

Appendix A

Agency Coordination

**CORRESPONDENCE WITH
VIRGINIA COUNCIL ON INDIANS**

Silbert, Shari A. (WFF-200.C)[EGG, Inc. (WICC)]

From: Beacham, Deanna (GOV) [Deanna.Beacham@governor.virginia.gov]
Sent: Monday, April 18, 2011 3:46 PM
To: Stanley, Randall M. (WFF-2280)
Cc: Silbert, Shari A. (WFF-200.C)[EG&G, Inc. (WICC)]; Lee, Amanda (DHR); Kirchen, Roger (DHR)
Subject: RE: DEA for Reconfiguration of the Wallops Flight Facility Main Entrance

Greetings Mr. Stanley,

Thank you for sharing the Draft Environmental Assessment and inviting comment from the Virginia Council on Indians. After reviewing the document and discussing it with the Department of Historic Resources, we have no comments to make.

We wish you success in your project.

Regards,

Deanna Beacham
Virginia Council on Indians
Office of the Governor
P. O. Box 1475
Richmond, VA 23218
804.225.2084
deanna@governor.virginia.gov
<http://indians.vipnet.org>

From: Stanley, Randall M. (WFF-2280) [<mailto:randall.m.stanley@nasa.gov>]
Sent: Tuesday, March 29, 2011 3:37 PM
To: Beacham, Deanna (GOV)
Cc: Silbert, Shari A. (WFF-200.C)[EG&G, Inc. (WICC)]
Subject: DEA for Reconfiguration of the Wallops Flight Facility Main Entrance

Dear Ms. Beacham,

Please find attached a letter concerning the Draft Environmental Assessment (DEA) for the Reconfiguration of the Wallops Flight Facility Main Entrance that is now available for public review and comment. We would be happy to send you a CD or hardcopy of this DEA if you would like. If you have any questions or comments pertaining to this DEA, please do not hesitate to call Shari Silbert at 757-824-2327, or myself at the phone number listed below.

Thank-you,

Randy Stanley

Randall M. Stanley
NASA / WFF FMB, Code 228
Building N-161, Room 127
Wallops Island, VA 23337

Direct: 757-824-1309
Fax: 757-824-1831

National Aeronautics and
Space Administration
Goddard Space Flight Center
Wallops Flight Facility
Wallops Island, VA 23337



Reply to Attn of: 228

March 29, 2011

Ms. Deanna Beacham
Virginia Council on Indians
Office of the Governor
P. O. Box 1475
Richmond, VA 23218

Subject: Native Consultation and Environmental Assessment for the Reconfiguration of the Wallops Flight Facility Main Entrance at NASA Wallops Flight Facility, Wallops Island, VA

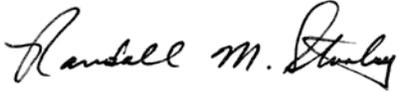
In accordance with the National Environmental Policy Act of 1969 (NEPA), as amended, the National Aeronautics and Space Administration (NASA) has prepared a Draft Environmental Assessment (DEA) for the proposed Reconfiguration of the Wallops Flight Facility Main Entrance at Wallops Flight Facility (WFF), Wallops Island, VA. The subject DEA is available for your review at the following website: http://wff.nasa.gov/code250/MERP_DEA.html.

The current main entrance into WFF consists of a single inbound traffic lane and a single outbound traffic lane, a guard house (Building N-126), a vehicle inspection lane, a badge office (Building N-127), two truck inspection lanes, and employee and badge office parking lots. The guard house is 41 square meters (m²) (446 square feet [ft²]) and the badge office is 247 m² (2,662 ft²). The badge office parking lot has 16 regular spaces and 2 handicapped spaces and the security personnel parking lot has 14 spaces and no handicapped spaces. The entire main entrance footprint encompasses 0.6 hectares (1.5 acres).

The purpose of the Proposed Action is to separate vehicles, trucks, and people to increase personnel safety and decrease congestion at the main entrance to WFF. The project is planned using three distinct alternatives: the No Action Alternative and two Action Alternatives (Preferred Alternative and Alternative One). The main difference between the Preferred Alternative and Alternative One is the proposed location of the new badge office. The Preferred Alternative proposes the badge office be located in a currently forested area just south of its current location on Atlantic Road while Alternative One proposes that the badge office be built in an open field further south on Atlantic Road across from residential homes. More specific details about this project and the alternatives can be found in the DEA.

If you have any questions or require any additional information concerning this project, please contact Ms. Shari Silbert at (757) 824-2327 or me at (757) 824-1309. Thank you for your consideration of these documents.

Sincerely,

A handwritten signature in black ink that reads "Randall M. Stanley". The signature is written in a cursive style with a large, stylized initial 'R'.

Randall M. Stanley
Facility Historic Preservation Officer

cc:

200/Ms. C. Massey

228/Mr. G. Lilly

250/Ms. C. Turner

VDHR/Ms. A. Lee

CORRESPONDENCE WITH
VIRGINIA DEPARTMENT OF HISTORIC RESOURCES

RECEIVED

MAR 31 2011

Department of
Historic Resources

Project Review Application Form

This application must be completed for all projects that will be federally funded, licensed, or permitted, or that are subject to state review. Please allow 30 days from receipt for the review of a project. All information must be completed before review of a project can begin and incomplete forms will be returned for completion.

I. GENERAL PROJECT INFORMATION

1. Has this project been previously reviewed by DHR? YES ___ NO DHR File # 2011-0445

2. Project Name Reconfiguration of the Wallops Flight Facility Main Entrance

3. Project Location Wallops Island Accomack
City Town County

4. Specify Federal and State agencies involved in project (providing funding, assistance, license or permit). Refer to the list of agencies and abbreviations in the instructions.

Lead Federal Agency NASA

Other Federal Agency N/A

State Agency N/A

5. Lead Agency Contact Information

Contact Person Randall M. Stanley, NASA WFF Historic Preservation Officer

Mailing Address Building N-161, Room 127, Wallops Island, VA 23337

Phone Number (757) 824-1309 Fax Number (757) 824-1831

Email Address Randall.M.Stanley@nasa.gov

6. Applicant Contact Information

Contact Person Shari A. Silbert

Mailing Address Building F-160, Room C-165, Wallops Island, VA 23337

Phone Number (757) 824-2327 Fax Number (757) 824-1819

Email Address Shari.A.Silbert@nasa.gov

II. PROJECT LOCATION AND DESCRIPTION

7. USGS Quadrangle Name Wallops Island, VA

No Action Alternative – 0 acres

Preferred Alternative – 3.5 acres

8. Number of acres included in the project Alternative One – 4 acres

9. Have any architectural or archaeological surveys of the area been conducted?

YES X
NO ___

If yes, list author, title, and date of report here. Indicate if a copy is on file at DHR.

URS/EG&G, *Cultural Resources Assessment of NASA Wallops Flight Facility, Accomack County, Virginia*, 2003.

URS/EG&G, *Historic Resources Survey and Eligibility Report for Wallops Flight Facility, Accomack County, Virginia*, 2004.

URS, *Integrated Cultural Resources Management Plan (ICRMP), Wallops Island Flight Facility, Accomack County, Virginia*, 2006.

Construction of Navy Housing, Chesapeake Division of the Naval Facilities Engineering Command, 1990 (unknown if copy exists in VDHR files).

10. Are any structures 50 years old or older within or adjacent to the project area?

YES ___
NO X

If yes, give date(s) of construction and provide photographs.

11. Does the project involve the rehabilitation, alteration, removal, or demolition of any structure, building, designed site (e.g. park, cemetery), or district that is 50 years or older? If yes, this must be explained fully in the project description.

YES ___
NO X

12. Does the project involve any ground disturbance (e.g. excavating for footings, installing sewer or water lines or utilities, grading roads, etc.)? If yes, this must be explained fully in the project description.

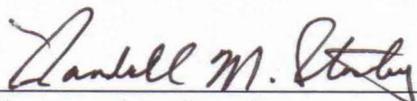
YES X
NO ___

Yes, refer to accompanying cover letter, associated consultation material, and Draft Environmental Assessment for the NASA Wallops Flight Facility Main Entrance Reconfiguration for a complete description of this proposed project.

13. **DESCRIPTION: Attach a complete description of the project. Refer to the instructions for the required information.**

Refer to accompanying cover letter, associated consultation material, and Draft Environmental Assessment for the NASA Wallops Flight Facility Main Entrance Reconfiguration for a complete description of this proposed project.

To the best of my knowledge, I have accurately described the proposed project and its likely impacts.



Signature of Applicant/Agent

3-28-11

Date

MAIL COMPLETED FORM AND ATTACHMENTS TO:

Virginia Department of Historic Resources

Attention: Project Review

2801 Kensington Avenue, Richmond, VA 23221

www.dhr.virginia.gov

The following information must be attached to this form:

- Completed DHR Archives search
- USGS map with APE shown
- Complete project description
- Any required photographs and plans

No historic properties affected No adverse effect

Additional information is needed in order to complete our review.

We have previously reviewed this project. A copy of our correspondence is attached.

Comments: Based upon a review of the information provided, DHR
concludes no historic properties affected by the proposed
reconfiguration of the Halleps Flight Facility Main Entrance
project, Accomack County.

Signature M. Amanda Lee

Date 18 April 2011

Phone number 804-367-2323 x122

DHR File # 2011-0445

This Space For Department Of Historic Resources Use Only

MAIL COMPLETED FORM AND ATTACHMENTS TO:

Virginia Department of Historic Resources

Attention: Project Review

2801 Kensington Avenue, Richmond, VA 23221

www.dhr.virginia.gov

CORRESPONDENCE WITH
VIRGINIA DEPARTMENT OF TRANSPORTATION

Speidel, Valerie A. (WFF-200.C)[EGG, Inc. (WICC)]

From: Weidenhammer, Bradley A., PE [Bradley.Weidenhammer@VDOT.Virginia.gov]
Sent: Wednesday, August 25, 2010 12:57 PM
To: Bull, Paul C. (WFF-2280)
Cc: Stewart Hall
Subject: RE: Wallops Main Gate

Paul,

Thank you for showing me around the gate area yesterday to get a better feel for the operations and traffic flow.

I have had a chance to look at the renderings for the various build-out scenarios and offer the following comments:

- The Phase 1 Build-Out, which includes the relocation of the Badge Office onto Atlantic Road, will redistribute existing traffic. Because there is no new traffic generation associated with the proposal, a full Traffic Impact Analysis is not required by VDOT.
- An evaluation of turn lane needs (right-turn lane and left-turn lane) on Atlantic Road will be required at the proposed entrance to the Visitors Parking. The need for turn lanes will be dependent on peak hour traffic volumes projected for the site, as well as traffic distribution percentages. Then entrance design will need to be in accordance with the VDOT *Road Design Manual* – Appendix F.
- The entrance location on Atlantic Road appears to meet required spacing standards and sight distances.
- Based on observations at the site, the relocation of the Badge Office will reduce some of the traffic conflicts during the AM peak, where queues were observed for vehicles entering the facility conflict with visitors exiting the Badge Office destined for other facilities. It does not appear that relocation of the Badge Office alone will eliminate queues entering the facility.
- A comprehensive signing plan should be developed to direct traffic to the appropriate destinations from the various entry points to the gate area.
- For the final build-out plans, a roundabout alternative should be evaluated at the intersection of Atlantic Road and Mill Dam Road as a means to reduce the number of conflict points in the intersection. The design should consider a bypass lane from Atlantic Road that can provide the two lanes into the Guard Booth (one from Mill Dam through the roundabout, the other from the right turn bypass lane). The roundabout can be designed such that it can accommodate large vehicles. It would also appear to be compatible with the County plans for the Wallops Research Park and reduce the need for a traffic signal at this intersection.
- The proposed relocated Guard Booth should be shifted as far from the Atlantic/Mill Dam intersection as practical to reduce queues into the intersection.
- It appears that improvements at the Atlantic Road/Mill Dam Road intersection and added capacity at the Guard Booth would be beneficial to accommodate the existing traffic volumes.
- We note that any improvements within the VDOT right of way, to include turn lanes or entrance connections, will require plan review and approval, and ultimately the issuance of a Land Use Permit to perform construction activities within the right of way.
- All improvements should be coordinated with the County's proposed Wallops Research Park plans.

Please let me know if you would like to discuss further.

Bradley A. Weidenhammer, P.E.
Land Development Program Manager
Hampton Roads District

Virginia Department of Transportation
1700 N. Main Street
Suffolk, VA 23434
Office: (757) 925-1594
Fax: (757) 925-6039

Are you Virginia's next traffic fatality?
Take Virginia's Highway Safety Challenge
www.safeVAhighways.org



COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION
1700 North Main Street
SUFFOLK, VIRGINIA 23434

Gregory A. Whirley
Acting Commissioner

May 10, 2011

Paul Bull, P.E.
NASA – Wallops Flight Facility
Code 228, Bldg N-161
Wallops Island, VA 23337

Subject: Wallops Flight Facility – New Pass Office
Atlantic Road (Route 679)
Accomack County

Dear Mr. Bull,

We have completed a review of the subject 90% plans for the construction of a commercial entrance from Atlantic Road, Route 679, to a proposed Pass Office. We offer the following comments:

Land Development

- 1) Typically site development plans are submitted to VDOT for review by the Accomack County Department of Planning. This helps to coordinate the land development review and approval process. Please submit the 100% plan review to the County. If County review is not required, the final plans can be submitted to VDOT along with a letter from the County stating no review by them is required.
- 2) Please address how the long range plans will utilize this entrance for truck inspection purposes. This will impact both the geometric design and the construction methods for the entrance. Specifically:
 - What is the truck volume currently and what is the projected growth rate for this volume.
 - How are trucks currently accessing the facility. How will access change with the construction of this new entrance.
 - In the warrant analysis for the left turn lane, how was the truck traffic included in the volume estimates for vehicles using the new entrance.
- 3) Provide the Route Number for Atlantic Road – Route 679 – and clearly indicate the right-of-way line.
- 4) There is limited information on the plans related to the existing roadside swale and any modifications to it that will be required. Stormwater calculations were not submitted.
- 5) Provide profile information for the proposed 15” drainage pipe located at the commercial entrance.

Traffic Engineering

- 6) This office agrees with the Left Turn Lane Warrant Analysis submitted which indicates that a left turn lane is not warranted at this location.
- 7) The site plans submitted indicate a right turn lane with 200' taper and 100' storage, based on Appendix "F" of the Road Design Manual, this would be the correct design for this proposed site.

Materials:

The following items will be required:

- 8) The projected traffic with the truck percentage for any widening of the state roads for the next 20 years that justifies the proposed pavement thickness. This applies even to the trench widening. That should be compared to the thickness of the existing pavement and see if the existing road pavement needs beef up. The old term bituminous is not in use anymore. The current specifications use the term asphalt.
- 9) All widening of the state routes should be according to the Standard WP-2. Place this standard on sheet C-501 in lieu of the proposed sketch.
- 10) A layer of subgrade stabilization geotextile fabric, according to the VDOT special provision attached, should be placed under the aggregate subbase 21-B. This fabric layer should be depicted on the pavement section.
- 11) The groundwater is typically at the surface or very shallow (1'-2') in most of this area. Adequate drainage measures should be considered to drain the water out of the pavement structure fast.
- 12) If the apron area is going to be under VDOT jurisdiction in the future, there is also need for a pavement design with the projected traffic and truck percentage to justify that. Concrete pavement may be necessary.
- 13) Add the following statements to the general notes:
 - "All construction methods and materials in the state maintained areas shall comply with the current standards and specifications of the Virginia Department of Transportation."
 - "Any unsuitable materials encountered during the construction shall be removed and replaced with the VDOT Select Material Type II Minimum CBR-20."

If you have any questions, please contact me at (757) 925-2629.

Sincerely,



Rachel Cox, P.E.
Area Land Use Engineer

Attachments:

Special Provision for Geosynthetics
WP-2 Detail for Pavement Widening

cc: Tom Brockenbrough, Interim Planning Director, Accomack County

National Aeronautics and Space Administration
Goddard Space Flight Center
Wallops Flight Facility
Wallops Island, VA 23337-5099



Reply to Attn of: 228

June 10, 2011

Mrs. Rachael Cox, P.E.
Area Land Use Engineer
Virginia Department of Transportation
1700 North Main Street
Suffolk, VA 23434

Dear Mrs. Cox,

I am sending NASA's responses to your letter dated May 10, 2011 regarding your review of the 90% plans for the construction of a new pass office and truck inspection area for Wallops Flight Facility. Please review the following:

Land Development Comments:

- 1) We have contacted the interim Accomack County Planning Head, Mr. Tom Brockenbrough, and will submit final plans through his office for review.
- 2) The planned construction is being implemented to improve safety at the front gate at Wallops Flight Facility. Cars and trucks are both currently processed at the front gate which presents safety issues. We have averaged 2614 per year over the last 5 years. I have attached a map (Enclosure 1) that shows the existing traffic flow prior to September 2010 at the main gate. In September 2010 we made an operational change and began sending all trucks that were ultimately destined for Wallops Island directly there. This operational change resulted in an approximate reduction of 50% to the number of trucks now entering the Main Base – see attached map (Enclosure) for clarification. Based on the above, the truck volume at the Main Gate has been reduced by 50% furthermore we have experienced increased truck volume over the past 18 months due to an approximate \$100M in construction activity. A typically construction year at Wallops Flight Facility is approximately \$10M. We only anticipate a small growth in the average number of trucks coming to the Main Base (maybe 5%) due to increased mission work however the yearly volume at Main Gate has been significantly reduced by the operational change of sending trucks destined for Wallops Island directly there. The left turn analysis used a total volume (trucks and cars). I have also attaching a map (Enclosure 3) that shows the traffic flow after this project is completed.
- 3) We will provide the Route Number for Atlantic Road – Rte 679 – and we will indicate the right-of-way line on the final plans.

- 4) I have attached (Enclosure 4) storm water calculations. We will provide a typical section for the adjustment to the roadside ditch on the final plans. We are submitting storm water calculations.
- 5) Profile information for the proposed 15" drainage pipe will be included on the final plans.

Traffic Engineering Comments:

- 6) Comment regarding left turn analysis noted.
- 7) Comment regarding right turn lane distances noted.

Materials Comments:

- 8) I have attached (Enclosure 5) the pavement analysis (performed in PCASE) that demonstrates that we have designed the appropriate pavement section for this project. Will also change "bituminous" to "asphalt" on the final plans.
- 9) The WP-2 standard will be placed on sheet C-501 in reference to the widening along Atlantic Road.
- 10) Will modify the pavement detail to include subgrade stabilization geotextile fabric in accordance with VDOT special provision when referring to the Atlantic Road widening.
- 11) The widened road will be sloped the pavement section will be designed to resist damage from runoff.
- 12) See attached analysis discussed in question 8 above.
- 13) Statements will be added to the general notes.

I appreciate your assistance with this matter. If you have any questions or concerns regarding this announcement, please contact me at (757) 824-1168.

Sincerely,



Paul C. Bull, P.E.
Senior Project Manager/Civil Engineer

Enclosures:

- (1) Map showing existing conditions prior to September 2010
- (2) Map showing operational change implemented in September 2010
- (3) Map showing completed project
- (4) Storm water calculations
- (5) Pavement analysis

Cc: Tom Brockenbrough, Accomack Co. Planning Dept.

Appendix B

Responses to Comments Received on

Draft Environmental Assessment

PUBLIC COMMENTS ON DRAFT EA



April 4, 2011

8160 Atlantic Road
Wallops Island, VA 23337

Mr. Joshua A. Bundick
Lead, Environmental Planning
NASA Wallops Flight Facility, Code 250.W
Wallops Island, VA 23337

Dear Mr. Bundick:

We are writing to express our thoughts and concerns regarding the reconfiguration of the Wallops Flight Facility main entrance. We are property owners along Atlantic Road and have just reviewed the environmental assessment of the project. We understand and accept the missions of NASA, the Navy, the Marine Science Consortium and the Research Park. We have no quarrel with the proposed preferred action/preferred alternative and agree that it would improve safety, security, etc.

We do, however, have several issues with the proposed alternative to be located on Atlantic Road across from residential housing. With all the unpopulated and underdeveloped land available along Mill Dam Road, on NASA property, and to some extent along Atlantic Road we do not understand why the only preferred alternative is across from residential housing. In our opinion, we see increased safety concerns for the residents of this area, for the safety of pedestrians who commonly walk this area to reach the Ocean Deli or Royal Farms, for summer travelers along Rt. 175 to Chincoteague/Assateague. We also see a decrease in security concerns when the Badge Office and Vehicle Inspections are done one-half mile before entering the main gate with more noise, congestion, littering, etc. from the increased use of this roadway.

A traffic study performed for the Wallops Research Park in 2007 indicated that approximately 60% of traffic in the vicinity of the WFF main entrance used Mill Dam Road whereas the remaining 40% used Atlantic Road. In 2010, 37,635 temporary badges were issued according to your report. If 60% of the requests came via Mill Dam Road travelers then that means that traffic on Atlantic Road will increase by 22,581 additional cars per day if alternative one is used. That number is only for badges, not trucks. That means an increase of 61-62 cars/day assuming a 365 day usage or 86.5 cars/work day.

We do not think the assessment did a very good job assessing the alternative site and we have expressed our concerns with this assessment in the following paragraphs.

Page 1-1, P1

*In recent years there has been a marked increase in the amount of vehicular traffic

around the main entrance to WFF. The resultant increased congestion has created unsafe conditions for pedestrians and vehicles in this area. WFF proposes to reconfigure the main entrance to increase personnel safety and decrease congestion.”

RESPONSE-Why doesn't that statement apply to the alternative site especially considering all the other less congested sites already existing around the main gate especially along Mill Dam Road. And why is the safety of the civilian residents along Atlantic Road not a concern?

Page 1-7 P1

“Currently, all inspections are conducted immediately adjacent to the main entrance, which presents a safety risk to WFF security personnel and those persons having their vehicles inspected, while also compounding the effects of slowing ingress and egress in an already congested area.”

RESPONSE-The alternative site has the same actual and potential problems especially with the proximity of Rt. 175 and summer traffic on the lone road to Chincoteague/Assateague.

Page 1-7 P2 and Fig 1-4

“The resultant increased congestion has created unsafe conditions at the main entrance to WFF.”

RESPONSE-In 2010, there were 3000 vehicles/day at the main entrance. Access to the main gate is by Atlantic Road or Mill Dam Road. Both are two lane roads with Mill Dam having more of the traffic. If the alternative site is used, then Mill Dam travelers needing a pass or inspection must also use Atlantic Road. Doesn't this definitely increase congestion and use of Atlantic Road. Also see Fig 1-5 that shows 37,635 requests for temporary badges in 2010.

Page 1-8 Section 1.3.2.4

“The layout of the existing complex is unsafe because it lacks the space needed for multiple operations.”

RESPONSE-Fig 2-4 shows plenty of potential areas that do not directly impact current civilian housing in the area. Why were these areas not considered?

Page 1-11 P1

“When WFF experiences a delayed opening (e.g., due to inclement weather conditions] the traffic {i.e., employees, visitors, trucks} on both Atlantic and Mill Dam Roads can become significantly backed up.”

RESPONSE-the alternative site on Atlantic Road would back up traffic on Atlantic Road and nearby Rt. 175 causing more serious safety issues. Traffic could be backed up on Mill Dam Road a much greater distance without disrupting Rt. 175 traffic and sites do appear to be available.

Page 2-14

RESPONSE-SECURITY-Having the badges issued and truck inspections done at the alternative site {approximately 0.6 miles from the main gate} is not an INCREASED security risk? At the moment, and under the preferred site plans, these operations are under a higher security situation.

RESPONSE-SAFETY-The alternative site may lessen safety concerns for WFF personnel but it increases safety concerns for non-WFF individuals. I don't appreciate the implied message. The alternative site is only 0.6 miles from the main gate but how close is it to Rt. 175 and why is this distance not even discussed?

Page 3-4 Alternative one

"The placement of the badge office and parking lot (Fig 2-12 p 2-14} in an open field next to Navy and Coast Guard housing. {What happened to the vehicle inspection area?}. Additionally, the location of the badge office under alternative one would be approximately 90 meters {300 feet} away from civilian housing. Given the proximity of the badge office to the residences, impacts under alternative one would be considered as moderate and long term."

RESPONSE-Fig 2-12. Civilian housing refers to the residential houses on the other side of Atlantic Road. I question the 300 feet distance. Really! One football field distance would separate the nearest house on Atlantic Road from the facility. The houses along Atlantic Road are not 300 feet from the NASA fence and that is where the vehicles have to enter. 150 feet would be more accurate. Yes the impacts would be moderate at best and long term for sure.

Page 3-20 Traffic noise

RESPONSE-paragraph 2 acknowledges that traffic noise would increase in the residential area.

Page 3-21 Last Paragraph

Homes along intersections and roadways adjacent to the main base generally experience noise levels of 56-61 dBA during peak traffic periods, and 54-58 dBA during off-peak traffic periods.

RESPONSE-Keep in mind that the dB scale is a log scale so what seem to be small scale differences can actually be large differences. Table 3-10, p3-19 shows possible speech interference and sleep interference at 56-61 dBA. This does not take into account the extra noise generated by trucks in the lower gears as they leave the facility. Page 3-22 puts the sound level at 64-67 dBA at times and that approaches the 70dBA level considered harmful to humans.

Page 3-23 Alternative one

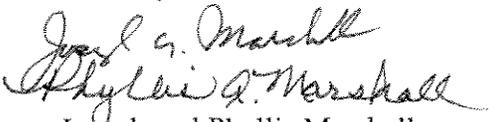
"Assuming that visitors to WFF follow the same general split (between Mill Dam Road and Atlantic Road}, locating the badge office {and truck inspection station?} on Atlantic

Road as proposed under this alternative would result in a certain increase in traffic and accompanying noise levels directly in front of residences both on and off NASA property; a long term adverse effect?"

RESPONSE-This statement is apparently made without considering just how many Mill Dam users need temporary badges.

In closing, we are not opposed to the proposed reconfiguration, only the choice of the alternative site. While the argument for the preferred site seems well thought out, the same cannot be said for the alternative site. Why pick the one area that definitely impacts NASA's neighbors? Mill Dam Road seems longer with several areas that seem more appropriate for an alternative site, yet no reasons are given for their rejection or even consideration. We feel that NASA's civilian neighbors deserve a little more consideration than has been shown so far. And we feel that the County and the State of Virginia should show some concern for the health and safety of the residents of the area and not just rubber stamp NASA projects because they provide more jobs.

Sincerely,


Joseph and Phyllis Marshall

Mailing address:
Dr. and Mrs. Joseph Marshall
194 McCormick Hollow Road
Morgantown, WV 26508
304-290-5960

Comments

Mary ~~Gibson~~ Gibson
Atlantic

0930

3/15/11



- 1) - Construction on Atlantic Road - concern
- 2) - Diminish quality of life for residences + military families - talked to several homeowners
- 3) → Ocean Deli + Royal Farms → May - October
- more potential accidents
- 4) - Bicycling + joggling - would interfere w/ that
- August '02 - lots of building since she moved here
- speeding - 60-70 mph }
- trash + litter }
- would be a "real negative" for us to build Alternative One.
- 5) - preserve as many trees as possible



U.S. EPA COMMENTS ON DRAFT EA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

11 APR 2011

Joshua Bundick
NASA Wallops Flight Facility
Code 250. W
Wallops Island, VA 23337

RE: Draft Environmental Assessment (DEA) Reconfiguration of the Wallops Flight Facility
Main Entrance, Wallops Island, Accomack County, Virginia, March, 2011

Dear Mr. Bundick:

In accordance with the National Environmental Policy Act of 1969 (NEPA) and Section 309 of the Clean Air Act the U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Assessment for the Reconfiguration of the Wallops Flight Facility (WFF) Main Entrance located at the WFF Main Base in Wallops Island, Accomack County, Virginia. The proposed project involves the reconfiguring of the main entrance to the Main Base currently located on Mill Dam Road, which includes badge office and visitor parking area, security personnel parking area, truck inspection area, guard house and canopy, a traffic roundabout and a shipping and receiving facility. The purpose and need of the proposed action is to separate vehicles, trucks and people to improve personnel safety and decrease congestion caused by the current main entrance lay-out to WFF. A Risk Assessment Code (RAC) score of three (3) for the existing configuration was evaluated to identify safety concerns.

NASA proposed three alternatives, including the no action alternative, the preferred alternative comprised of either two or four phases of construction, and alternative one comprised of four construction phases. The preferred alternative at final build out involves the construction of a new badge office, visitor parking lot and truck inspection lot on Atlantic Road near Mill Dam Road, expanding security personnel parking areas, as well as the construction of a traffic roundabout at the intersection of Atlantic and Mill Dam Roads, construction of a new shipping and receiving facility, guard house and expansion of traffic lanes surrounding the guard house. Alternative one is very similar to the preferred alternative, with the difference being the location of the new badge office and parking lot, which is proposed for Atlantic Road closer to the intersection of Route 175.

EPA appreciated the opportunity of review the environmental document prepared to assist decision-making for this project. EPA believes the study is deficient in some areas, such as traffic analysis, which would aid in establishing need for the project, and therefore selection of an appropriate action. Additionally, it was unclear that other aspects such as environmental justice or cumulative impacts were considered. EPA supports minimization of impacts to aquatic and terrestrial environment, and hopes to see innovative stormwater management and low impact

development techniques incorporated in project design. Please see detailed comments regarding purpose and need, assessment and impacts attached to this letter.

The need for the action should identify and describe the underlying problem or deficiency as well as facts and analyses supporting the problem. While the purpose and need of the proposed action is to address safety and congestion at the main entrance to WFF, it is not clear what degree of safety and congestion is sought to be improved nor is it clear what degree the proposed alternatives meets the desired level of improvement. Since a range of alternatives evaluated is defined by the purpose and need, EPA encourages that the need for this project be clarified by providing additional background information.

Adverse impacts associated with the proposed action may result in up to 3.48 acres of forest. It appears that there will be cleared areas adjacent to the new badge building. Please clarify why this forested area is being cleared as it is not in the footprint of the building; any plans for replanting should be stated in the document. Discuss any temporary impacts that may be associated with staging or stock-piling for construction activities. EPA recommends that opportunities to avoid and minimize impacts to forest be explored.

The document states that there will be no impacts to wetlands or other aquatic resources. Although no aquatic resources will be directly impacted, it would be helpful to include a clear map and description of any resources in the vicinity of the project. Please provide additional information about stormwater control measures and best management practices (BMPs) that will be incorporated into design plans. The inclusion of low impact development (LID) practices should be considered and are strongly encouraged. LID is a natural approach to land development and stormwater management designed to reduce impacts on watershed hydrology and aquatic resources. Enhancements to site designs can result in significant reductions in stormwater quantity and quality impacts prior to the development of any structural stormwater practices on a site. In addition to the implementation of LIDs, the stormwater treatment and management structures for the project should not be placed in wetland areas.

We would appreciate the opportunity to discuss our questions and comments at your convenience. Thank you for allowing EPA the opportunity to review and comment on the DEA for the Wallops Flight Facility Main Entrance Reconfiguration. If you have questions regarding these comments, the staff contact for this project is Ms. Alaina DeGeorgio; she can be reached at 215-814-2741.

Sincerely,



Barbara Rudnick
NEPA Team Leader

Enclosure



Detailed Comments on the WFF Main Entrance Reconfiguration Draft EA

Purpose and Need

The latest traffic analysis was conducted in 2007, but it is not clear which intersections were included in the study or if the main entrance was part of the study. Based on the large amount of growth and expansion the DEA indicates is occurring and will occur at WFF, do conditions represented in the 2007 traffic analysis accurately represent existing or future conditions? Section 3.10.2 of the DEA states that the 'Y' intersection at Atlantic and Mill Dam Roads is contributing to traffic delays, while other information in the document points out that the level of service (LOS) at this intersection is a 'B'. To ensure that the appropriate traffic measures are implemented, a detailed traffic study should be conducted.

A major component of the project appears to be related to traffic with the proposed addition of a traffic roundabout at the intersection of Atlantic and Mill Dam Roads, and expanded traffic lanes around the guard shack for entry and exit of WFF. The document states that the proposed traffic improvements will assist the flow of traffic, reduce crashes and injuries, and decrease time to exit the facility in the event of an emergency. Analysis or documentation supporting these statements is needed. More specific questions are below.

- A RAC score of 3 was received due to security personnel having to cross traffic. How many security personnel are located at the guard station and how frequently do they need to cross lanes of traffic? Is there an existing cross walk for security personnel to use, or signage notifying vehicular traffic of pedestrians? What is the rate of incidence involving security or other pedestrians and motor vehicles?
- The project is proposed for the WFF main entrance. This implies that there are additional side entrances. Is a combination of upgrades to multiple entrance points feasible to meet the needs of this project? Is this the main entry point for employees of WFF?
- A detailed traffic analysis of the project area is strongly recommended. Discuss the hours of operation at the gate, if security is present at all hours of the day, if WFF employees are entering the facility at all hours, if there are hours that limit visitor entries or deliveries, if peak hours of main entrance use have been identified, and the amount queuing at truck inspections lanes, entry and exit points.
- A component of the project would involve locating a new shipping and receiving building outside of the WFF fence. How would this location reduce security risks? How does this component of the propose project related to the purpose and need of increased personnel safety?
- Figure 1-2 appears to be missing from the document. Please provide a figure of the existing conditions at the main entrance.
- What is the expected future growth or increase in usage of the main entrance for the projected future? Will the reconfiguration of the entrance accommodate this growth in the 5 or 10 year future? How will proposed traffic changes accommodate future growth? What is the design year for the project?
- How frequently do visitors go to the badge office and travel directly to Wallops Island? Are any visitor badges given at the entrance to this facility? Does the main entrance badge office handle all visitors for the whole facility?



- What is the average wait time at the badge office? Would extra staff help alleviate this problem? How often is the maximum capacity of the badge office exceeded?

Alternatives Analysis

- Section 2.3 Alternatives Screening Process states that several design concepts were eliminated because these designs may have required the need to hire additional staff to oversee a separate truck inspection area. It is not clear why this factor is limiting or how it relates to purpose and need of the proposed project. It appears that other components of preferred alternative would necessitate the need for additional employees. Increasing the amount of staff at existing facilities may be a viable alternative that was not considered in the document.
- Steps to improve existing structures or signage may be a viable alternative that was not considered in the document.
- How much space is needed and proposed to accommodate truck inspection lanes? Discuss the current amount of queuing as well as how the proposed action will affect queuing. Affects of the addition of turn lanes affect the flow of traffic should also be included.
- Discuss coordination efforts relating to public road improvements associated with the proposed action. Please include correspondences relating to traffic changes as an appendix to the DEA. Coordination correspondences relating to this project with other federal, state and local agencies, including consultation relating to cultural and historic resources, should be included.
- Under the preferred alternative unique cargo trucks delivering to Wallops Island would now be inspected at the Mainland security post. How will diverting these trucks away from the main entrance to WFF affect traffic? Discuss any additional upgrades that may be needed at the Mainland security post or Mainland truck inspection area.

Environmental Justice

A more detailed Environmental Justice (EJ) analysis is needed. EJ assessment should identify potential populations of concern, and conduct an assessment to determine if disproportionately high and/or disparate impacts occur or have to potential to adversely impact those populations. It is not clear if necessary level of study has been conducted to identify potential populations that may exist in the study area. Additional discussion regarding adverse impacts, including increased noise and traffic delays, should be included. Discuss what specific outreach and public involvement efforts have taken place for EJ communities related to this project.

Affected Environment and Environmental Consequences

- Section 3.5.1 for noise does not appear to describe existing noise conditions that may be encountered by visitors, employees and residences located near WFF. Including up to date noise information is important in order to determine the effects that the proposed project would have on noise. The baseline year used for noise was 1992. Based on the



amount of grow and future expansion of WFF, an updated of noise analysis and update of nearby noise receptors is encouraged.

- What are the predicted noise levels during construction and operation of the proposed alternatives? Has noise analysis included a projection of conditions with predicted WFF expansion and gate volume?

Cumulative Impacts

Cumulative impact analysis should include all past, present and reasonably foreseeable future actions. It is suggested that a secondary and cumulative effects analysis begin with defining the geographic and temporal limits of the study; this is generally broader than the study area of the project. Geographic boundaries are typically shown on a map; and a historic baseline is often set at a major event changing the local environment. It appears that certain resources, including noise, transportation and cultural, were not evaluated in the cumulative impacts section of the document. These resources should be evaluated cumulatively.



DEQ CONSOLIDATED COMMENTS ON DRAFT EA
AND
FEDERAL CONSISTENCY DETERMINATION



COMMONWEALTH of VIRGINIA

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May 2, 2011



Mr. Joshua A. Bundick
WFF NEPA Manager
Environmental Office
NASA Wallops Flight Facility
Wallops Island, Virginia 23337

RE: Draft Environmental Assessment and Federal Consistency Determination for the Reconfiguration of the Wallops Flight Facility Main Entrance, Accomack County, (DEQ 11-037F).

Dear Mr. Bundick:

The Commonwealth of Virginia has completed its review of the March 2011 Draft Environmental Assessment (EA) and Federal Consistency Determination (FCD) (received March 8, 2011) for the reconfiguration of the Wallops Flight Facility main entrance in Accomack County. The Department of Environmental Quality (DEQ) is responsible for coordinating Virginia's review of federal environmental documents and responding to appropriate federal officials on behalf of the Commonwealth. DEQ is also responsible for coordinating Virginia's review of FCDs submitted pursuant to the Coastal Zone Management Act (CZMA) and providing the state's response. The following agencies and locality participated in the review of the EA and FCD for this proposal:

Department of Environmental Quality
Department of Conservation and Recreation
Department of Game and Inland Fisheries
Virginia Marine Resources Commission
Department of Forestry
Department of Health
Department of Historic Resources
Department of Transportation
Accomack County

The Department of Agriculture and Consumer Services and Accomack-Northampton Planning District Commission was also invited to comment on the proposal.

PROJECT DESCRIPTION

The National Aeronautics and Space Administration (NASA) proposes to reconfigure the main entrance at the Goddard Space Flight Center's (GSFC) Wallops Flight Facility (WFF) in Accomack County. Under the proposed action, NASA would reconfigure the main entrance to the Main Base to alleviate safety concerns created by the current layout. The proposal includes construction of a:

- badge office and visitor parking area;
- security personnel parking area;
- truck inspection area;
- guard house and canopy;
- traffic roundabout; and
- shipping and receiving facility.

Construction would occur in either a two or four phases depending on available funding.

CONCLUSION

Based on the information provided in the Draft Environmental Assessment and comments from reviewers, the Commonwealth of Virginia has no objection to the proposal as presented, provided NASA complies with all applicable laws and regulations.

Provided activities are performed in accordance with the recommendations which follow, this project is unlikely to have significant effects on ambient air quality, water quality, important farmland, wetlands, and wildlife resources.

ENVIRONMENTAL IMPACTS AND MITIGATION

1. Water Quality & Wetlands. According to the EA (page 3-2), no surface waters or wetlands are present in or near the project area.

1(a) Agency Jurisdiction. The State Water Control Board (SWCB) promulgates Virginia's water regulations, covering a variety of permits to include Virginia Pollutant Discharge Elimination System (VPDES) Permit, Virginia Pollution Abatement Permit, Surface and Groundwater Withdrawal Permit, and the Virginia Water Protection Permit (VWPP). The VWPP is a state permit which governs wetlands, surface water, and surface water withdrawals/impoundments. It also serves as § 401 certification of the federal *Clean Water Act* § 404 permits for dredge and fill activities in waters of the U.S. The VWPP Program is under the Office of Wetlands and Water Protection/Compliance, within the DEQ Division of Water Quality Programs. In addition to central office staff

Mr. Joshua A. Bundick
Reconfiguration of the Wallops Flight Facility Main Entrance

that review and issue VWP permits for transportation and water withdrawal projects, the seven DEQ regional offices perform permit application reviews and issue permits for the covered activities.

1(b) Agency Findings.

(i) Virginia Water Protection Permit

The Virginia Water Protection Permit program at DEQ Tidewater Regional Office (TRO) has no comments on the proposed reconfiguration.

(ii) Virginia Pollutant Discharge Elimination System

According to the Virginia Pollutant Discharge Elimination System program at DEQ-TRO, the project would not require VPDES permitting.

For additional information regarding the VWPP program, contact DEQ-TRO, Bert Parolari at (757) 518-2166. For additional information on the VPDES program, contact DEQ-TRO, James McConathy at (757) 518-2165.

2. Subaqueous Lands Management. According to the FCD (Appendix A, page 5), the project would not result in impacts to subaqueous lands.

2(a) Agency Jurisdiction. The Virginia Marine Resources Commission (VMRC), pursuant to Section 28.2-1204 of the Code of Virginia, has jurisdiction over any encroachments in, on, or over any state-owned rivers, streams, or creeks in the Commonwealth. For any development that involves encroachments channelward of ordinary high water along natural rivers and streams, a permit is required from VMRC.

The VMRC serves as the clearinghouse for the Joint Permit Application (JPA) used by the:

- VMRC for encroachments on or over state-owned subaqueous beds as well as tidal wetlands;
- U.S. Army Corps of Engineers (Corps) for issuing permits pursuant to Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act;
- DEQ for issuance of a Virginia Water Protection Permit; and
- local wetlands board for impacts to wetlands.

2(b) Agency Comments. According to VMRC, it appears that the proposed project does not fall under VMRC's jurisdiction. Therefore, no authorization would be required from VMRC.

Mr. Joshua A. Bundick
Reconfiguration of the Wallops Flight Facility Main Entrance

For further information, contact VMRC, George Badger at (757) 414-0710.

3. Erosion and Sediment Control, and Stormwater Management. According to the EA (page 3-5), soils could be transported off-site during construction by wind or precipitation during storm events. However, as the soils within the sites are gently sloped and as NASA would implement strict erosion and sediment controls, it is expected that any losses would be minor. The document (page 3-8) states that construction and demolition activities at WFF are subject to Virginia Stormwater Management Program permitting. NASA and its tenants develop site-specific Stormwater Pollution Prevention Plans (SWPPPs) and acquire the necessary permits as part of early project planning.

3(a) Agency Jurisdiction. DCR's Division of Soil and Water conservation administers the *Virginia Erosion and Sediment Control Law and Regulations (VESCL&R)* and *Virginia Stormwater Management Law and Regulations (VSWML&R)*.

3(b) Erosion and Sediment Control and Stormwater Management Plans. According to the Department of Conservation and Recreation (DCR), NASA and its authorized agents conducting regulated land-disturbing activities on private and public lands in the state must comply with *VESCL&R* and *VSWML&R*, including coverage under the general permit for stormwater discharge from construction activities, and other applicable federal nonpoint source pollution mandates (e.g. Clean Water Act-Section 313, federal consistency under the Coastal Zone Management Act). Clearing and grading activities, installation of staging areas, parking lots, roads, buildings, utilities, borrow areas, soil stockpiles, and related land-disturbing activities that result in the land disturbance of equal to or greater than 10,000 square feet would be regulated by *VESCL&R*. Accordingly, NASA must prepare and implement an erosion and sediment control (ESC) plan to ensure compliance with state law and regulations. The ESC plan is submitted to the DCR Regional Office that serves the area where the project is located for review for compliance. NASA is ultimately responsible for achieving project compliance through oversight of on site contractors, regular field inspection, prompt action against non-compliant sites, and other mechanisms consistent with agency policy. [Reference: VESCL §10.1-567]

3(c) Virginia Stormwater Management Program General Permit for Stormwater Discharges from Construction Activities. DCR is responsible for the issuance, denial, revocation, termination and enforcement of the Virginia Stormwater Management Program (VSMP) General Permit for Stormwater Discharges from Construction Activities related to municipal separate storm sewer systems (MS4s) and construction activities for the control of stormwater discharges from MS4s and land disturbing activities under the Virginia Stormwater Management Program.

Therefore, the operator or owner conducting land-disturbing activities equal to or

greater than one acre are required to register for coverage under the General Permit for Discharges of Stormwater from Construction Activities and develop a project-specific stormwater pollution prevention plan (SWPPP). Construction activities requiring registration also includes land disturbance of less than one acre of total land area that is part of a larger common plan of development or sale if the larger common plan of development will ultimately disturb equal to or greater than one acre. The SWPPP must be prepared prior to submission of the registration statement for coverage under the general permit and the SWPPP must address water quality and quantity in accordance with the VSMP *Permit Regulations*. General information and registration forms for the General Permit are available on DCR's website at: http://www.dcr.virginia.gov/soil_and_water/vsmp.shtml. [Reference: Virginia Stormwater Management Act §10.1-603.1 *et seq.*; VSMP Permit Regulations 4 VAC-50 *et seq.*]

4. Air Pollution Control. According to the EA (page 3-11), Wallops Main Base is located in Accomack County, an attainment area (an area considered to have air quality that is as good as or better than the National Ambient Air Quality Standards) for all seven listed criteria air pollutants. To minimize impacts during construction, site-specific dust suppression methods would be implemented to minimize windblown and vehicular-borne fugitive dust generated from the construction site areas. Vehicles and equipment used for construction would be maintained in good working order.

4(a) Agency Jurisdiction. DEQ's Air Quality Division, on behalf of the State Air Pollution Control Board, is responsible to develop regulations that become Virginia's *Air Pollution Control Law*. DEQ is charged to carry out mandates of the state law and related regulations as well as Virginia's federal obligations under the *Clean Air Act* as amended in 1990. The objective is to protect and enhance public health and quality of life through control and mitigation of air pollution. The division ensures the safety and quality of air in Virginia by monitoring and analyzing air quality data, regulating sources of air pollution, and working with local, state and federal agencies to plan and implement strategies to protect Virginia's air quality. The appropriate regional office is directly responsible for the issue of necessary permits to construct and operate all stationary sources in the region as well as to monitor emissions from these sources for compliance. As a part of this mandate, the environmental documents of new projects to be undertaken in the state are also reviewed. In the case of certain projects, additional evaluation and demonstration must be made under the general conformity provisions of state and federal law.

4(b) Agency Findings. According to the DEQ Air Division, the project site is located in an ozone (O₃) attainment area.

4(c) Recommendation. NASA should take all reasonable precautions to limit emissions of volatile organic compounds (VOCs) and oxides of nitrogen (NO_x),

principally by controlling or limiting the burning of fossil fuels.

4(d) Requirements.

(i) Fugitive Dust

During construction, fugitive dust must be kept to a minimum by using control methods outlined in 9 VAC 5-50-60 *et seq.* of the *Regulations for the Control and Abatement of Air Pollution*. These precautions include, but are not limited to, the following:

- Use, where possible, of water or chemicals for dust control;
- Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
- Covering of open equipment for conveying materials; and
- Prompt removal of spilled or tracked dirt or other materials from paved streets and removal of dried sediments resulting from soil erosion.

(ii) Open Burning

If project activities include the burning of construction or demolition material, this activity must meet the requirements under 9 VAC 5-130 *et seq.* of the *Regulations* for open burning, and it may require a permit. The *Regulations* for open burning provide for, but do not require, the local adoption of a model ordinance concerning open burning. NASA should contact Accomack County officials to determine what local requirements, if any, exist.

5. Solid and Hazardous Wastes and Hazardous Materials. The EA (page 3-24) states that construction activities would include the use of hazardous materials and hazardous waste generation (i.e., solvents, hydraulic fluid, oil, and antifreeze). With implementation of safety measures and proper procedures for the handling, storage, and disposal of hazardous materials and wastes during construction activities, no adverse impacts are anticipated during construction.

5(a) Agency Jurisdiction. Solid and hazardous wastes in Virginia are regulated by the Virginia Department of Environmental Quality, the Virginia Waste Management Board (VWMB) and the U.S. Environmental Protection Agency. They administer programs created by the federal Resource Conservation and Recovery Act, Comprehensive Environmental Response Compensation and Liability Act, commonly called Superfund, and the Virginia Waste Management Act. DEQ administers regulations established by the VWMB and reviews permit applications for completeness and conformance with facility standards and financial assurance requirements. All Virginia localities are required, under the Solid Waste Management Planning Regulations, to identify the strategies they will follow on the management of their solid wastes to include items such

Mr. Joshua A. Bundick
Reconfiguration of the Wallops Flight Facility Main Entrance

as facility siting, long-term (20-year) use, and alternative programs such as materials recycling and composting.

5(b) Agency Findings. The DEQ Division of Land Protection and Revitalization (DLPR) conducted a Geographic Information System (GIS) data base search and found no waste sites within a half-mile radius of the project site. A cursory review of Waste Division data files determined that there are several hazardous waste sites and Formerly Used Defense Sites (FUDS) located within the same zip code at the project site. However, their proximity to the project site is unknown. These sites include:

Hazardous Waste

- NASA GSFC Wallops Flight Facility (VA8800010763) large quantity generator (LQG) (Active)
- NASA GSFC Wallops Flight Facility (VA7800020888) LQG (Active)
- NASA GSFC Wallops Flight Facility (VA7800020888) treatment storage and disposal (TSD) (Active)

FUDS

- Wallops ISL (C03VA0301, VA9799F1697)

5(c) Requirements. All construction and demolition debris must be characterized in accordance with the *Virginia Hazardous Waste Management Regulations* and disposed of at an appropriate facility.

(i) Waste Management

Any soil that is suspected of contamination or wastes that are generated during construction-related activities must be tested and disposed of in accordance with applicable federal, state, and local laws and regulations.

(ii) Asbestos-containing Material and Lead-based Paint

All structures being demolished or removed should be checked for asbestos-containing materials (ACM) and lead-based paint (LBP) prior to demolition. If ACM or LBP are found, in addition to the federal waste-related regulations mentioned above, state regulations 9 VAC 20-80-640 for ACM and 9 VAC 20-60-261 for LBP must be followed.

5(d) Recommendations.

(i) Comprehensive Environmental Response, Compensation and Liability Act

DEQ's Federal Facilities Restoration Program recommends contacting NASA WFF, T.J. Meyer at (757) 824-1987 for information concerning Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) obligations at the installation. Coordinate with Mr. Meyer prior to initiating any land-, sediment-, or groundwater-disturbing activities associated with the main entrance reconfiguration.

(ii) Web Search

The following website may be accessed to locate additional information on listed waste sites using their identification numbers:

<http://www.epa.gov/superfund/sites/cursites/index.htm> or
http://www.epa.gov/enviro/html/rcris/rcris_query_java.html.

(iii) Pollution Prevention

DEQ encourages all construction projects and facilities to implement pollution prevention principles, including the reduction, reuse, and recycling of all solid wastes generated. All generation of hazardous wastes should be minimized and handled appropriately.

6. Petroleum Storage Tanks.

6(a) Petroleum Storage Tank Cleanups. According to DEQ-TRO, there have been no petroleum releases reported at or adjacent to the proposed project site at Wallops Flight Facility. Petroleum contaminated soils or groundwater generated during construction of this project must be characterized and disposed of properly.

6(b) Requirements. NASA must comply with the following requirements of the Storage Tank Program.

- The relocation, removal or closure of any regulated aboveground or underground petroleum storage tank(s) must be reported to DEQ TRO.
- Spills or other accidental releases of petroleum or other hazardous products from construction activities must be reported to the DEQ Tidewater Regional Office Pollution Response Program (Prep).
- If evidence of a petroleum release is discovered during implementation of the project, it must be reported to DEQ-TRO.

Mr. Joshua A. Bundick
Reconfiguration of the Wallops Flight Facility Main Entrance

- If any regulated ASTs or USTs are closed, relocated or altered, NASA must notify DEQ-TRO.
- If the construction of this project will include the use of portable ASTs (>660 gallons) for equipment fuel, these tank(s) must be registered with DEQ-TRO using AST Registration form 7540-AST. This form is available at the DEQ web site at www.deq.virginia.gov.

7. Herbicides and Pesticides. DEQ recommends that the use of herbicides or pesticides for construction or landscape maintenance should be in accordance with the principles of integrated pest management. The least toxic pesticides that are effective in controlling the target species should be used. Contact the Department of Agriculture and Consumer Services at (804) 786-3501 for more information.

8. Natural Heritage Resources. The document does not discuss the Virginia Natural Heritage Program administered by the Virginia Department of Conservation and Recreation Division of Natural Heritage and possible project impacts on any natural heritage resources in the area.

8(a) Agency Jurisdiction. The mission of the Virginia Department of Conservation and Recreation is to conserve Virginia's natural and recreational resources. DCR supports a variety of environmental programs organized within seven divisions including the Division of Natural Heritage. The Natural Heritage Program's (DCR-DNH) mission is conserving Virginia's biodiversity through inventory, protection, and stewardship. The *Virginia Natural Area Preserves Act*, 10.1-209 through 217 of the *Code of Virginia*, was passed in 1989 and codified DCR's powers and duties related to statewide biological inventory: maintaining a statewide database for conservation planning and project review, land protection for the conservation of biodiversity, and the protection and ecological management of natural heritage resources (the habitats of rare, threatened, and endangered species, significant natural communities, geologic sites, and other natural features).

8(b) Agency Findings.

(i) Natural Heritage Resources

DCR-DNH searched its Biotics Data System for occurrences of natural heritage resources from the project area. The Biotics Data System documents the presence of natural heritage resources in the project area. However, due to the scope of the activity and the distance to the resources, DCR-DNH does not anticipate that the project will adversely impact these natural heritage resources.

(ii) Threatened and Endangered Plant and Insect Species

The Endangered Plant and Insect Species Act of 1979, Chapter 39, §3.1-102- through 1030 of the *Code of Virginia*, as amended, authorizes the Virginia Department of Agriculture and Consumer Services (VDACS) to conserve, protect and manage endangered species of plants and insects. The VDACS Virginia Endangered Plant and Insect Species Program personnel cooperates with the U.S. Fish and Wildlife Service, DCR-DNH and other agencies and organizations on the recovery, protection or conservation of listed threatened or endangered species and designated plant and insect species that are rare throughout their worldwide ranges. In those instances where recovery plans, developed by the U.S. Fish and Wildlife Service, are available, adherence to the order and tasks outlines in the plans are followed to the extent possible.

VDACS has regulatory authority to conserve rare and endangered plant and insect species through the Virginia Endangered Plant and Insect Species Act. Under a Memorandum of Agreement established between VDACS and DCR, DCR has the authority to report for VDACS on state-listed plant and insect species. DCR finds that the current activity will not affect any documented state-listed plants or insects.

(iii) State Natural Area Preserves

DCR files do not indicate the presence of any State Natural Area Preserves under the agency's jurisdiction in the project vicinity.

8(c) Recommendation. NASA should contact DCR-DNH at (804) 786-7951 to secure updated information on natural heritage resources if a significant amount of time passes before the project is implemented. New and updated information is continually added to the Biotics Data System.

9. Wildlife Resources and Protected Species. According to the EA (page 3-28), long-term adverse impacts to terrestrial wildlife or migratory birds would be anticipated due to the loss of forested land to developed land. However, the document concludes that given the amount of suitable habit nearby, impacts would not be substantial.

9(a) Agency Jurisdiction. The Department of Game and Inland Fisheries (DGIF), as the Commonwealth's wildlife and freshwater fish management agency, exercises enforcement and regulatory jurisdiction over wildlife and freshwater fish, including state or federally listed endangered or threatened species, but excluding listed insects (*Virginia Code* Title 29.1). The DGIF is a consulting agency under the *U.S. Fish and Wildlife Coordination Act* (16 U.S.C. sections 661 *et seq.*), and provides environmental analysis of projects or permit applications coordinated through DEQ and several other state and federal agencies. DGIF determines likely impacts upon fish and wildlife

Mr. Joshua A. Bundick
Reconfiguration of the Wallops Flight Facility Main Entrance

resources and habitat, and recommends appropriate measures to avoid, reduce, or compensate for those impacts.

9(b) Agency Findings. According to DGIF records, the state-listed Threatened bald eagle has been documented in the project area. However the project site falls outside the management zone for the nest DGIF currently documents. Therefore, DGIF does not anticipate this project to result in adverse impacts upon the eagles using this nest. However, it is possible that new bald eagle nests have been constructed in or near the project area during the 2010 nesting season and new nests may be adversely impacted by the project activities.

9(c) Recommendations. DGIF recommends that NASA adhere to the following recommendations for the protection of the state-listed Threatened bald eagle to avoid adverse impacts upon them.

- Contact the Center for Conservation Biology at (757) 221-2247 or visit their website at <http://ccb-wm.org/virginiaeeagles/> to determine if any new bald eagle nests were detected during the 2010 surveys.
- Search Accomack County and adjacent counties to ensure the capture of any nests that may be attributed to a neighboring county.
- Contact DGIF for further consultation regarding new nests if any have been documented within 0.25 mile (1,320 feet) of the project area.

DGIF offers the following recommendations to minimize overall impacts to wildlife and natural resources:

- Avoid and minimize impacts to undisturbed forest, wetlands, and streams to the fullest extent practicable;
- Maintain undisturbed naturally vegetated wooded buffers of at least 100 feet in width around all on-site wetlands and on both sides of all perennial and intermittent streams;
- Design stormwater to replicate and maintain the hydrographic condition of the site prior to the change in landscape. This should include, but not be limited to, utilizing bioretention areas, and minimizing the use of curb and gutter in favor of grassed swales. Bioretention areas (also called rain gardens) and grass swales are components of Low Impact Development (LID). They are designed to capture stormwater runoff as close to the source as possible and allow it to slowly infiltrate into the surrounding soil. They benefit natural resources by filtering pollutants and decreasing downstream runoff volumes;
- Adhere to erosion and sediment controls during ground disturbance; and
- Adhere to a time-of-year restriction from March 15 through August 15 of any year for all tree removal and ground clearing to protect resident and migratory songbird during nesting.

For more information regarding these recommendations, contact DGIF Amy Ewing, DGIF at (804) 367-2733.

10. Forest Resources. According to the EA (page 3-26), the proposed project would result in the loss of approximately 3.48 acres of trees. All land clearing activities would be performed in accordance with applicable laws and regulations and would utilize appropriate BMPs. Orange tape would be tied around any hardwoods that could be spared and the contractor would be made aware to avoid the marked trees during tree removal.

10(a) Agency Jurisdiction. The mission of the Virginia Department of Forestry (VDOF) is to protect and develop healthy, sustainable forest resources for Virginians. VDOF was established in 1914 to prevent and suppress forest fires and reforest bare lands. Since the Department's inception, it has grown and evolved to encompass other protection and management duties including: protecting Virginia's forests from wildfire, protecting Virginia's waters, managing and conserving Virginia's forests, managing state-owned lands and nurseries, and managing regulated incentive programs for forest landowners.

10(b) Agency Findings. VDOF finds that the proposed project would have no significant impact on the forest resources of the Commonwealth.

10(c) Recommendations. In general, trees not slated for removal should be left in groupings or clusters to provide aesthetic and environmental benefits, as well as reducing costs associated with maintaining open space, to the extent practicable. The following measures are recommended during construction to protect trees not slated for removal.

- Mark and fence trees at least to the dripline or the end of the root system, whichever extends farther from the tree stem.
- Mark trees with highly visible ribbon so that equipment operators can see the protected areas easily.
- Do not park heavy equipment, move or stack construction materials near trees which can damage root systems by compacting the soil.
- Use mats to minimize soil compaction and mechanical injury to plants.
- Stockpile soil away from trees to avoid killing the root systems.

Mr. Joshua A. Bundick
Reconfiguration of the Wallops Flight Facility Main Entrance

Questions pertaining to mitigation and tree protection may be addressed to the Department of Forestry, Todd Groh at (434) 220-9044.

11. Public Water Supply.

11(a) Agency Jurisdiction. The Virginia Department of Health (VDH), Office of Drinking Water (ODW), reviews projects for the potential to impact public drinking water sources (groundwater wells and surface water intakes).

11(b) Agency Findings. According to VDH-ODW, there are five groundwater wells within a 2,114-foot radius of the project site. These wells are owned and operated by WFF. There are no surface water intakes located within a 5-mile radius of the proposed project site. The project site does not fall within Zone 1 (up to 5 miles into the watershed) or Zone 2 (greater than 5 miles into the watershed) of any public surface water sources. For public surface water intakes Zone 1 is the area included within a 5-mile radius around the surface water intake and Zone 2 is the entire up-gradient area of the watershed. For public groundwater wells Zone 1 is an area included within a 1,000-foot radius the well and Zone 2 is a radius of one mile.

11(c) Requirement. Potential impacts to public water distribution systems must be verified by the local utility. NASA should field locate and mark wells to ensure the protection of wellheads during construction. Best management practices should be employed on the project site, including appropriate erosion and sediment control.

11(d) Conclusion. VDH-ODW concludes that there are potential impacts to public drinking water sources due to this project.

Contact VDH, Diedre Forsgren at (804) 864-7241 for additional information.

12. Transportation Impacts. According to the EA (page 3-32), temporary impacts to traffic flow would occur during construction activities due to an increase in the volume of construction-related traffic on roads in the immediate vicinity of the proposed project site. NASA would coordinate all transportation activities that would have the potential to affect public roads, including closures, traffic control, safety issues, etc. with Accomack County and the Virginia Department of Transportation (VDOT) Accomack Residency Office. NASA consulted with VDOT to discuss the reconfiguration of the main entrance to the Main Base. Any improvements within the VDOT right-of-way, including turn lanes or entrance connections, would require plan review and approval, and ultimately the issuance of a Land Use Permit to perform construction activities within the right-of-way.

12(a) Agency Jurisdiction. The Virginia Department of Transportation (VDOT) provides comments pertaining to potential impacts to existing and future transportation systems.

12(b) Agency Findings. VDOT's preliminary review indicates that all study intersections are operating at an acceptable level of service. However, detailed traffic analysis must be provided before project initiation.

12(c) Requirements. According to VDOT, the reconfiguration must be coordinated with the VDOT Land Development program manager to ensure compliance with access management policies, traffic control practices and all applicable VDOT standards. Also, a land use permit will be required for any work in VDOT easements and right-of-way along with a traffic operation and safety analysis.

12(d) Recommendation. VDOT encourage the development of bicycle and pedestrian accommodations linking facilities to enhance access while increasing mobility around the multimodal network.

12(e) Conclusion. VDOT has no objections to the proposed reconfiguration.

For more information, contact VDOT, Koustubh Jain at (757) 925-3686.

13. Historic Structures and Archaeological Resources. According to the EA (page 3-35), no historic structures would be impacted by the proposed reconfiguration. The proposed Badge Office site would be located in a well established forest with minimal potential for archaeological sensitivity.

13(a) Agency Jurisdiction. The Department of Historic Resources (DHR) conducts reviews of projects to determine their effect on historic structures or cultural resources under its jurisdiction. DHR, as the designated State's Historic Preservation Office (SHPO), ensures that federal actions comply with Section 106 of the *National Historic Preservation Act of 1966 (NHPA)*, as amended, and its implementing regulation at 36 CFR Part 800. The *NHPA* requires federal agencies to consider the effects of federal projects on properties that are listed or eligible for listing on the National Register of Historic Places. Section 106 also applies if there are any federal involvements, such as licenses, permits, approvals or funding.

13(b) Agency Comments. According to DHR, NASA has initiated direct consultation with DHR regarding the potential impacts of this project on historic resources. DHR requests that NASA continue to consult directly with DHR pursuant to Section 106 of the *National Historic Preservation Act* (as amended).

13(c) Requirement. Pursuant to *Section 106* and its implementing regulations codified at 36 CFR Part 800, NASA must continue to coordinate with DHR.

14. Local Review.

14(a) Agency Jurisdiction. In accordance with CFR 930, Subpart A, § 930.6(b) of the *Federal Consistency Regulations*, DEQ, on behalf of the state, is responsible for securing necessary review and comment from other state agencies, the public, regional government agencies, and local government agencies, in determining the Commonwealth's concurrence or objection to a federal consistency certification.

14(b) Local Comments. The Accomack County Administrator's Office has no comments on the proposed action.

Contact Accomack County, Steve Miner at (757) 787-5700 for additional information.

15. Pollution Prevention. DEQ advocates that principles of pollution prevention be used in all construction projects as well as in facility operations. Effective siting, planning, and on-site Best Management Practices (BMPs) will help to ensure that environmental impacts are minimized. However, pollution prevention techniques also include decisions related to construction materials, design, and operational procedures that will facilitate the reduction of wastes at the source.

15(a) Recommendations. We have several pollution prevention recommendations that may be helpful in the construction of this project and in the operation of the facility:

- Consider development of an effective Environmental Management System (EMS). An effective EMS will ensure that the facility is committed to minimizing its environmental impacts, setting environmental goals, and achieving improvements in its environmental performance. DEQ offers EMS development assistance and it recognizes facilities with effective Environmental Management Systems through its Virginia Environmental Excellence Program.
- Consider environmental attributes when purchasing materials. For example, the extent of recycled material content, toxicity level, and amount of packaging should be considered and can be specified in purchasing contracts.
- Consider contractors' commitment to the environment (such as an EMS) when choosing contractors. Specifications regarding raw materials and construction practices can be included in contract documents and requests for proposals.
- Choose sustainable materials and practices for infrastructure construction and design. These could include asphalt and concrete containing recycled materials, and integrated pest management in landscaping, among other things.
- Integrate pollution prevention techniques into the facility maintenance and operation, to include the following: inventory control (record-keeping and centralized storage for hazardous materials), product substitution (use of non-toxic cleaners), and source reduction (fixing leaks, energy-efficient HVAC and

Mr. Joshua A. Bundick
Reconfiguration of the Wallops Flight Facility Main Entrance

equipment). Maintenance facilities should be designed with sufficient and suitable space to allow for effective inventory control and preventative maintenance.

DEQ's Office of Pollution Prevention provides information and technical assistance relating to pollution prevention techniques and EMS. For more information, contact DEQ's Office of Pollution Prevention, Sharon Baxter at (804) 698-4344.

16. Energy Conservation. The proposed structures should be planned and designed to comply with state and federal guidelines and industry standards for energy conservation and efficiency. For example, the energy efficiency of the facility can be enhanced by maximizing the use of the following:

- thermally-efficient building shell components (roof, wall, floor, windows, and insulation);
- facility siting and orientation with consideration towards natural lighting and solar loads
- high efficiency heating, ventilation, air conditioning systems;
- high efficiency lighting systems and daylighting techniques; and
- energy-efficient office and data processing equipment.

Please contact the Department of Mines, Minerals, and Energy, David Spears at (434) 951-6350 for additional information.

17. Water Conservation. The following recommendations will result in reduced water use associated with the operation of the facility.

- Grounds should be landscaped with hardy native plant species to conserve water as well as lessen the need to use fertilizers and pesticides.
- Convert turf to low water-use landscaping such as drought resistant grass, plants, shrubs and trees.
- Low-flow toilets should be installed in new facilities. Otherwise, offset older toilets with a plastic jug of pebbles and water to minimize flushing.
- Consider installing low flow restrictors and aerators to faucets.
- Improve irrigation practices by:
 - upgrading sprinkler clock; water at night, if possible, to reduce evapotranspiration (lawns need only 1 inch of water per week, and do not need to be watered daily; overwatering causes 85% of turf problems);
 - installing a rain shutoff device; and
 - collecting rainwater with a rain bucket or cistern system with drip lines.
- Check for and repair leaks (toilets and faucets) during regular routine maintenance activities.

FEDERAL CONSISTENCY UNDER THE COASTAL ZONE MANAGEMENT ACT

Pursuant to the Coastal Zone Management Act of 1972, as amended, federal activities located inside or outside of Virginia's designated coastal management area that can have reasonably foreseeable effects on coastal resources or coastal uses must, to the maximum extent practicable, be implemented in a manner consistent with the Virginia Coastal Zone Management Program (VCP). The VCP consists of a network of programs administered by several agencies. The DEQ coordinates the review of federal consistency determinations with agencies administering the Enforceable and Advisory Policies of the VCP. A federal consistency determination was submitted with the EA that includes an analysis of the enforceable policies of the VCP.

Federal Consistency Public Participation

In accordance with 15 CFR § 930.2, public notice of the proposed action was published on DEQ's web site from March 11, 2011 to April 8, 2011. No public comments were received in response to the notice.

Federal Consistency Concurrence

Based on our review of NASA's consistency determination, and the comments and recommendations submitted by agencies administering the enforceable policies of the VCP, DEQ concurs that this proposal is consistent with the VCP. However, other state approvals which may apply to this project are not included in this concurrence. Therefore, NASA must ensure that this project is constructed and operated in accordance with all applicable federal, state, and local laws and regulations. We encourage NASA to consider the advisory policies of the VCP as well (see Attachment 2).

REGULATORY AND COORDINATION NEEDS

1. Erosion and Sediment Control and Stormwater Management.

1(a) Erosion and Sediment Control and Stormwater Management. NASA must ensure that it is in compliance with *Virginia's Erosion and Sediment Control Law* (Virginia Code 10.1-567) and *Regulations* (4 VAC 50-30-30 *et seq.*) and *Stormwater Management Law* (Virginia Code 10.1-603.5) and *Regulations* (4 VAC 3-20-210 *et seq.*). Activities that disturb 10,000 square feet or more of land would be regulated by VESCL&R and VSWML&R. NASA is encouraged to contact DCR's Suffolk Regional Office at (757) 925-2468, for assistance with developing or implementing an ESC plan to ensure project conformance.

Mr. Joshua A. Bundick
Reconfiguration of the Wallops Flight Facility Main Entrance

1(b) Virginia Stormwater Management Program General Permit for Stormwater Discharges from Construction Activities. For projects involving land-disturbing activities one acre or more, NASA is required to develop a project-specific stormwater pollution prevention plan and apply for registration coverage under the Virginia Stormwater Management Program General Permit for Discharges of Stormwater from Construction Activities. Specific questions regarding the Stormwater Management Program requirements should be directed to Holly Sepety, DCR, at (804) 225-2613.

3. Air Quality Regulations. This project may be subject to air regulations administered by the Department of Environmental Quality. The following sections of Virginia Administrative Code are applicable:

- 9 VAC 5-50-60 *et seq.* governing fugitive dust emissions; and
- 9 VAC 5-130 *et seq.* for open burning.

For additional information and coordination, contact DEQ-TRO, Jane Workman at (757) 518-2112. Also, contact the Accomack County for any local requirements on open burning.

4. Solid and Hazardous Wastes. All solid waste, hazardous waste, and hazardous materials must be characterized and managed in accordance with all applicable federal, state, and local environmental regulations. Some of the applicable state laws and regulations are:

- Virginia Waste Management Act (Code of Virginia Section 10.1-1400 *et seq.*);
- Virginia Hazardous Waste Management Regulations (VHWMR) (9 VAC 20-60);
- Virginia Solid Waste Management Regulations (VSWMR) (9 VAC 20-80); and
- Virginia Regulations for the Transportation of Hazardous Materials (9 VAC 20-110).

Applicable federal regulations are as follows:

- *Resource Conservation and Recovery Act* (RCRA), 42 U.S.C. Section 6901 *et seq.*, and the applicable regulations contained in Title 40 of the Code of Federal Regulations; and
- *U.S. Department of Transportation Rules for Transportation of Hazardous Materials*, 49 CFR Parts 107, 171.1-172.558.

For additional information concerning location and availability of suitable waste management facilities in the project area or if free product, discolored soils, or other evidence of contaminated soils are encountered, contact DEQ-TRO, Milt Johnston at (757) 518-2151.

4(a) Asbestos-Containing Material. It is the responsibility of the owner or operator of a demolition activity, prior to the commencement of the demolition, to thoroughly inspect the affected part of the facility where the operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material (ACM). Upon classification as friable or non-friable, all waste ACM shall be disposed of in accordance with the Virginia Solid Waste Management Regulations (9 VAC 20-80-640), and transported in accordance with the Virginia regulations governing Transportation of Hazardous Materials (9 VAC 20-110-10 *et seq.*). Contact the DEQ Division of Land Preservation and Restoration for additional information, (804) 698-4021, and the Department of Labor and Industry, Ronald L. Graham at (804) 371-0444.

4(b) Lead-Based Paint. If applicable, the proposed project must comply with the U.S. Department of Labor, Occupational Safety and Health Administration (OSHA) regulations, and with the Virginia Lead-Based Paint Activities Rules and Regulations. For additional information regarding these requirements contact the Department of Professional and Occupational Regulation, David Dick at (804) 367-8588.

4(c) Comprehensive Environmental Response Compensation and Liability Act. NASA should contact T.J. Meyer at (757) 824-1987 for information concerning Comprehensive Environmental Response, Compensation, and Liability Act obligations at the installation.

5. Storage Tanks. If evidence of a petroleum release is discovered during construction of this project, NASA must contact the DEQ Tidewater Regional Office, Lynne Smith at (757) 518-2055 or Gene Siudyla at (757) 518-2117.

The use of portable fuel AST(s) with a capacity of greater than 660 gallons, the tank(s) must be registered with DEQ using *AST Registration Form 7540-AST*. Tank registration may be accomplished by contacting Tom Madigan, DEQ Tidewater Regional Office, at (757) 518-2115 or by e-mail at temadigan@deq.virginia.gov.

6. Protected Species. Contact the Center for Conservation Biology at (757) 221-2247 or visit its website at <http://ccb-wm.org/virginiaeagles/> to determine if any new bald eagle nests were detected in the project area during the 2010 surveys. Contact DGIF for further consultation should new nest be documented within 0.25 mile (1,320 feet) of the project area.

7. Water Supply. Coordinate with the water supply authority at NASA WFF concerning potential project impacts to the local water supply, particularly nearby groundwater wells.

Mr. Joshua A. Bundick
Reconfiguration of the Wallops Flight Facility Main Entrance

8. Transportation Impacts. NASA must coordinate with the VDOT Land Development program manager to ensure compliance with access management policies, traffic control practices and all applicable VDOT standards. Contact VDOT, Koustubh Jain at (757) 925-3686.

9. Historic and Archaeological Resources. NASA must continue to coordinate this project with the Department of Historic Resources in accordance with Section 106 of the *National Historic Preservation Act*, as amended, and its implementing regulation 36 CFR 800. For additional information and coordination, contact DHR, Roger Kirchen at (804) 367-2323, ext. 153.

Thank you for the opportunity to review the Draft Environmental Assessment and Federal Consistency Determination for the Reconfiguration of the Wallops Flight Facility Main Entrance in Accomack County. Detailed comments of reviewing agencies are attached for your review. Please contact me at (804) 698-4325 or John Fisher at (804) 698-4339 for clarification of these comments.

Sincerely,



Ellie Irons, Manager
Office of Environmental Impact Review

Enclosures

Ec: Cindy Keltner, DEQ-TRO
Richard Criqui, DEQ-DLPR
Kotur Narasimhan, DEQ-Air
Tony Watkinson, VMRC
Amy Ewing, DGIF
Robbie Rhur, DCR
Keith Tignor, VDACs
Todd Groh, VDF
Barry Matthews, VDH
Roger Kirchen, DHR
Chris Adkins, VDOT

Cc: Steven Minor, Accomack County
Paul Berge, Accomack-Northampton PDC

Attachment 2

Advisory Policies for Geographic Areas of Particular Concern

- a. Coastal Natural Resource Areas - These areas are vital to estuarine and marine ecosystems and/or are of great importance to areas immediately inland of the shoreline. Such areas receive special attention from the Commonwealth because of their conservation, recreational, ecological, and aesthetic values. These areas are worthy of special consideration in any planning or resources management process and include the following resources:
 - a) Wetlands
 - b) Aquatic Spawning, Nursery, and Feeding Grounds
 - c) Coastal Primary Sand Dunes
 - d) Barrier Islands
 - e) Significant Wildlife Habitat Areas
 - f) Public Recreation Areas
 - g) Sand and Gravel Resources
 - h) Underwater Historic Sites.

- b. Coastal Natural Hazard Areas - This policy covers areas vulnerable to continuing and severe erosion and areas susceptible to potential damage from wind, tidal, and storm related events including flooding. New buildings and other structures should be designed and sited to minimize the potential for property damage due to storms or shoreline erosion. The areas of concern are as follows:
 - i) Highly Erodible Areas
 - ii) Coastal High Hazard Areas, including flood plains.

- c. Waterfront Development Areas - These areas are vital to the Commonwealth because of the limited number of areas suitable for waterfront activities. The areas of concern are as follows:
 - i) Commercial Ports
 - ii) Commercial Fishing Piers
 - iii) Community Waterfronts

Although the management of such areas is the responsibility of local government and some regional authorities, designation of these areas as Waterfront Development Areas of Particular Concern (APC) under the VCRMP is encouraged. Designation will allow the use of federal CZMA funds to be used to assist planning for such areas and the implementation of such plans. The VCRMP recognizes two broad classes of priority uses for waterfront development APC:

- i) water access dependent activities;
- ii) activities significantly enhanced by the waterfront location and complementary to other existing and/or planned activities in a given waterfront area.

Advisory Policies for Shorefront Access Planning and Protection

- a. Virginia Public Beaches - Approximately 25 miles of public beaches are located in the cities, counties, and towns of Virginia exclusive of public beaches on state and federal land. These public shoreline areas will be maintained to allow public access to recreational resources.
- b. Virginia Outdoors Plan - Planning for coastal access is provided by the Department of Conservation and Recreation in cooperation with other state and local government agencies. The Virginia Outdoors Plan (VOP), which is published by the Department, identifies recreational facilities in the Commonwealth that provide recreational access. The VOP also serves to identify future needs of the Commonwealth in relation to the provision of recreational opportunities and shoreline access. Prior to initiating any project, consideration should be given to the proximity of the project site to recreational resources identified in the VOP.
- c. Parks, Natural Areas, and Wildlife Management Areas - Parks, Wildlife Management Areas, and Natural Areas are provided for the recreational pleasure of the citizens of the Commonwealth and the nation by local, state, and federal agencies. The recreational values of these areas should be protected and maintained.
- d. Waterfront Recreational Land Acquisition - It is the policy of the Commonwealth to protect areas, properties, lands, or any estate or interest therein, of scenic beauty, recreational utility, historical interest, or unusual features which may be acquired, preserved, and maintained for the citizens of the Commonwealth.
- e. Waterfront Recreational Facilities - This policy applies to the provision of boat ramps, public landings, and bridges which provide water access to the citizens of the Commonwealth. These facilities shall be designed, constructed, and maintained to provide points of water access when and where practicable.
- f. Waterfront Historic Properties - The Commonwealth has a long history of settlement and development, and much of that history has involved both shorelines and near-shore areas. The protection and preservation of historic shorefront properties is primarily the responsibility of the Department of Historic Resources. Buildings, structures, and sites of historical, architectural, and/or archaeological interest are significant resources for the citizens of the Commonwealth. It is the policy of the Commonwealth and the VCRMP to enhance the protection of buildings, structures, and sites of historical, architectural, and archaeological significance from damage or destruction when practicable.



DEPARTMENT OF ENVIRONMENTAL QUALITY
TIDEWATER REGIONAL OFFICE
ENVIRONMENTAL IMPACT REVIEW COMMENTS

RECEIVED

APR 12 2011

DEQ-Office of Environmental
Impact Review

April 12, 2011

PROJECT NUMBER: 11-037F

PROJECT TITLE: Reconfiguration of the Wallops Flight Facility Main Entrance

As Requested, TRO staff has reviewed the supplied information and has the following comments:

Petroleum Storage Tank Cleanups:

There have been no petroleum releases reported at or adjacent to the proposed project at the Wallops Flight Facility. If evidence of a petroleum release is discovered during construction of this project, it must be reported to DEQ. Contact Ms. Lynne Smith at (757) 518-2055 or Mr. Gene Siudyla at (757) 518-2117. Petroleum contaminated soils or ground water generated during construction of this project must be properly characterized and disposed of properly.

Petroleum Storage Tank Compliance/Inspections:

The removal, relocation or closure of any regulated petroleum storage tanks - aboveground storage tank (AST); underground storage tank (UST) must be conducted in accordance with the requirements of the Virginia Tank Regulations 9 VAC 25-91-10 et seq (AST) and / or 9 VAC 25-580-10 et seq (UST). Documentation and / or questions should be submitted to Tom Madigan - DEQ Tidewater Regional Office - 5636 Southern Blvd., Virginia Beach, VA 23462. Phone (757) 518-2115. Installation and operation of any regulated petroleum storage tank(s) either AST or UST must also be conducted in accordance with the Virginia Regulations 9 VAC 25-91-10 et seq and / or 9 VAC 25-580-10 et seq. Please contact Tom Madigan (757) 518-2115 for additional details.

Virginia Water Protection Permit Program (VWPP):

No Comment

Air Permit Program :

No comments.

Water Permit Program :

VPDES Permit Section - No Comment -No permits under the section's purview required by the proposed project

Ground Water - No comments.



DEPARTMENT OF ENVIRONMENTAL QUALITY
TIDEWATER REGIONAL OFFICE
ENVIRONMENTAL IMPACT REVIEW COMMENTS

April 12, 2011

PROJECT NUMBER: 11-037F

PROJECT TITLE: Reconfiguration of the Wallops Flight Facility Main Entrance

Waste Permit Program :

All construction and demolition debris, including excess soil, must be characterized in accordance with the Virginia Hazardous Waste Management Regulations prior to disposal at an appropriate off site facility

The staff from the Tidewater Regional Office thanks you for the opportunity to provide comments.

Sincerely,

Cindy Keltner
Environmental Specialist II
5636 Southern Blvd.
VA Beach, VA 23462
(757) 518-2167
Cindy.Keltner@deq.virginia.gov



COMMONWEALTH of VIRGINIA

L. Preston Bryant, Jr.
Secretary of Natural Resources

Marine Resources Commission
2600 Washington Avenue
Third Floor
Newport News, Virginia 23607
May 13, 2009

Steven G. Bowman
Commissioner

Mr. John E. Fisher
c/o Department. Of Environmental Quality
Office of the Environmental Impact Review
629 East Main Street, Sixth Floor
Richmond, Virginia 23219

Re: 11-037
"Reconfiguration of Wallops Flight Facility Main Entrance"

Dear Mr. Fisher:

You have inquired regarding the Environmental Assessment (EA) proposed reconfiguration of the main entrance to the National Aeronautics and Space Administration (NASA) Goddard Space Flight Center's (GSFC) Wallops Flight Facility (WFF), located in Accomack County on the Eastern Shore of Virginia.

The proposal includes construction of a badge office and visitor parking area, security personnel parking area, truck inspection area, guard house and canopy, a traffic roundabout, and Shipping and Receiving Facility.

The Marine Resources Commission requires a permit for any activities that encroach upon or over, or take use of materials from the beds of the bays, ocean, rivers and streams, or creeks which are the property of the Commonwealth.

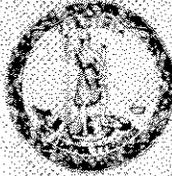
Based upon my review of the EA for the Reconfiguration of Main Entrance, dated March 2011, it would appear that your project will not be in the Commission's jurisdiction, therefore, no authorization would be required from the Marine Resources Commission.

If I may be of further assistance, please do not hesitate to contact me at (757) 414-0710.

Sincerely,

George H. Badger, III
Environmental Engineer

An Agency of the Natural Resources Secretariat
Web Address: www.mrc.virginia.gov



Douglas W. Domenech
Secretary of Natural Resources

David A. Johnson
Director

COMMONWEALTH of VIRGINIA
DEPARTMENT OF CONSERVATION AND RECREATION

203 Governor Street
Richmond, Virginia 23219-2010
(804) 786-1712

RECEIVED
APR 05 2011
DEQ-Office of Environmental
Impact Review

MEMORANDUM

DATE: April 5, 2011
TO: John Fisher, DEQ
FROM: Roberta Rhur, DCR, Environmental Impact Review Coordinator
Subject: DEQ 11-037F, Wallops Island Facility Main Entrance, Accomack CO

Division of Natural Heritage

The Department of Conservation and Recreation's Division of Natural Heritage (DCR) has searched its Biotics Data System for occurrences of natural heritage resources from the area outlined on the submitted map. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.

Biotics documents the presence of natural heritage resources in the project area. However, due to the scope of the activity and the distance to the resources, we do not anticipate that this project will adversely impact these natural heritage resources.

Our files do not indicate the presence of any State Natural Area Preserves under DCR's jurisdiction in the project vicinity.

Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the Virginia Department of Conservation and Recreation (DCR), DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species. The current activity will not affect any documented state-listed plants or insects.

New and updated information is continually added to Biotics. Please contact DCR for an update on this natural heritage information if a significant amount of time passes before it is utilized.

The Virginia Department of Game and Inland Fisheries maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters that may contain information not documented in this letter. Their database may be accessed from <http://vafwis.org/fwis/> or contact Shirl Dressler at (804) 367-6913.

Division of Soil and Water Conservation

The Applicant and their authorized agents conducting regulated land disturbing activities on private and public lands in the state must comply with the Virginia Erosion and Sediment Control Law and Regulations (VESCL&R), Virginia Stormwater Management Law and Regulations including coverage under the general permit for stormwater discharge from construction activities, and other applicable federal nonpoint source pollution mandates (e.g. Clean Water Act-Section 313, Federal Consistency under the Coastal Zone Management Act). Clearing and grading activities, installation of staging areas, parking lots, roads, buildings, utilities, borrow areas, soil stockpiles, and related land-disturbance activities that result in the land-disturbance of equal to or greater than 10,000 square feet would be regulated by VESCL&R. Accordingly, the Applicant must prepare and implement erosion and sediment control (ESC) plan to ensure compliance with state law and regulations. The ESC plan is submitted to the DCR Regional Office that serves the area where the project is located for review for compliance. The Applicant is ultimately responsible for achieving project compliance through oversight of on site contractors, regular field inspection, prompt action against non-compliant sites, and other mechanisms consistent with agency policy. [Reference: VESCL §10.1-567;].

The operator or owner of construction activities involving land disturbing activities equal to or greater than one acre are required to register for coverage under the General Permit for Discharges of Stormwater from Construction Activities and develop a project specific stormwater pollution prevention plan (SWPPP). Construction activities requiring registration also includes the land-disturbance of less than one acre of total land area that is part of a larger common plan of development or sale if the larger common plan of development will ultimately disturb equal to or greater than one acre. The SWPPP must be prepared prior to submission of the registration statement for coverage under the general permit and the SWPPP must address water quality and quantity in accordance with the Virginia Stormwater Management Program (VSMP) Permit Regulations. General information and registration forms for the General Permit are available on DCR's website at

http://www.dcr.virginia.gov/soil_and_water/index.shtml

[Reference: Virginia Stormwater Management Law Act §10.1-603.1 et seq.; VSMP Permit Regulations §4VAC-50 et seq.]

The remaining DCR divisions have no comments regarding the scope of this project. Thank you for the opportunity to comment.



RECEIVED

MAR 29 2011

DEQ-Office of Environmental
Impact Review

MEMORANDUM

TO: John Fisher, Environmental Program Planner

FROM: Paul Kohler, Waste Division Environmental Review Coordinator

DATE: March 29, 2011

COPIES: Sanjay Thirunagari, Waste Division Environmental Review Manager; file

SUBJECT: Environmental Impact Report: Reconfiguration of the Wallops Flight Facility Main Entrance; 11-037F

The Waste Division has completed its review of the Environmental Impact report for the Reconfiguration of the Wallops Flight Facility Main Entrance project in Wallops Island, Virginia. We have the following comments concerning the waste issues associated with this project:

Both solid and hazardous waste issues were addressed in the report. The report did include a search of waste-related data bases. A GIS database search did not reveal any waste sites within a half mile radius that would impact or be impacted by the subject site. The Waste Division staff performed a cursory review of its data files and determined that there are several hazardous and formerly used defense sites (FUDS) located within the same zip code, however their proximity to the subject site is unknown. These are as follows.

HW

NASA GSFC Wallops Flight Facility, VA8800010763 LQG (Active)
VA7800020888 LQG (Active)
VA7800020888 TSD (Active)

FUDS

C03VA0301, VA9799F1697, WALLOPS ISL

The following websites may prove helpful in locating additional information for these identification numbers: http://www.epa.gov/enviro/html/rcris/rcris_query_java.html. Paul Herman of DEQ's Federal Facilities Program has been contacted for his review of this determination and responded as follows.

Paul,

DEQ's Federal Facilities Restoration Program recommends contacting Mr. T.J. Meyer of the installation at (757-824-1987) for information concerning Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) obligations at this installation. Please advise Mr. Meyer prior to initiating any land, sediment, or groundwater disturbing activities associated with the main entrance reconfiguration project.

Paul E. Herman, P.E.
Remediation Project Manager
Federal Facilities Program
Virginia Department of Environmental Quality
629 East Main Street
Richmond, Virginia 23219
Phone: (804) 698-4464
email: peherman@deq.virginia.gov

Any soil that is suspected of contamination or wastes that are generated during construction-related activities must be tested and disposed of in accordance with applicable Federal, State, and local laws and regulations. Some of the applicable state laws and regulations are: Virginia Waste Management Act, Code of Virginia Section 10.1-1400 *et seq.*; Virginia Hazardous Waste Management Regulations (VHWMR) (9VAC 20-60); Virginia Solid Waste Management Regulations (VSWMR) (9VAC 20-80); Virginia Regulations for the Transportation of Hazardous Materials (9VAC 20-110). Some of the applicable Federal laws and regulations are: the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Section 6901 *et seq.*, and the applicable regulations contained in Title 40 of the Code of Federal Regulations; and the U.S. Department of Transportation Rules for Transportation of Hazardous materials, 49 CFR Part 107.

Also, all structures being demolished/renovated/ removed should be checked for asbestos-containing materials (ACM) and lead-based paint prior to demolition. If ACM or LBP are found, in addition to the federal waste-related regulations mentioned above, State regulations 9VAC 20-80-640 for ACM and 9VAC 20-60-261 for LBP must be followed.

Please note that DEQ encourages all construction projects and facilities to implement pollution prevention principles, including the reduction, reuse, and recycling of all solid wastes generated. All generation of hazardous wastes should be minimized and handled appropriately.

If you have any questions or need further information, please contact Paul Kohler at (804) 698-4208.

Fisher, John (DEQ)

From: Ewing, Amy (DGIF)
Sent: Tuesday, April 05, 2011 4:07 PM
To: Fisher, John (DEQ)
Subject: ESSLog# 31742_11-037F_reconfiguration of main entrance_Wallops Flight Facility

We have reviewed the subject project that proposes a number of alternatives for reconfiguring the main entrance to the Main Base at Wallops Flight Facility in Accomack County, VA.

State Threatened bald eagles have been documented from the project area. This project site falls outside the management zone for the nest we currently document. Therefore, we do not anticipate this project to result in adverse impacts upon the eagles using this nest. However, it is possible that new bald eagle nests have been constructed in or near the project area during the 2010 nesting season and that such nests may be adversely impacted by the project activities. To ensure protection of this listed species, please contact the Center for Conservation Biology at 757-221-2247 or visiting their website at <http://ccb-wm.org/virginiaeagles/> to determine if any new bald eagle nests were detected during the 2010 surveys. We recommend that you search the county in which your project is located as well as adjacent counties to ensure capture of any nests that may have been attributed to a neighboring county. If a new nest was documented within 0.25 mile (1,320 feet) of the project area, please contact us to facilitate further consultation regarding the new nest(s).

To minimize overall impacts to wildlife and our natural resources, we offer the following comments about development activities: We recommend that the applicant avoid and minimize impacts to undisturbed forest, wetlands, and streams to the fullest extent practicable. We recommend maintaining undisturbed naturally vegetated buffers of at least 100 feet in width around all on-site wetlands and on both sides of all perennial and intermittent streams.

We recommend that the stormwater controls for this project be designed to replicate and maintain the hydrographic condition of the site prior to the change in landscape. This should include, but not be limited to, utilizing bioretention areas, and minimizing the use of curb and gutter in favor of grassed swales. Bioretention areas (also called rain gardens) and grass swales are components of Low Impact Development (LID). They are designed to capture stormwater runoff as close to the source as possible and allow it to slowly infiltrate into the surrounding soil. They benefit natural resources by filtering pollutants and decreasing downstream runoff volumes.

We recommend that all tree removal and ground clearing adhere to a time of year restriction protective of resident and migratory songbird nesting from March 15 through August 15 of any year.

We recommend adherence to erosion and sediment controls during ground disturbance.

Assuming adherence to erosion and sediment controls during ground disturbance, we find the project consistent with the Fisheries Management Section of the CZMA.

Thanks, Amy

Amy Ewing
Environmental Services Biologist
VA Dept. of Game and Inland Fisheries
4010 W. Broad Street
Richmond, VA 23230
804-367-2211
amy.ewing@dgif.virginia.gov

Fisher, John (DEQ)

From: Groh, Todd (DOF)
Sent: Friday, March 25, 2011 2:21 PM
To: Fisher, John (DEQ)
Subject: Reconfiguration of the Wallops Flight Facility Main Entrance, DEQ #11-037F

John,

In reference to the Reconfiguration of the Wallops Flight Facility Main Entrance, DEQ #11-037F, below are the Department's comments.

The Department of Forestry finds no significant impact to the forest resources of the Commonwealth for this project. However, appropriate measures should be taken to protect tree adjacent to the building sites that are not slated to be removed.

Where ever feasible, existing groupings and/or clusters of trees and natural vegetation should remain on the site to provide esthetic and environmental benefits, as well as reducing future open space maintenance costs.

Trees not slated for removal can be protected from the effects of construction activities associated with future construction. These trees should be marked and fenced at least to the drip line or the end of the root system, whichever extends farther from the stem. Marking should be done with highly visible ribbon so that equipment operators see the protected areas easily.

Parking and stacking of heavy equipment and construction materials near trees can damage root systems by compacting the soil. Soil compaction, from weight or vibration, affects root growth, water and nutrient uptake, and gas exchange. The protection measures suggested above should be used for parking and stacking as well as for moving of equipment and materials. If parking and stacking are unavoidable, the contractors should use temporary crossing bridges or mats to minimize soil compaction and mechanical injury to plants.

Any stock piling of soil should take place away from trees. Piling soil at a tree stem can kill the root system of the tree. Soil stockpiles should be covered, as well, to prevent soil erosion and fugitive dust.

Please let me know if you have any questions.

Todd A. Groh, Assistant Director
Forest Resource Management Division
Virginia Department of Forestry
900 Natural Resources Drive, Suite 800
Charlottesville, VA 22903
Phone: 434-220-9044
Mobile: 434-981-8882
Fax: 434-296-2369

Fisher, John (DEQ)

From: Forsgren, Diedre (VDH)
Sent: Thursday, March 31, 2011 3:59 PM
To: Fisher, John (DEQ)
Cc: Matthews, Barry (VDH)
Subject: (11-037F) EA/CD: Reconfiguration of the Wallops Flight Facility Main Entrance

DEQ Project #: 11-037F
Name: Reconfiguration of the Wallops Flight Facility Main Entrance
Sponsor: NASA
Location: Accomack County

VDH – Office of Drinking Water has reviewed DEQ Project Number 11-037F. Below are our comments as they relate to proximity to **public drinking water** sources (groundwater wells, springs and surface water intakes). Potential impacts to public water distribution systems or sanitary sewage collection systems must be verified by the local utility.

Five groundwater wells are within an approximately 2114 foot radius of the project site. These wells are owned and operated by Wallops Flight Center.

No surface water intakes are located within a 5 mile radius of the project site.

Project does not fall within Zone 1 (up to 5 miles into the watershed) or Zone 2 (greater than 5 miles into the watershed) of any public surface water sources.

There are potential impacts to public drinking water sources due to this project.

Best Management Practices should be employed on the project site including Erosion & Sedimentation during construction.

Field locate wells, and mark to ensure protection of wellheads during construction.

There are potential impact to public drinking water sources if controls are not implemented.

Diedre Forsgren

Office Services Specialist
VIRGINIA DEPARTMENT OF HEALTH
Office of Drinking Water, Room 622-A
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APR 03 2011

DEQ-Office of Environmental
Impact Review



COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION
1700 North Main Street
SUFFOLK, VIRGINIA 23434

Gregory Whirley,
COMMISSIONER

April 6, 2011

MEMORANDUM

To: Christopher D. Adkins, Environmental Program Planner

From: Koustubh Jain, P.E.
Transportation Planning Engineer

Subject: Review of Environmental Impact Report

Project: NASA – Reconfiguration of the Wallops Flight Facility Main Entrance

Location: Accomack County, Virginia

The Hampton Roads District Planning Section has reviewed the above referenced Environmental Evaluation for impacts to the existing and future transportation system. Our preliminary review indicates that all study intersections are operating at an acceptable level of service however detailed traffic analysis must be provided before project initiation.

This improvement/construction must be coordinated with the VDOT Land Development program manager to insure compliance with access management policies, traffic control practices and all applicable VDOT standards. We encourage the development of bicycle and pedestrian accommodations linking facilities to enhance access while increasing mobility around the multi-modal network.

Also, a land use permit will be required for any work in VDOT easements and right of way along with a traffic operation and safety analysis. Otherwise, this office has no objections to the proposed improvements.

If any additional information is required notify Koustubh Jain at 757-925-3686 or by e-mail koustubh.jain@vdot.virginia.gov.

kj

Cc: Eric Stringfield, Land Use Director

Fisher, John (DEQ)

From: Kirchen, Roger (DHR)
Sent: Monday, April 04, 2011 10:45 AM
To: Fisher, John (DEQ)
Subject: Reconfiguration of the Wallops Flight Facility Main Entrance (DEQ #11-037F; DHR File No. 2011-0445)

NASA has initiated direct consultation with DHR regarding the potential impacts of this project on historic resources and we request that they continue to consult directly with DHR pursuant to Section 106 of the National Historic Preservation Act (as amended) and its implementing regulations codified at 36 CFR Part 800.

Roger

*Roger W. Kirchen, Archaeologist
Office of Review and Compliance
Division of Resource Services and Review
Department of Historic Resources
2801 Kensington Avenue
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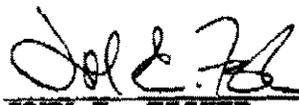
If you cannot meet the deadline, please notify JOHN FISHER at 804/698-4339 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

REVIEW INSTRUCTIONS:

- A. Please review the document carefully. If the proposal has been reviewed earlier (i.e. if the document is a federal Final EIS or a state supplement), please consider whether your earlier comments have been adequately addressed.
- B. Prepare your agency's comments in a form which would be acceptable for responding directly to a project proponent agency.
- C. Use your agency stationery or the space below for your comments. **IF YOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.**

Please return your comments to:

MR. JOHN E. FISHER
 DEPARTMENT OF ENVIRONMENTAL QUALITY
 OFFICE OF ENVIRONMENTAL IMPACT REVIEW
 629 EAST MAIN STREET, SIXTH FLOOR
 RICHMOND, VA 23219
 FAX #804/698-4319
 John.Fisher@deq.virginia.gov



 JOHN E. FISHER
 ENVIRONMENTAL PROGRAM PLANNER

COMMENTS

None.

(signed)  (date) April 7 2011
 (title) County Administrator
 (agency) Accomack County

NASA RESPONSE TO COMMENTS MATRIX

Appendix B

**Responses to comments received on the Draft Environmental Assessment (DEA)
Reconfiguration of Wallops Flight Facility Main Entrance**

Comment No.	Comment or Recommended Change	NASA Response	Document Revision
Comments from Dr. and Mrs. Joseph Marshall, property owners on Atlantic Road			
1	Why doesn't that statement apply to the alternative site especially considering all the other less congested sites already existing around the main gate especially along Mill Dam Road?	The statement is referencing the increased congestion at the main entrance. Currently, congestion is not an issue at the Alternative One site. Alternative site locations were not considered along Mill Dam Road as this is non-NASA property.	Added Section 2.3.2 to discuss consideration of alternative site locations. Figure 2-3 added to illustrate unavailable and non-NASA property.
2	And why is the safety of the civilian residents along Atlantic Road not a concern?	The resultant increased congestion at the main entrance is what has led to increased safety concerns for the employees/pedestrians in the area. The Alternatives are designed to separate trucks, vehicles and people; therefore decreasing congestion and increasing safety. The safety of civilian residents is the top priority. This is a preliminary study. As such the site would be designed to maximize safety and further details would be flushed out in the detailed final design.	Added language to Sections 3.9.2 and 3.10.2.
3	The alternative site has the same actual and potential problems especially with the proximity of Rt. 175 and summer traffic on the lone road to Chincoteague/Assateague.	The badge office parking lot would be sized appropriately to contain all trucks, visitor vehicles and security personnel vehicles anticipated to be on-site at any given time. Additionally a right-hand turn lane would be incorporated to help with traffic flow. No vehicles would be stopped on Atlantic	Added language to 3.10.2.

Appendix B

Comment No.	Comment or Recommended Change	NASA Response	Document Revision
		Road or Rt. 175 queuing to get into Alternative One site, therefore no impacts to traffic along Rt. 175 are expected.	
4	In 2010, there were 3000 vehicles/day at the main entrance. Access to the main gate is by Atlantic Road or Mill Dam Road. Both are two lane roads with Mill Dam having more of the traffic. If the alternative site is used, then Mill Dam travelers needing a pass or inspection must also use Atlantic Road. Doesn't this definitely increase congestion and use of Atlantic Road. Also see Fig 1-5 that shows 37,635 requests for temporary badges in 2010.	There would be no POV inspections performed at either alternative site location; these inspections would continue to be conducted at the main entrance. The chosen alternative site would be for badge office visitors and truck inspections only. Traffic would be expected to increase along Atlantic Road. The 3,000 vehicles/day referenced in Figure 1-4 (in the Draft EA) is over 95% permanently badged NASA employees that do not need to go to the badge office. It is estimated that an additional 74 vehicles would need to travel on Atlantic Road into the badge office. Please note that since the release of the Draft EA a subsequent traffic study has been performed, indicating that the majority of the traffic travels down Atlantic Road.	Added language to 3.10.2 to address additional traffic on Atlantic Road.
5	Fig 2-4 shows plenty of potential areas that do not directly impact current civilian housing in the area. Why were these areas not considered?	The “available” area seen in Figure 2-4 is non-NASA property. Please refer to Section 2.3.2 and Figure 2-3.	Added Section 2.3.2 to discuss consideration of alternative site locations. Figure 2-3 added to illustrate unavailable and non-NASA property.
6	The alternative site on Atlantic Road would back up traffic on Atlantic Road and nearby Rt. 175 causing more serious safety issues. Traffic could be backed up on Mill Dam Road a much greater distance without disrupting Rt. 175 traffic and sites do appear to be available.	Traffic from permanently badged employees awaiting badge check at the guardhouse, (which is approximately 95%) accounts for the majority of the traffic backup during a delay. The badge check location would not be changed under any alternative; therefore delayed openings would not cause a traffic backup onto Rt. 175. Please refer to	No change required.

Appendix B

Comment No.	Comment or Recommended Change	NASA Response	Document Revision
		Sections 3.10.2 and 2.3.2.	
7	Having the badges issued and truck inspections done at the alternative site {approximately 0.6 miles from the main gate} is not an INCREASED security risk? At the moment, and under the preferred site plans, these operations are under a higher security situation.	Under all alternatives, truck inspections would occur based on security procedures designed to deal with secure operational protocol; the specifics of which cannot be discussed.	Clarification has been added to Section 2.4.1.2.
8	The alternative site may lessen safety concerns for WFF personnel but it increases safety concerns for non-WFF individuals. I don't appreciate the implied message. The alternative site is only 0.6 miles from the main gate but how close is it to Rt. 175 and why is this distance not even discussed?	Safety is the driver for this project. NASA would not sacrifice the safety of the public in favor of its employees. This alternative would be designed and implemented with safety of the public as a top priority. The entrance to Alternative One would be located approximately 0.1 miles from Route 175.	Distance information added to Section 2.5.
9	Fig 2-12: Civilian housing refers to the residential houses on the other side of Atlantic Road. I question the 300 feet distance. Really! One football field distance would separate the nearest house on Atlantic Road from the facility. The houses along Atlantic Road are not 300 feet from the NASA fence and that is where the vehicles have to enter. 150 feet would be more accurate. Yes the impacts would be moderate at best and long term for sure. What happened to the vehicle inspection area?	The distance presented was to the badge office building, not to the entrance of Alternative One. Please refer to the "NASA Response" column for Comment No.4 regarding the location of POV inspections.	Added language to Section 3.1.1.2 to clarify the distance.
10	Paragraph 2 acknowledges that traffic noise would increase in the residential area.	Comment noted.	No change required.
11	Keep in mind that the dB scale is a log scale so what seems to be small scale differences	Please note that the "Possible Effects on Humans" column header on Table 3-10 contains a	No change required.

Appendix B

Comment No.	Comment or Recommended Change	NASA Response	Document Revision
	can actually be large differences. Table 3-10, p 3-19 shows possible speech interference and sleep interference at 56-61 dBA. This does not take into account the extra noise generated by trucks in the lower gears as they leave the facility. Page 3-22 puts the sound level at 64-67 dBA at times and that approaches the 70 dBA level considered harmful to humans.	superscripted “a” denoting “Both the subjective evaluations and the physiological responses are continuums without true threshold boundaries. Consequently, there are overlaps among categories of response that depend on the sensitivity of the noise receivers. Additionally, 64-67 dBA is consistent with residential land uses (Category B) per Table 3-11. It should also be noted that these noise levels were measured at the current main entrance to WFF during peak hours and accounted for all traffic, including trucks (in low gear), visitors, and permanently badged employees. Please note that this level of activity would not occur at the Alternative One site, which would be intended for badge issuance and truck inspection only.	
12	This statement is apparently made without considering just how many Mill Dam users need temporary badges.	Based on the most recent numbers, approximately 105 temporary badges are issued per business day. Of this total, 42 vehicles currently utilize Mill Dam Road, with the potential of 32 on base escorts, for a total of approximately 74 additional vehicles traveling down Atlantic Road over the course of a business day.	Additional information has been added to Section 3.10.1
Comments (via phone conversation) by Mary Gibson, resident on Atlantic Road			
13	Concerned about construction on Atlantic Road. Diminish quality of life for residences and military families-talked to several homeowners.	With the exception of turn lanes, all construction would occur within WFF property boundaries. The Action Alternatives would not measurably change traffic patterns or quality of life for residences on either Mill Dam or Atlantic Rd. Comment noted for Alternative One.	No change required.
14	Ocean Deli and Royal Farms intersection, from May to October, more potential for	Please refer to responses to Comments No. 3, 4, and 6.	No change required.

Appendix B

Comment No.	Comment or Recommended Change	NASA Response	Document Revision
	accidents.		
15	(Alternative One) would interfere with bicycling and jogging, high speed (60-70 mph) dangerous, increased trash and litter, Alternative one would be a “real negative.”	The speed limit along Atlantic road is 45 mph. The location of Alternative One would actually reduce the speed of traffic. Additional traffic that would be visiting the badge office would be making a right-hand turn less than one-tenth of a mile after turning onto Atlantic Road.	No change required.
16	Please preserve as many trees as possible.	Comment noted. It is WFF’s intention to preserve as many trees as possible. Please refer to Section 3.7.2.	No change required.
Comments from Environmental Protection Agency (EPA)			
17	Do conditions represented in the 2007 traffic analysis accurately represent existing or future conditions?	Although WFF conducted this study in 2007 for the Wallops Research Park analysis, the study provides useful information for project planning purposes. More recently, August 2010, WFF consulted again with VDOT who concluded that because no additional traffic would be generated, a full traffic impact analysis would not be required. Analyses requested by VDOT during the consultation have been incorporated into the EA, including updated traffic counts.	Additional information regarding WFF’s 2010 traffic study and consultation with VDOT has been added to Section 3.10.1 and 3.10.2.
18	The document states that the proposed traffic improvements will assist the flow of traffic, reduce crashes and injuries, and decrease time to exit the facility in the event of an emergency. Analysis or documentation supporting these statements is needed.	The current entry to Wallops includes a three-way (Y) intersection and single lane entrance and exit points. All badge checking, badge issuance, and truck/personal vehicle inspections occur within the same area. The separation of the truck inspection area from other vehicles and pedestrians would decrease congestion and the potential risk of accidents. The addition of a roundabout, as discussed in Section 2.4.1.2, would eliminate the need for traffic to merge, thereby increasing safety and efficiency for ingress and egress.	No change required.

Appendix B

Comment No.	Comment or Recommended Change	NASA Response	Document Revision
19	A RAC score of 3 was received due to security personnel having to cross traffic. How many security personnel are located at the guard station and how frequently do they need to cross lanes of traffic? Is there an existing cross walk for security personnel to use, or signage notifying vehicular traffic of pedestrians? What is the rate of incidence involving security or other pedestrians and motor vehicles?	The guard house is manned 24/7. At most times there are at least 2 guards at the guard station. The officers need to cross every time a car pulls up to the stop sign (leaving the badge office), for bathroom breaks, if they have to ask people to move vehicles, or to perform truck inspections. Each officer could easily cross traffic lanes anywhere from 25 to 100 times per shift. There is one crosswalk from the security personnel parking lot over to the badge office, however there is no signage. Fortunately there have been no injuries to date; however, there have been numerous close calls. The purpose of the Proposed Action is to proactively prevent an accident or injury from occurring.	Added lane crossing estimate to Section 1.3.2.1.
20	The project is proposed for the WFF main entrance. This implies that there are additional side entrances. Is a combination of upgrades to multiple entrance points feasible to meet the needs of this project? Is this the main entry point for employees of WFF?	Wallops Flight Facility is composed of three land masses (refer to Figure 1-1). The term “main entrance” is used to denote entry onto the Main Base as opposed to Wallops Mainland or Island. The Main Base entrance is considered the “main entrance” to WFF because all visitors and trucks must pass through this point regardless of end destination. Additional gates at the Main Base are emergency egress points only, therefore improving them would not be a feasible project alternative.	No change required.
21	A detailed traffic analysis of the project area is strongly recommended. Discuss the hours of operation at the gate, if security is present at all hours of the day, if WFF employees are entering the facility at all hours, if there are hours that limit visitor entries or	Please refer to “NASA Response” column for Comment No.17 regarding traffic analysis and VDOT consultation for this project. For peak hours of main entrance use please refer to Section 3.10.1. Currently no data exists regarding the amount of queuing at truck inspection lanes,	Additional questions have been addressed under section 1.2.1.2.

Appendix B

Comment No.	Comment or Recommended Change	NASA Response	Document Revision
	deliveries, if peak hours of main entrance use have been identified, and the amount queuing at truck inspections lanes, entry and exit points.	entry and exit points as this varies daily and is based on several factors.	
22	A component of the project would involve locating a new shipping and receiving building outside of the WFF fence. How would this location reduce security risks? How does this component of the proposed project related to the purpose and need of increased personnel safety?	Please refer to sections 1.3.2.7 and 2.4.1.2 for a discussion on how relocating the shipping and receiving facility would reduce security risks and increase personnel safety. Relocating trucks away from the main entrance is in itself an increase in safety.	No change required.
23	Figure 1-2 appears to be missing from the document. Please provide a figure of the existing conditions at the main entrance.	Figure 1-2 did not transfer properly when formatting document.	Figure 1-2 reattached.
24	What is the expected future growth or increase in usage of the main entrance for the projected future?	Based on a traffic engineering estimate future growth is expected to be 5% per year.	Language added to Section 3.10.1.
25	Will the reconfiguration of the entrance accommodate this growth in the 5 or 10 year future? How will proposed traffic changes accommodate future growth? What is the design year for the project?	The reconfiguration would accommodate growth and allow for the separation of trucks from other vehicles, thereby eliminating many unsafe conditions that exist at the front gate. The design calls for additional parking for visitors and twice as many "marked" truck inspection lanes. The project's design life is 20 years, with the proposed design year being 2011.	No change required.
26	How frequently do visitors go to the badge office and travel directly to Wallops Island? Are any visitor badges given at the entrance to this facility? Does the main entrance badge office handle all visitors for the whole facility?	The badge office issues 600 to 1,000 temporary badges per week. Approximately 80% of the visitors travel directly to Wallops Island from the badge office. The Island Gate cannot issue visitor badges. All visitors must first go to the badge office located at the main entrance to be issued a temporary badge prior to accessing any area on	Additional language added to sections 1.2.1 and 1.2.1.1.

Appendix B

Comment No.	Comment or Recommended Change	NASA Response	Document Revision
		WFF.	
27	What is the average wait time at the badge office? Would extra staff help alleviate this problem? How often is the maximum capacity of the badge office exceeded?	The average wait time at the badge office depends on current activities; special projects, special events, group tours, new construction, etc. Extra staff may help alleviate the wait time issue; however, the main issue is the parking lot congestion. Based on observation, the maximum capacity of the badge office is estimated to be exceeded approximately 35% of the time or 14 hours out of a 40 hour work week.	Additional text added to 1.3.2.3
28	Section 2.3 Alternatives Screening Process states that several design concepts were eliminated because these designs may have required the need to hire additional staff to oversee a separate truck inspection area. It is not clear why this factor is limiting or how it relates to purpose and need of the proposed project. It appears that other components of preferred alternative would necessitate the need for additional employees. Increasing the amount of staff at existing facilities may be a viable alternative that was not considered in the document.	The hiring of additional staff would not alleviate visitor and/or vehicle congestion. The current and future federal budget makes hiring additional personnel highly improbable. This project would be planned in a phased approach, allowing time for the redistribution of existing personnel, thus eliminating the need to hire additional staff. Hiring additional staff would not physically separate passenger vehicles, trucks, and pedestrians, which is the primary objective of the project.	No change required.
29	Steps to improve existing structures or signage may be a viable alternative that was not considered in the document.	Improving existing structures or signage would not physically separate passenger vehicles, trucks, and pedestrians, which is the primary objective of the project. However, additional signage is a component of the Proposed Action.	Signage information has been added to sections 2.4.1.1, 2.4.2.1, and 2.5.1.
30	How much space is needed and proposed to accommodate truck inspection lanes? Discuss the current amount of queuing as	There are currently two existing queuing lanes for truck inspections. The amount of queuing depends on many factors; however, as many as six trucks	Language has been added to Section 2.4.1.1 regarding number and size

Appendix B

Comment No.	Comment or Recommended Change	NASA Response	Document Revision
	well as how the proposed action will affect queuing. Effects of the addition of how turn lanes affect the flow of traffic should also be included.	have been observed queuing for inspection. It should be noted the truck inspection lanes are currently located within the badge office parking lot and although it can physically hold these additional trucks; it leaves no room for vehicles requiring access to the badge office or merging into the main entrance. The Proposed Action would better accommodate truck queuing by providing four truck inspection lanes separated from the congestion of the badge office. According to USDOT, turn lanes beneficially impact the flow of traffic.	of truck inspection lanes.
31	Please include correspondences relating to traffic changes as an appendix to the DEA.	Correspondence (to VDOT/Accomack County) has been added as an appendix.	Appendix A (Agency Consultation) added to the document.
32	Discuss coordination efforts relating to public road improvements associated with the proposed action. Coordination correspondences relating to this project with other federal, state and local agencies, including consultation relating to cultural and historic resources should be included.	NASA sent postcards notifying all residences/property owners in the immediate vicinity of the proposed project locations regarding potential impacts. The draft EA was distributed to federal, state, tribal, and local agencies for review and comment.	Appendices A and B, containing agency and public coordination, have been added to the final document.
33	Under the preferred alternative unique cargo trucks delivering to Wallops Island would now be inspected at the Mainland security post. How will diverting these trucks away from the main entrance to WFF affect traffic? Discuss any additional upgrades that may be needed at the Mainland security post or Mainland truck inspection area.	Diverting trucks away from the main entrance would increase safety by helping decrease congestion; as the safety concerns created by truck and vehicle congestion at the main entrance are the driving force behind this project. No improvements are needed at the Mainland/Island gate to accommodate truck inspections, as this is the current practice for trucks requiring access to Island/Mainland facilities.	Clarification added to 2.4.1.2.
34	A more detailed Environmental Justice (EJ)	NASA sent postcards notifying all	No change required.

Appendix B

Comment No.	Comment or Recommended Change	NASA Response	Document Revision
	analysis is needed. EJ assessment should identify potential populations of concern, and conduct an assessment to determine if disproportionately high and/or disparate impacts occur or have the potential to adversely impact those populations. It is not clear if necessary level of study has been conducted to identify potential populations that may exist in the study area. Additional discussion regarding adverse impacts, including increased noise and traffic delays, should be included. Discuss what specific outreach and public involvement efforts have taken place for EJ communities related to this project.	residences/property owners in the immediate vicinity of the proposed project locations regarding potential impacts to provide them a chance to review/comment on the draft EA. The draft EA NOA was also published in two free local papers as well as the internet. NASA contacted EPA regarding this comment. EPA acknowledged that NASA used the best data publicly available and performed sufficient public outreach. EPA had no further suggestions regarding additional analysis.	
35	Section 3.5.1 for noise does not appear to describe existing noise conditions that may be encountered by visitors, employees and residences located near WFF. Including up to date noise information is important in order to determine the effects that the proposed project would have on noise. The baseline year used for noise was 1992. Based on the amount of growth and future expansion of WFF, an updated noise analysis and update of nearby noise receptors is encouraged.	WFF has conducted additional noise analysis based upon updated traffic volumes as of May 2011, with growth projected out twenty years.	Section 3.5 has been updated.
36	What are the predicted noise levels during construction and operation of the proposed alternatives? Has noise analysis included a projection of conditions with predicted WFF expansion and gate volume?	Please refer to Section 3.5.2. Regarding the effect of growth on noise levels, please see response to Comment No. 35.	Additional noise analysis and traffic information has been added to Sections 3.5.2 and 3.10.2.

Appendix B

Comment No.	Comment or Recommended Change	NASA Response	Document Revision
37	Cumulative impact analysis should include all past, present and reasonably foreseeable future actions. It is suggested that a secondary and cumulative effects analysis begin with defining the geographic and temporal limits of the study; this is generally broader than the study area of the project. Geographic boundaries are typically shown on a map; and a historic baseline is often set at a major event changing the local environment. It appears that certain resources, including noise, transportation and cultural, were not evaluated in the cumulative impacts section of the document. These resources should be evaluated cumulatively.	Noise and transportation have been added to the cumulative effects analysis; cultural resources have not been included as there would be no anticipated impacts on cultural resources from this project. A map has been added as requested. NASA feels the cumulative effects analysis is sufficient for the scope of this project.	Additional language has been added to Section 4 to clarify geographic and temporal boundaries. Please refer to Figure 4-1. Discussion on noise and transportation has been added as Sections 4.4.4 and 4.4.5, respectively.
38	EPA supports minimization of impacts to aquatic and terrestrial environment, and hopes to see innovative stormwater management and low impact development techniques incorporated in project design.	Low impact development (LID) practices would be incorporated into site stormwater management via incorporation of grassy swales around site boundaries and no site curbing.	Language added to Section 3.2.2.2.
39	EPA encourages that the need for this project be clarified by providing additional background information.	NASA has included all available information regarding the need for this project. Please refer to Section 1.3.	No change required.
40	Please clarify why this forested area is being cleared as it is not in the footprint of the building.	The reason for clearing outside of the building footprint would be to accommodate parking lots and sidewalks. Please note that the acreage in the EA refers to the total acreage that would be cleared after all phases of the project have been completed; including a shipping and receiving building and roundabout.	No change required.
41	Any plans for replanting should be stated in	Please refer to Section 3.7.2 for discussion on tree	No change required.

Appendix B

Comment No.	Comment or Recommended Change	NASA Response	Document Revision
	the document.	clearing and revegetation.	
42	Discuss any temporary impacts that may be associated with staging or stock-piling for construction activities. EPA recommends that opportunities to avoid and minimize impacts to forest be explored.	All staging and stock-piling activities would be in the confines of the Erosion and Sediment control BMPs, therefore no additional impacts outside the construction footprint would be expected.	Additional information added to section 3.7.2.
43	Although no aquatic resources will be directly impacted, it would be helpful to include a clear map and description of any resources in the vicinity of the project.	Comment noted.	An updated Figure (3-1) has been included in the final document to better depict surface water in the vicinity of the project.
44	Please provide additional information about stormwater control measures and best management practices (BMPs) that will be incorporated into design plans.	The EA is a planning document. Specific stormwater control measures and BMPs have not been designed but would be implemented in accordance with DCR standards prior to construction, as stated in Section 3.2.2.2.	No change required.
45	The inclusion of low impact development (LID) practices should be considered and are strongly encouraged. In addition to the implementation of LIDs, the stormwater treatment and management structures for the project should not be placed in wetland areas.	No wetlands within 1.50 kilometers (0.95 miles) of the Preferred Alternative or 0.75 kilometers (0.46 miles) of Alternative One. Low impact development (LID) practices would be incorporated into site stormwater management via incorporation of grassy swales around site boundaries and no site curbing (See Section 3.2.2.2).	No change required.
Department of Environmental Quality (DEQ) Federal Consistency Determination Comments			
46	NASA should take all reasonable precautions to limit emissions of volatile organic compounds (VOCs) and oxides of nitrogen (NOx), principally by controlling or limiting the burning of fossil fuels.	NASA would take all reasonable precautions to limit emissions of VOCs and NOx.	Language added to Section 3.3.2.
47	All construction and demolition debris must be characterized in accordance with the <i>Virginia Hazardous Waste Management</i>	All construction and demolition debris would be characterized in accordance with the Virginia Hazardous Waste Management Regulations would	Language added to Section 3.6.2.

Appendix B

Comment No.	Comment or Recommended Change	NASA Response	Document Revision
	<i>Regulations</i> and disposed of at an appropriate facility.	be disposed of appropriately.	
48	Any soil that is suspected of contamination or wastes that are generated during construction-related activities must be tested and disposed of in accordance with applicable federal, state, and local laws and regulations.	Any soil that is suspected of contamination or wastes that are generated during construction-related activities would be tested and disposed of in accordance with applicable Federal, State, and local laws and regulations.	Language added to Section 3.6.2.
49	DGIF does not anticipate this project to result in adverse impacts upon the eagles using this nest. However, it is possible that new bald eagle nests have been constructed in or near the project area during the 2010 nesting season and new nests may be adversely impacted by the project activities.	Before project initiation NASA would consult with resource agencies regarding the location of any new eagle nests.	Language added to Section 3.8.2.
50	Adhere to a time-of-year restriction from March 15 through August 15 of any year for all tree removal and ground clearing to protect resident and migratory songbird during nesting.	Given the scope and location of the project NASA does not feel it is warranted to adhere to time of year restrictions.	No change required.
51	<ul style="list-style-type: none"> • Mark and fence trees at least to the dripline or the end of the root system, whichever extends farther from the tree stem. • Mark trees with highly visible ribbon so that equipment operators can see the protected areas easily. • Do not park heavy equipment, move or stack construction materials near trees which can damage root systems by compacting the soil. • Use mats to minimize soil compaction and 	NASA would follow these recommended measures on the project site to minimize potential impacts to trees.	Language added to Section 3.7.2.

Appendix B

Comment No.	Comment or Recommended Change	NASA Response	Document Revision
	mechanical injury to plants. • Stockpile soil away from trees to avoid killing the root systems.		
52	Potential impacts to public water distribution systems must be verified by the local utility. NASA should field locate and mark wells to ensure the protection of wellheads during construction. VDH-OWD concludes that there are potential impacts to public drinking water sources due to this project.	NASA has reviewed the locations of its existing drinking water supply infrastructure; none of this infrastructure would be affected by this project.	No change required.
53	VDOT's preliminary review indicates that all study intersections are operating at an acceptable level of service. However, detailed traffic analysis must be provided before project initiation.	NASA performed a <u>Left Turn Lane Warrant Study</u> per VDOT recommendations and will continue to actively coordinate with VDOT regarding this project.	No change required.
54	According to VDOT, the reconfiguration must be coordinated with the VDOT Land Development program manager to ensure compliance with access management policies, traffic control practices and all applicable VDOT standards. Also, a land use permit will be required for any work in VDOT easements and right-of-way along with a traffic operation and safety analysis.	Comment noted. NASA is actively coordinating with VDOT regarding this project.	No change required.
55	VDOT encourages the development of bicycle and pedestrian accommodations linking facilities to enhance access while increasing mobility around the multimodal network.	NASA would consider ways to increase mobility among its facilities as practicable.	No change required.
56	DEQ has several pollution prevention	NASA has an active Environmental Management	No change required.

Appendix B

Comment No.	Comment or Recommended Change	NASA Response	Document Revision
	recommendations that may be helpful in the construction of this project and in the operation of the facility.	System at Wallops and regularly incorporates pollution prevention practices into its operations.	
57	The proposed structures should be planned and designed to comply with state and federal guidelines and industry standards for energy conservation and efficiency.	NASA would incorporate energy efficiency and conservation measures to the greatest extent practicable.	No change required.
58	DEQ recommends measures to reduce water use in the operation of this facility.	NASA would incorporate water efficiency and conservation measures to the greatest extent practicable.	No change required.