



Davison Army Airfield Area Development Plan Draft Environmental Impact Statement (EIS)



Comment Form



As Friends of Accotink Creek, our concerns with the DAAF Proposed Action are threefold: The impact on sedimentary load on the Accotink brought on by increased impervious surface and planned loss of riparian habitat; the loss of carbon sequestration that will result from destroying plant life and leaf count, on DAAF property; and the increase of pollution from winter storm treatment of DAAF's buildings runways, streets and sidewalks described in Projects 5-15 and 18-24.

We are fully cognizant that, as pointed out in the Draft EIS, the vast majority of impervious surfaces that impair the Accotink are upstream of DAAF, but please note that our local jurisdictions are currently spending tens and hundreds of millions to correct that unfortunate fact by mitigating decades of paving with limited or nonexistent stormwater controls. As the DAAF Proposed Action proceeds, the DAAF, bordering about 2.3 miles of the Accotink, has an opportunity to set a high standard for environmental stewardship in our shared watershed as it contracts for projects that will retrofit and expand facilities. We note with pleasure the citation in the Draft EIS of the Army's EO 11990, Protection of Wetlands, that "... requires that federal agencies provide leadership and take actions to minimize or avoid the destruction, loss, or degradation of wetlands and to preserve and enhance the natural and beneficial values of wetlands." Along the lines of that ambitious policy, we ask that the Army go above and beyond the minimum effort to meet its environmental obligations as dutifully addressed in the Draft EIS, and to not limit its application to the formally defined wetlands of DAAF, by realizing that the entire DAAF, apparently the only industrial area in the bottomlands of the lower Accotink, has little to no buffer space in which to mitigate damaging runoff.

As the Army proceeds with the DAAF Proposed Action, the Friends of Accotink Creek will encourage all interested parties to join us in supporting positive initiatives, and we look forward to observing and participating as an advocate for the Accotink Creek watershed.

The Draft EIS notes among the monitoring benchmarks for the Accotink, the 2017 DEQ TMDL report, which resulted from the creek's impaired state. Volume II focuses on the sedimentation issue and Volume III focuses on the chloride pollution, a seasonally varying problem due to winter storm treatments on impervious surfaces. We are quite familiar with the Accotink TMDL and ensuing follow-on activities, and will refer to them in the comments that follow.

Regarding sedimentation impacts on the Accotink, we ask the Army to be more forthright and specific about BMPs that contractors will be required to use in projects of the Proposed Action. As described in Table ES-2: Summary of Impacts from the Proposed Action, full implementation will have these effects on "Water Resources: Disturb 3.6 acres of the officially designated wetlands and 2026 feet of the streams in DAAF; eliminate 23 acres of RPAs; and develop 7.5 acres of the officially designated flood plain. As noted, the "... Full Alternative would contribute significant adverse cumulative effects on wetlands and streams. ... " In response, the Army simply proposes in Section 6.2.1 that mitigation will be limited to three 'compensatory' alternatives: The restoration of wetlands and streams elsewhere on Fort Belvoir or the surrounding area; the payment of in-lieu fees to an approved restoration program; or the purchase of credits from an approved mitigation bank.

Noting that Fort Belvoir's 52 other projects cited in Table 5.4-1 include many increases in impervious surfaces that will affect other watersheds, our impression is that the first compensatory alternative listed is a dead end.

Rather than looking outside DAAF property for compensatory mitigation, we ask that the Army take advantage of this rare opportunity to make up for past construction in DAAF since the 1950's, doubtlessly

with inadequate stormwater controls, by finding imaginative ways to provide the best of stormwater controls above and beyond the legally required minimums. For example, the BMPs for storm water management cited in the Accotink TMDL Volume II have corresponding efficiency measures from actual projects. Examples may include installing nearby green roofs, pervious parking lots, infiltration cisterns, rain gardens.

In addition, where mitigation of the impact on the Accotink within Fort Belvoir is not available, we ask the Army to cooperate with Fairfax County to find fundable shovel-ready projects that will improve Accotink Creek's health upstream of DAAF, rather than deferring to unrelated projects that theoretically will improve other streams.

In some areas of the Draft EIS, wording is vague as to whether or not native species will be used for replanting disturbed areas of the Accotink watershed. We ask that the policy for the Proposed Action be clear that the Army requires that there will be no tolerance for invasive species in seed mix or plantings during and after construction, and that plantings will be with species native to this region of Virginia, allowing regrowth in harmony with surrounding habitats and native wildlife that will also help minimize upkeep and mowing expense.

Regarding impact on carbon sequestration resulting from removing vegetation for the Proposed Action, we note the replacement policy described in Section 6.2.2.2 Biological Resources. However, we request that the Army employ the principle that leaf area is a better measure for the net carbon dioxide removal than just tree cover. Leaf area is also a better measure for water uptake and cooling effects in the immediate environment, and it allows the Army the flexibility of going with green walls and roofs which may be more palatable than efforts to replant the surface with multiple canopies in order to offset the increased impervious surface.

Finally, regarding chlorides, we request that DAAF leadership consider and even surpass the recommendations that will result from the Accotink TMDL Volume III, Chlorides, in order to minimize impairment despite the increased area of paved surfaces that will need treatment in winter storms. The BMPs that have been worked out with public, private, and advocacy representatives in the Salt Management Strategies Stakeholder Advisory Committee (SAMS SAC) will be published within a few months, and they will include proven, cost-effective methods to monitor and reduce use of salt and other chlorides for winter storm treatment, without detriment to the safety of the users of paved surfaces. We believe DAAF can be a leader for reducing chloride pollution, surpassing Fort Belvoir's obligations under its MS4, VAR040093. We also recommend benchmarking VDOT and local jurisdictions for cost-effective BMPs for salt management through monitoring and minimization based on conditions.



Fig. 1. Accotink Sediment from Route 1 Widening



Fig. 2. Accotink erosion near Anderson Park

Our comments are informed by our experience monitoring and responding to various public projects that directly impacted the Accotink's health. For instance, during VDOT's 495/HOT expansion, where the Friends of Accotink Creek documented and reported hundreds of construction-related sediment pollution events, including incidents where heavily sediment-contaminated water was being pumped directly into Accotink Creek and her tributaries. The Virginia Department of Conservation and Recreation issued a stop-work order, and the Friends of Accotink Creek partnered with the Potomac Riverkeeper on a lawsuit under the Clean Water Act, which was preempted by state action, resulting in a Consent Decree (Documentation is at <http://www.accotink.org/HOT.html>).

Closer to DAAF, we noted in 2017 the excessive sedimentary runoff into Accotink Creek from the Route 1 widening just downstream from DAAF, as recorded in Figure 1, contrary to VDOT's obligations to limit water resource impact. We look forward to the Army's success in preventing such runoff during the DAAF modernization. Similarly, we have noted the extreme erosion of the Accotink banks Near Fort Belvoir's Anderson Park (to be partially paved over by Project 6), as recorded in Figure 2), and we hope the DAAF modernization will actually reduce such erosion with aggressive application of BMPs for storm water management.

Sincerely yours,

Friends of Accotink Creek : : www.accotink.org :

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