

BRAC Ft. Belvoir / Engineering Proving Ground
Draft EIS Testimony
April 17, 2007 Public Hearing

There is much to commend in the Draft EIS. It is *much* better than the Draft Siting Analysis released last June. However, I feel like I'm shadow-boxing. For every presentation of the stark reality of transportation needs and of what must be accomplished in an impossibly short time frame found one place in the EIS, elsewhere, there is a counter expression. Such overly optimistic counter expressions might be applicable to BRAC relocations elsewhere, but such rationales are simply not a sound basis for decision-making in the 3rd most congested region in the nation, in a state whose transportation is arguably the most underfunded, and in a robust economy of full employment with one of the highest percentages of two-income households in the nation.

Regional Impact – I urge the assertion be ignored that states there will be no additional regional work trips. That analysis on pgs 4-36 thru 4-37 likens the affect to reshaping a bean bag, stating that, as Army jobs are moved out of leased space in Crystal City, Reston, Bethesda, and so on, those offices will be filled by other workers currently working elsewhere *in this region*. Such an assertion simply does not comport with this region's office vacancy factor. Empty space is filled by a domino effect that does not leave empty space elsewhere. Building 6.2 million square feet of new office space will mean a *commensurate net regional increase* in jobs and therefore in work trips.

Such a net increase in jobs also will swell the region's housing sprawl more than has been assumed. In this robust economy, jobs drive growth. According to a recent George Mason University study, one of the reasons historically that this region has not adequately planned for its transportation needs is that, while job growth has been correctly projected, the number of households that will be created has always been underestimated. “[The] Current Round 6.4A Forecast assumes 2.212 jobs/household... [the] Proposed Round 7 Forecast assumes 1.801 jobs/household...Reality is 1.6 jobs/household.”(Washington Airports Task Force 07/06) The increased residential sprawl produced by creating a net increase in workspace for 22,000 jobs – 6.1 percent of the total employment in all of Fairfax County (pg 4-77) – will be substantial.

The conclusion that the regional traffic impact will not be significant also assumes that, by September 2011, 50 percent of the personnel whose jobs will be re-located will shorten their commute by moving closer to EPG/Ft. Belvoir. Unless this assumption has been tested in a region with a comparably high proportion of two-income households, such an assumed re-location is overly optimistic. In fact, almost buried back on pg 4-338

is this very point “An employee’s decision to move could depend on factors such as the location of a spouse’s place of employment, changing a child’s school district, proximity to family and friends, or cost of housing.”

Finally, the DEIS assumes that projects on VDOT’s 6-Year Plan and on Fairfax County’s CIP will be completed “within their respective time frames.”(pg 4-62) First, I hope it is understood that being on the 6-Year Plan does not necessarily mean that a project will be completed within 6 years; it only means that some work will be taking place on that project within the next 6 years. With that clarification, a more critical issue is that the DEIS includes these projects in the baseline for determining the impact of adding 22,000 jobs. This is not appropriate. Projects currently on Virginia’s 6-Year plan and Fairfax’s CIP are being undertaken to add desperately needed regional capacity to alleviate traffic congestion, not to accommodate this massive BRAC relocation, which was not anticipated. Statements in the DEIS such as “hours of congestion along the I-95 corridor are not expected to increase substantially... because the growth in demand would be less than 5 percent”(pg 4-80) should be stricken. 5% more vehicles in a supersaturated solution is total gridlock.

Local Impact – What’s puzzling is that just three pages beyond the declaration that a 5% increase in demand is not increase substantial, the DEIS declares “[i]n the areas immediately surrounding EPG, severe congestion lasting 3 to 4 hours would occur if mitigating actions, including transportation improvements, are not taken.” This statement is the welcomed tough analysis I applaud.

The DEIS then goes on to make a very strong case for – and *hopefully* a commitment to fund under the Defense Access Road Program (pg 4-137) – 14 essential transportation projects (including expanded bus service) costing \$458 million for the Preferred Alternative. I especially want to thank you for following through on my concerns about the critical need for a grade-separated intersection on the Franconia Springfield Parkway near Neuman. It is crucial that the detailed traffic analysis, which justifies all 14 expenditures as a cost of BRAC, not be over-ridden by sweeping summary statements elsewhere in the DEIS.

Indeed, the DEIS is to be commended for recognizing that “state and local agencies require, for development they control, that the developer mitigate those effects with some improvement to the transportation system.”(pg 4-137) Such routine, large developer outlays are over and above significant local and state fees and annual taxes that the military will not be paying. In this context, it is, indeed, appropriate that the 14 mitigating transportation improvements be funded by the Army. State and local transportation funding will have to cover a myriad of other improvements necessitated by the BRAC re-location, such as dealing with significant problems that will be exacerbated on Rolling Road and Backlick Road.

Timing – These transportation projects are critical to mitigate “reduced employee productivity, higher commuting costs, and degradation of quality of life...not limited to personnel...[but also] Through commuters and the local community.”(Pg 4-84) These projects are so critical that the relocation of employees to EPG/Fort Belvoir must not proceed until all of the direct bolt-on transportation projects are complete and the transit connections are operative.

If the funding were guaranteed, it is possible that the engineering and design work, right-of-way acquisition, and road construction could be completed in four years. However, it is probable that required Environmental analyses and TPB air quality review will push completion of these transportation projects beyond September 2011. This is especially likely if getting TPB approval depends on the highly debatable assertion in the DEIS that “implementing the Preferred Alternative and the realignment of Fort Belvoir would decrease both the number of vehicles and the total VMT within the region.”(pg 4-155) If this assertion is to be sustained in the air quality review, transit should be revisited, not only for VRE service from the south but also for personnel to be re-located who currently live in Districts A, B, G, H, and I, large portions of which are well-served by transit.

In addition to requirements that may prevent essential transportation projects from being completed by September 2011, the DEIS notes a number of other reviews and approvals that must occur before site development and building construction can begin. These issues involve Chesapeake Bay protection areas, wetland preservation, petroleum storage, solid waste management, asbestos, and hazardous materials.

In view of these required procedures and the necessity to get Congressional funding for congestion mitigation projects, I would request that the Final EIS contain a timetable with specific actions that must be completed by dates certain or trigger a September 2011 occupancy being moved back accordingly. For example, the DEIS states “The peak year of [construction and renovation] expenditures would be 2008” and Table 4.10-9 lays out subsequent expenditures year by year. The construction projects used to generate this table should be listed on a critical path to actuate decision(s) to extend existing leases so that the movement of personnel to EPG and Fort Belvoir will be delayed until building construction and, most importantly, all of the bolt-on congestion mitigation steps are in place.

Acknowledgments – I cannot conclude without commending the steady hand and receptive demeanor of Colonel Lauritzen and likewise commending the desire to explore all options and establish sound factual information displayed by Assistant Secretary of the Army Keith Eastin. They have made this very challenging undertaking as respectful and rational as possible.