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May 5, 2017

Ms. Alexis Gray, NEPA Compliance Specialist
Office of Planning and Design Quality
U.S. General Services Administration, National Capital Region
301 7th Street SW Suite 4004
Washington, DC 20407
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RE: NFATC Final EA Comments

Dear Ms. Gray:

Thank you for the opportunity to comment on the Final Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) for the George P. Shultz National Foreign Affairs Training Center (NFATC) 2017 Master Plan Update. Arlington County is proud to serve as the home for the NFATC and we look forward to working with you in support of the NFATC's evolving mission and growth needs.

We have appreciated the consultation we have had with the General Services Administration (GSA) and the Department of State (State) on this project to date and we look forward to continuing to work closely with you. We firmly believe that by working together we can resolve the issues and concerns identified in the attached comments while also taking advantage of unique opportunities to meet the needs of all parties.

As we have discussed, the areas of traffic, parking and pedestrian/bicycle connectivity in the area of the NFATC campus are high priorities for Arlington County. We appreciate that the EA expresses the commitment of GSA and State to "be a good neighbor and will continue to explore opportunities for alternative trail routes and public access points with Arlington County." We understand fully that continued public access through the campus is incompatible with current operations and security standards and we appreciate your commitment to working with us to address the challenges posed by having a 72 acre secured federal campus in the heart of a residential setting. We look forward to addressing these issues in an update to the 2008 Memorandum of Understanding between State and Arlington County and as the individual projects analyzed in this EA move forward.

Thank you again for the opportunity to comment on the Final EA. If you have any follow-up questions, please contact Brian Stout in my office at bstout@arlingtonva.us or 703-228-0577.

Sincerely,

A handwritten signature in black ink that reads "Mark Schwartz".

Mark Schwartz
County Manager

CC: Senator Mark Warner, United States Senate
Senator Tim Kaine, United States Senate
Representative Don Beyer, United States House of Representatives

Arlington County Comments
Final EA and FONSI for the NFATC 2017 Master Plan Update

3.2 Land Use and Zoning**3.2.2 Significance of Effects**

- “Neither the No-Action nor the Proposed Action would change existing land use or zoning.” Arlington County requests opportunities to review plans for any and all future buildings as they are developed.

3.4 Parks and Recreation

- Arlington County looks forward to continuing our partnership for joint use of Arlington Hall Park with the Department of State as described in the existing MOU. The park and its amenities provide important open space and recreational facilities in this area of the County.

3.5 NFATC Jogging/Bike Trail, Pedestrian Tunnel, and Neighborhood Connectivity**3.5.2 Significance of Effects**

- Despite the technical definitions of “no significant impact” of removing the trail, as understood within the context of NEPA, the impact to the community is nonetheless real. (The alternative routing option for the current trail connecting points 1 and 2 as shown in Figure 14 and quantified in Table 6 is more than twice as long, traverses steeper grades and requires walking along the street edge.) This alternative is not functionally equivalent to the trail being eliminated.
- Further, the value of any individual trail segment is directly related to its connections to the larger non-motorized mobility network, and its location relative to destinations along those networks. (This existing trail’s limited connectivity is one reason why it fails NEPA’s “intensity” test.) Therefore, staff requests that GSA and DOS also commit to working with the County to develop facilities for pedestrians and bicyclists that would connect the isolated blocks in the Alcova Heights neighborhood between 1st Street South and 5th Street South to the rest of the neighborhood. Such a connection would not only provide much needed connectivity between different parts of the neighborhood, it would also create entirely new and useful low-stress links to and between destinations outside NFATC. Such destinations include: Barcroft Elementary School to the west; the Town Center district of Columbia Pike to the south; the new, approved neighborhood elementary school at the Thomas Jefferson site to the east; and neighborhoods north of Arlington Boulevard, reachable via the Jackson Street pedestrian bridge. Therefore, the requested GSA/DOS commitments are critical to improving Arlington’s bicycle and pedestrian networks.
- Arlington appreciates the proposed improvements that would connect both sides of George Mason Drive through the pedestrian tunnel outside of the NFATC’s security perimeter. Providing permanent access to this underpass helps provide safe connections to community resources. Arlington will appreciate GSA/DOS’s assistance in any future improvements to the underpass, such as upgrades to make it bicycle-accessible or ADA compliant.

3.9 Historic Resources

- For confirmation, Arlington County Historic Preservation Program staff will provide comments on the Section 106 process separately.

3.10 Traffic Volumes and Levels of Service, 3.10.2 Significance of Effects**3.11 Parking, 3.11.2 Significance of Effects****3.12 Alternative Modes of Transportation, 3.12.2 Significance of Effects**

- In these subject areas (Traffic Volumes and Levels of Service, Parking, Alternative Modes of Transportation) it was not clear what standard or metric is being used to determine significance of effects. Overall, it is difficult for Arlington staff to discern what impacts were found to be significant for these subject areas, what standards they were measured against, and whether those impacts merit mitigation.

3.11 Parking

- Consistent with Staff comments on the TMP, the relationship between the parking ratio goal and the proposed mitigation action is unclear. The DEIS says "To meet NCPC's ultimate parking ratio goal of 1:4, FSI will further emphasize and encourage alternative means of transportation to the NFATC campus. Strategies presented in the updated NFATC TMP provide numerous options to reduce the use of single-occupant vehicles and increase the use of alternative transportation modes." However, this mitigation approach, which appears in the Draft EA and carries over into the Final EA, is both vague and flawed, given that it is about mode choice, not parking supply. Parking supply is a form of transportation demand management. The EA is evaluating the entire Master Plan Update, which would include its ability to meet stated goals and objectives through the mechanisms described in the Plan. If the plan parking ratio goal is 1:4, this can be done by systematically and strategically removing on-site parking. This mitigation could occur as a part of the proposed project, converting parking areas to other uses in a phased process that also increases shuttle service, ride-matching, pricing incentives, or other methods to support the transition. Staff finds this a weakness of the EIS because it does not accurately portray and evaluate the mitigation options for this issue.

3.12 Alternative Modes of Transportation

- Staff continues to have concern about the coordination of the enhanced security procedures with access to, from, and around the site. These procedures are described as helping dissuade people from off-site parking in the neighborhoods and easing the process of vehicles entering the site due to pre-approved security credentials, but those same security procedures may also reduce walking and biking and even taking public buses to this site. The EA does not adequately describe the impacts of those security procedures on walking, biking, or taking public transit to this work/school location. Without a clear description of the negative impacts, there is also no clear description of mitigation options to reduce those impacts.
- The EA emphasizes the huge role of the shuttles in getting students to the site, however, it minimizes the "Department of State's faculty and staff shuttle prohibition for the purposes of commuting to work," a prohibition which conflicts with the opportunity presented by existing DOS resources to reduce the vehicle trip generation impacts of this site (which relate to the parking impacts, air quality impacts, etc.). In the existing condition, faculty and staff make up 44 percent of the on-campus population. In the proposed future condition, although there is no increase in faculty/staff numbers under the proposed project, this group will still comprise 37 percent of the campus population. The EA says the TMP will be reviewed every two years to confirm if the shuttle policy changes, however, there is no analysis provided to indicate what conditions might result if that policy were changed today as a mitigation action. How many vehicle trips might be diverted to shuttle and be removed from the road network?

A change to the shuttle policy seems to be a mitigation action that should be transparently listed and considered as to its potential benefits.

- Arlington County Commuter Services has worked with State in the past on creating transportation benefits and amenities to encourage alternatives to single occupancy vehicle trips for NFATC staff and students and we look forward to continuing to work with you to identify additional steps that can be taken.

3.13 Cumulative Effects

- Page 49 of the Final EA, paragraph 3 under 3.10.1, says "Currently, there are no traffic volume problems on the existing internal road network" of the campus. However, The Traffic Study on page 4 section 3.2 existing (2014) conditions operational analysis says that Individual westbound turning movements from the South Gate operate at LOS F. The 2017 Future Year analysis on page 18 of the Traffic Study states explicitly that the westbound queue length here, build or no-build, is unacceptable. The statement of no existing problems does not appear consistent with the analysis provided, nor with the cumulative impacts discussion.
- In the context of cumulative effects, a warrant analysis was conducted for a signal and a southbound left turn, and it was found to be warranted in order to improve the unacceptable queuing condition that is on the campus property and related to campus traffic. The modeling of the entire intersection with the signalized condition show the northbound movements dropping from LOS A to LOS C in the AM and PM peak. George Mason Drive northbound is expected to carry roughly a thousand vehicles in each peak hour, many more than would use the east and westbound movements at this intersection. As a mitigation of this particular cumulative impact, the signalization of this intersection for the specific benefit of the South Gate westbound movements seems less sensible (and probably less cost effective) than a programmatic mitigation to shift commute hour drivers to the DOS shuttle or other non-auto modes. Those mitigation options are not offered or analyzed.
- In response to Arlington's comment from January 13, 2017 labelled EA Volume 3 pages 32 and 33 expressing concern about the County paying for this improvement, the Final EA refers to a 1958 Easement agreement to say that maintenance and improvements to the roadway (George Mason Drive) are the responsibility of Arlington County. Since the unacceptable queuing condition is interior to the campus property, it is not clear that this impact is Arlington's to fix. Arlington would typically require a development projects to pay for mitigations that must occur in the public right of way to meet the transportation needs of that development project.
- Staff did not see a response to Arlington County Comment EA Volume 3 page 32 about the problems with suggested removal of on street parking for the left turn lane.
- Cumulative impacts described on page 61 of the Final EA related to permanent increase in impervious surface (related to vegetation, hydrology, sustainability) could be mitigated at the same time that traffic and parking impacts are mitigated if the new buildings had been proposed to occupy space in existing parking lots.