Eisenhower

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Avenue is served by three exits from I-95 (Telegraph, Clermont and Van Dorn), there is a new exit being constructed (Mill Road), and major improvements are underway at one exit (Telegraph). Vehicles can also access the site from Van Dorn by using the I-395 Duke Street or Edsall Road exits to reach Van Dorn.

While the Victory Center site does not have VRE access, VRE currently runs on tracks near the Victory Center site. If this site is selected for WHS, the City would study the feasibility of locating a VRE platform behind the Victory Center site (Manassas line) or adjacent to the Van Dorn Metrorail station (Fredericksburg line).

In addition to these transportation improvements related to the Victory Center site, the City has recently adopted a long-range Master Transportation Plan that contemplates Bus Rapid Transit (BRT) service on Van Dorn Street and Eisenhower Avenue. Recent agreements in regard to the HOT lanes on I-395 include the funding of a significant increase in transit service in the Van Dorn corridor in both Fairfax County and Alexandria.

The Victory Center would also have a Transportation Management Plan (TMP) in place that could accommodate the targeted 40% trip reduction level, with the adjacent Metrorail access being a major component of trip reduction.

In the case of the **Mark Center**, traffic studies undertaken when the City approved the Mark Center office density carefully determined what roadway improvements would be necessary. This includes the widening of Seminary Road and the expansion of the turning capacity from Seminary Road into the Mark Center site. With these improvements, which are to be made at developer's expense, City staff is comfortable that sufficient capacity will be created by the proposed and developer-agreed-to improvements and that no additional transportation studies are warranted. Since Duke Realty is funding these road improvements, this site does not require any Defense Access Roads funding.

The Mark Center can accommodate the desired 40% level of trip reduction by using existing TMP measures, and by expanding those measures. The Mark Center land use approvals previously granted by the City require substantial TMP measures which would be required to be expanded if WHS locates to the Mark Center site. The TMP measures include shuttle service, the City-operated DASH bus system, Metrobus, and the proposed governmental shuttle service.

The City's recently adopted long-range Master Transportation Plan includes a Bus Rapid Transit (BRT) corridor on Beauregard Street, which is a short walk from the proposed WHS site.

Air Quality: The EA adequately addresses air quality and its conclusion of *de minimis* air quality impacts at both sites in Alexandria. This is the logical conclusion since this is a relocation project from adjacent Arlington County.

Construction emissions at the two Alexandria sites will be minimal as there are no demolitions of existing buildings required.

Water and Biological Resources: Both Alexandria sites have the required land use and storm water approvals, and the developers plan on ensuring that storm water management reflects best practices. As a result, any concerns about major adverse runoff volumes and velocities are unfounded. In the case of the Victory Center site, the existing old development includes a nearly impervious surface for the entire site. Anything on that site would be better than a No Action alternative. The new development at the Victory Center will reduce the impervious coverage and improve substantially the handling of storm water runoff. This would improve the conditions on the adjacent Resource Protection Area (RPA). The Mark Center, whose master plan with a large, dedicated nature preserve makes it one of the pioneers in ecologically sensitive development, has the necessary storm water management and water quality control measures in place. With the major 44-acre nature preserve proffered by the Mark Winkler Company, the City accepted the replacement of one of the wooded areas with future office development.

Socioeconomics: The EA is silent on the impact on affordable housing of the Mark Winkler and the Victory Center sites. The creation of 6,409 jobs at either of these two housing sites would tend to increase rental and ownership housing demand to some degree, and therefore reduce the supply of affordable housing to some extent. The WHS would be a positive economic addition to the City, as it will help mitigate much of the effect of the loss of some 7,200 Department of Defense jobs that have been, or will be, transferred out of the City as part of the BRAC process.

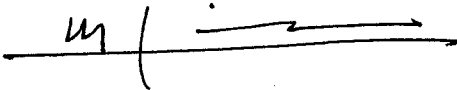
Utilities: The City of Alexandria concurs in the conclusion that the Victory Center and the Mark Winkler sites both have water, electric, natural gas, sanitary sewer access and capacity which will be able to more than adequately meet the needs of the proposed WHS facility.

Public Safety: Because of significant additional planned development and redevelopment in the West End of Alexandria, the City plans at some time in the future to construct and equip a new fire station to serve the West End of the City, where both the Victory Center and the Mark Center sites are located. The City has reserved a parcel of land on Eisenhower Avenue for this purpose.

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In conclusion, the City believes that overall the EA report and conclusions are sound and the Finding of No Significant Impact in regard to the Mark Center and the Victory Center WHS proposals is correct. If the City can be of any assistance in further clarification of our comments on the EA, please contact us.

Sincerely,

A handwritten signature in black ink, appearing to be 'M Jinks', written over a horizontal line. The signature is stylized and includes a flourish at the end.

Mark Jinks
Deputy City Manager

cc: The Honorable Mayor and Members of City Council
Jim Hartmann, City Manager
Faroll Hamer, Director, Planning & Zoning
Tom Culpepper, Deputy Director, Transportation & Environmental Services
Stephanie Landrum, Senior Vice President,
Alexandria Economic Development Partnership