



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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Douglas W. Domenech
Secretary of Natural Resources

David K. Paylor
Director

(804) 698-4000
1-800-592-5482

November 23, 2010

Fort A.P. Hill Public Affairs Office
18346 4th Street
Fort A.P. Hill, Virginia 22427

RE: Request for Scoping Comments for the Preparation of an Environmental Assessment for the proposed Asymmetric Warfare Group Training Range Site, Fort A.P. Hill, Caroline County

Dear Sir or Madam:

This responds to your October 21, 2010 letter (received October 25, 2010) announcing the preparation of an Environmental Assessment (EA) and soliciting comments on the scope of the document, for activities associated with the proposed construction and operation of a Asymmetric Warfare Group (AWG) Training Range Site at Fort A.P. Hill in Caroline County.

PROJECT DESCRIPTION

According to the letter, the AWG training site would collocate 800-meter and 1,200-meter firing ranges and support facilities. The AWG training range site would be constructed on 675 acres within an existing range area south of Route 301, southeast of Carter's Corner at the southern end of the installation. The 800-meter range would include shooting pads constructed of pervious material and a stabilized, 30-foot by 200-foot shooting range. A gravel parking area, a gravel down range maintenance access road, an operations and storage building, an ammunition breakdown building, a vault latrine and a covered eating shelter would be constructed. The 1,200-meter range would include a control area, down-range electrical systems, range operations center, operations/storage building, bleacher enclosure, after action review building, vehicle staging area, battery storage building, and information systems. The range would consist of two separate driving courses: an improved serpentine gravel road; and an unimproved trail. Target emplacements would be constructed consisting of five-foot square earthen and concrete pads, and a series of steel and/or concrete bunkers. Concrete tuning pads would be situated throughout the range course.

ENVIRONMENTAL REVIEW

The roles of the Virginia Department of Environmental Quality (DEQ) in relation to the project under consideration are as follows. First, DEQ's Office of Environmental Impact Review (OEIR) will coordinate Virginia's review of any environmental documents prepared pursuant to the National Environmental Policy Act (NEPA) and comment to the Army on behalf of the Commonwealth. A similar review process will pertain to the Army's submission of a Federal Consistency Determination (FCD) that must be provided pursuant to the Coastal Zone Management Act (CZMA). If the FCD is included as part of the EA, there can be a single, concurrent review.

FEDERAL CONSISTENCY UNDER THE COASTAL ZONE MANAGEMENT ACT

Pursuant to the Coastal Zone Management Act of 1972, as amended, federal activities affecting Virginia's coastal resources or coastal uses must be consistent with the Virginia Coastal Zone Management Program (VCP) (see section 307(c)(1) of the Act and the *Federal Consistency Regulations*, 15 CFR Part 930, sub-part C). The Army must provide a consistency determination which involves an analysis of the proposed activities in light of the enforceable policies of the VCP (first enclosure), and a commitment to comply with the enforceable policies. In addition, we invite your attention to the advisory policies of the VCP (second enclosure). The Federal Consistency Determination may be provided as part of the NEPA documentation or independently, depending on your agency's preference; we recommend, in the interests of efficiency for all concerned, that it be provided together with the NEPA document and that 60 days be allowed for review in keeping with the *Federal Consistency Regulations* (see section 930.41(a)). Section 930.39 of the *Federal Consistency Regulations* and Virginia's *Federal Consistency Information Package* at <http://www.deq.virginia.gov/eir/federal.html> give content requirements for the consistency determination.

PROJECT SCOPING

While this Office does not participate in scoping efforts beyond the advice given herein, other agencies are free to provide scoping comments concerning the preparation of the NEPA documents for the proposed project. Therefore, we are sharing your letter with selected state and local Virginia agencies, which are likely to include the following (note: starred (*) agencies administer one or more of the enforceable policies of the Virginia Coastal Zone Management Program):

- Department of Environmental Quality:
 - Northern Regional Office*
 - Air Division*
 - Waste Division
- Department of Game and Inland Fisheries*
- Department of Conservation and Recreation:
 - Division of Soil and Water Conservation*
 - Division of Chesapeake Bay Local Assistance*
 - Division of Planning and Recreation Resources

Asymmetric Warfare Group Training Range Site

- Marine Resources Commission*
- Department of Agriculture and Consumer Services
- Department of Health*
- Department of Forestry
- Department of Mines, Minerals, and Energy
- Department of Historic Resources
- George Washington Regional Commission
- Caroline County.

In order to ensure an effective coordinated review of the EA and FCD, we will require 18 copies of the document when it is published. The submission may include 4 hard copies and 14 CDs (or 4 hard copies and an electronic copy available for download at an Army web or ftp site). The document should include a U.S. Geological Survey topographic map as part of its information. We recommend, as well, that project details unfamiliar to people outside the Army be adequately described.

If you have questions about the environmental review process or the federal consistency review process, please feel free to call me at (804) 698-4325 or John Fisher of this Office at (804) 698-4339.

I hope this information is helpful to you.

Sincerely,



for Ellie L. Irons, Manager

Office of Environmental Impact Review

Attachments

Ec: Davie Hartshorn, DEQ-NRO
Kotur S. Narasimhan, DEQ-Air
Paul Kohler, DEQ-Waste
Amy Ewing, DGIF
Robbie Rhur, DCR
Tony Watkinson, VMRC
Barry Matthews, VDH
Todd Groh, VDF
David Spears, DMME
Roger Kirchen, DHR
Keith Tignor, VDACS
Percy Ashcraft, Caroline County
Robert Wilson, George Washington Regional Commission



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Attachment 1

Enforceable Regulatory Programs comprising Virginia's Coastal Zone Management Program (VCP)

- a. **Fisheries Management** - The program stresses the conservation and enhancement of finfish and shellfish resources and the promotion of commercial and recreational fisheries to maximize food production and recreational opportunities. This program is administered by the Marine Resources Commission (VMRC); Virginia Code 28.2-200 to 28.2-713 and the Department of Game and Inland Fisheries (DGIF); Virginia Code 29.1-100 to 29.1-570.

The State Tributyltin (TBT) Regulatory Program has been added to the Fisheries Management program. The General Assembly amended the Virginia Pesticide Use and Application Act as it related to the possession, sale, or use of marine antifoulant paints containing TBT. The use of TBT in boat paint constitutes a serious threat to important marine animal species. The TBT program monitors boating activities and boat painting activities to ensure compliance with TBT regulations promulgated pursuant to the amendment. The VMRC, DGIF, and Virginia Department of Agriculture Consumer Services (VDACS) share enforcement responsibilities; Virginia Code 3.1-249.59 to 3.1-249.62.

- b. **Subaqueous Lands Management** - The management program for subaqueous lands establishes conditions for granting or denying permits to use state-owned bottomlands based on considerations of potential effects on marine and fisheries resources, tidal wetlands, adjacent or nearby properties, anticipated public and private benefits, and water quality standards established by the Department of Environmental Quality (DEQ). The program is administered by the Marine Resources Commission; Virginia Code 28.2-1200 to 28.2-1213.
- c. **Wetlands Management** - The purpose of the wetlands management program is to preserve wetlands, prevent their despoliation, and accommodate economic development in a manner consistent with wetlands preservation.
- (1) The tidal wetlands program is administered by the Marine Resources Commission; Virginia Code 28.2-1301 through 28.2-1320.
 - (2) The Virginia Water Protection Permit program administered by DEQ includes protection of wetlands --both tidal and non-tidal; Virginia Code §62.1-44.15:5 and Water Quality Certification pursuant to Section 401 of the Clean Water Act.

Attachment 1 continued

Page 2

- d. Dunes Management - Dune protection is carried out pursuant to The Coastal Primary Sand Dune Protection Act and is intended to prevent destruction or alteration of primary dunes. This program is administered by the Marine Resources Commission; Virginia Code 28.2-1400 through 28.2-1420.

- e. Non-point Source Pollution Control – (1) Virginia's Erosion and Sediment Control Law requires soil-disturbing projects to be designed to reduce soil erosion and to decrease inputs of chemical nutrients and sediments to the Chesapeake Bay, its tributaries, and other rivers and waters of the Commonwealth. This program is administered by the Department of Conservation and Recreation; Virginia Code 10.1-560 et seq.

(2) Coastal Lands Management is a state-local cooperative program administered by the DCR's Division of Chesapeake Bay Local Assistance and 84 localities in Tidewater (see i) Virginia; Virginia Code §10.1-2100 –10.1-2114 and 9 VAC10-20 et seq.

- f. Point Source Pollution Control - The point source program is administered by the State Water Control Board (DEQ) pursuant to Virginia Code 62.1-44.15. Point source pollution control is accomplished through the implementation of:
 - (1) the National Pollutant Discharge Elimination System (NPDES) permit program established pursuant to Section 402 of the federal Clean Water Act and administered in Virginia as the Virginia Pollutant Discharge Elimination System (VPDES) permit program.
 - (2) The Virginia Water Protection Permit (VWPP) program administered by DEQ; Virginia Code §62.1-44.15:5 and Water Quality Certification pursuant to Section 401 of the Clean Water Act.

- g. Shoreline Sanitation - The purpose of this program is to regulate the installation of septic tanks, set standards concerning soil types suitable for septic tanks, and specify minimum distances that tanks must be placed away from streams, rivers, and other waters of the Commonwealth. This program is administered by the Department of Health (Virginia Code 32.1-164 through 32.1-165).

- h. Air Pollution Control - The program implements the federal Clean Air Act to provide a legally enforceable State Implementation Plan for the attainment and maintenance of the National Ambient Air Quality Standards. This program is administered by the State Air Pollution Control Board (Virginia Code 10-1.1300 through §10.1-1320).

- (i) Coastal Lands Management is a state-local cooperative program administered by the DCR's Division of Chesapeake Bay Local Assistance and 84 localities in Tidewater, Virginia established pursuant to the Chesapeake Bay Preservation Act; Virginia Code §10.1-2100 –10.1-2114 and Chesapeake Bay Preservation Area Designation and Management Regulations; Virginia Administrative Code 9 VAC10-20 et seq.

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.



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
HEADQUARTERS, U.S. ARMY GARRISON, FORT A.P. HILL
18436 FOURTH STREET
FORT A.P. HILL, VIRGINIA 22427-3114

RECEIVED

OCT 25 2010

WFO-Office of Environmental
Impact Review

October 21, 2010

Office of the Commander

Ms. Ellie Irons
Department of Environmental Quality
629 East Main Street
Richmond, VA 23219

Dear Ms. Irons:

The United States Army is preparing an Environmental Assessment (EA) for the proposed construction and operation of the Asymmetric Warfare Group (AWG) Training Range Site at Fort A.P. Hill (FAPH), Virginia. AWG is the Army's asymmetric warfare expert, predicting, and contributing to the rapid defeat of asymmetric threats. This training site would collocate 800-meter and 1200-meter firing ranges and supporting facilities. The proposed training range site would be constructed on 675 acres within a current range area south of Route 301, southeast of Carter's Corner at the southern end of the installation. The site is bounded on the northeast by a series of ponds which drain into Smoots Run. It is bounded on the southeast by Smoots Run and Smoots Pond. The northwest and southwest boundaries lie near and along Danger Trail. The training range site would be a controlled access area, as are all the training sites within the southern impact area of Fort A. P. Hill.

The 800-meter range would include shooting pads constructed of pervious material and a stabilized, 30-foot by 200-foot shooting range. A gravel parking area, a gravel down range maintenance access road, an operations and storage building, an ammunition breakdown building, a vault latrine and a covered eating shelter also would be constructed.

The 1200-meter range would include a control area, down-range electrical systems, range operations center, operations/storage building, bleacher enclosure, after action review building, vehicle staging area, battery storage building, and information systems. The range itself would consist of two separate driving courses. One course would be an improved serpentine gravel road, the other an unimproved trail. The improved serpentine driving course would be 15 to 20 feet wide with a gravel base strong enough to accommodate medium tactical vehicles performing simultaneous training exercises. Both stationary and moving armor and infantry targetry would be emplaced on the 1200-meter range. Targetry would consist of a series of free standing, portable radio-controlled and battery operated targets, target emplacements consisting of five-foot square earthen and concrete pads, a series of steel and/or concrete bunkers and berms, four moving armored targets, and multiple pop-up targets. Concrete turning pads able to accommodate both wheeled and tracked vehicles would be situated throughout the range course.

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While the anticipated average daily number of military personnel expected on site is 24 persons, the AWG ranges could accommodate up to 40 individuals simultaneously participating in multiple training activities and operations during daytime and nighttime hours.

Because the proposed project would rely on federal funding and would occur on federal property, the Army must comply with the National Environmental Policy Act of 1969, as amended (NEPA). We welcome any comments you may have regarding the proposed project, particularly on environmental impacts and alternatives to the proposed action. Our intent is to address your agency's concerns and incorporate any recommendations into the NEPA process at the earliest possible time. To aid in your review, we are enclosing a project location map depicting the site.

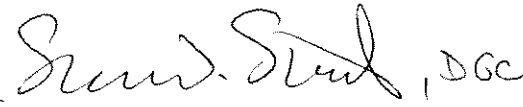
We request that you provide a written response to this letter by November 18, 2010. Please send your response to Fort A.P. Hill Public Affairs Office, 18346 4th Street, Fort A.P. Hill, Virginia 22427 or by email at faphpao@conus.army.mil. If you have any questions, please contact the Public Affairs Office at (804) 633-8324/8120 or at the above referenced email address.

Also, as part of the NEPA scoping process, the public is invited to attend an open house anytime between the hours of 5:00 to 8:00 p.m. on November 3 at the Bowling Green Town Hall at 117 Butler Street. The open house is being held to invite comments and questions from the public and discuss the environmental analysis that will be conducted as required by the National Environmental Policy Act.

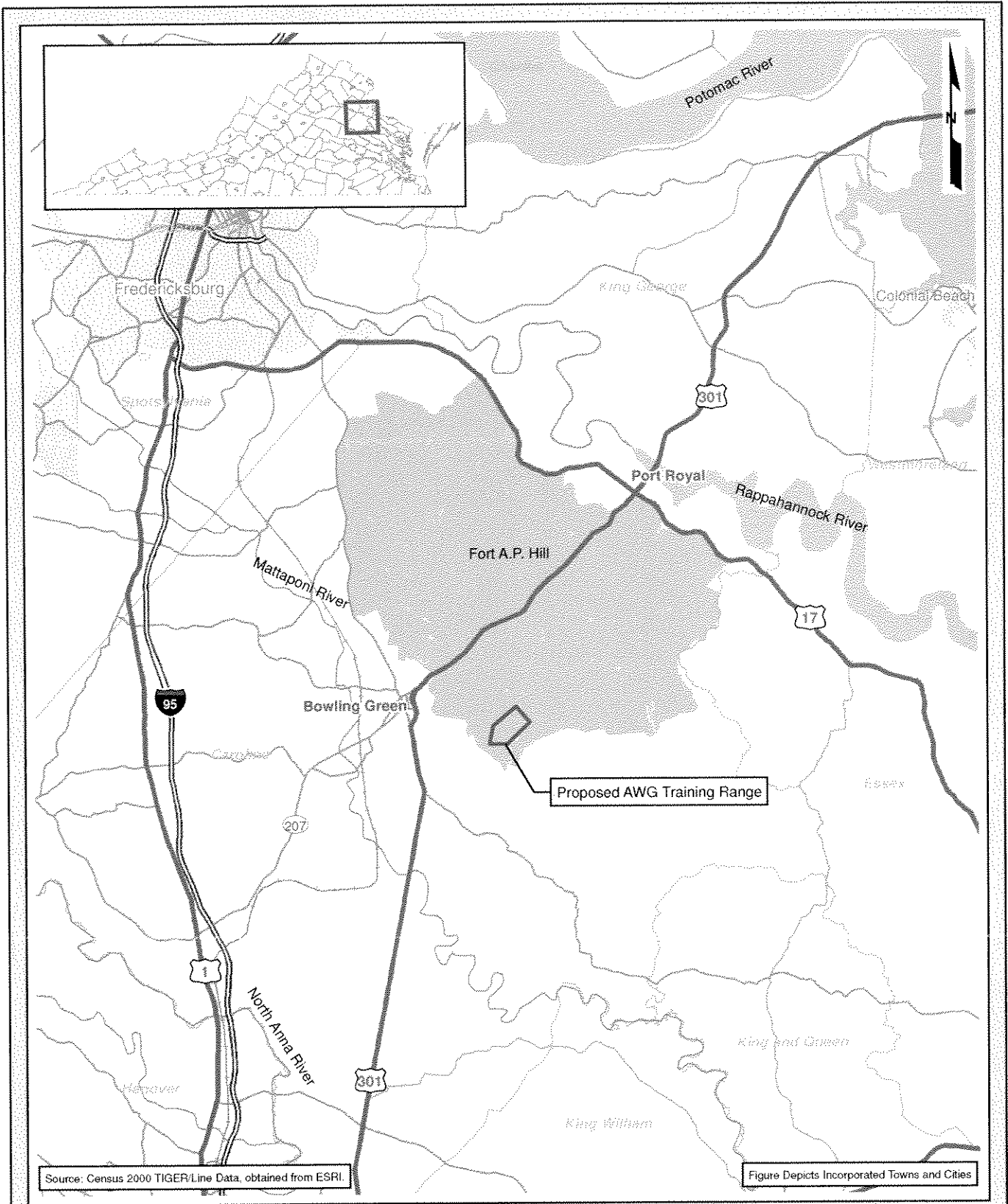
There will be an additional opportunity to comment on this project during the review process for the Environmental Assessment.

We look forward to working with you.

Sincerely,

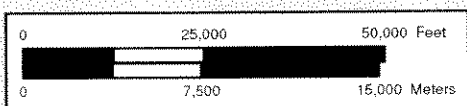

For John W. Haefner, DGC
Lieutenant Colonel, US Army
Commanding

Enclosures



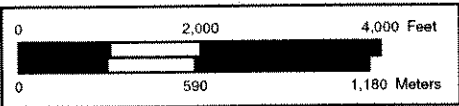
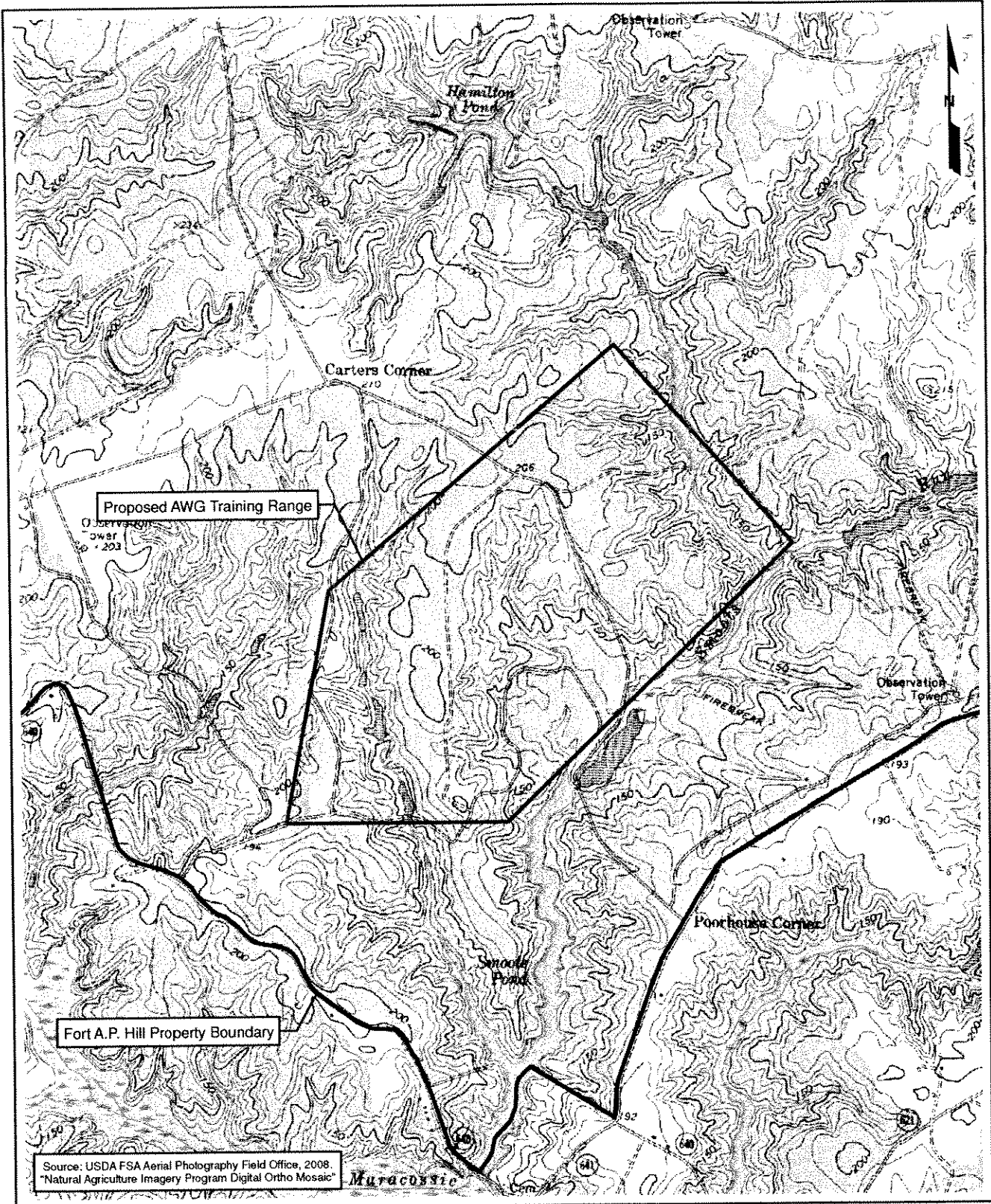
Source: Census 2000 TIGER/Line Data, obtained from ESRI.

Figure Depicts Incorporated Towns and Cities



Regional Location
 AWG Training Range Complex
 Fort A.P. Hill, Virginia

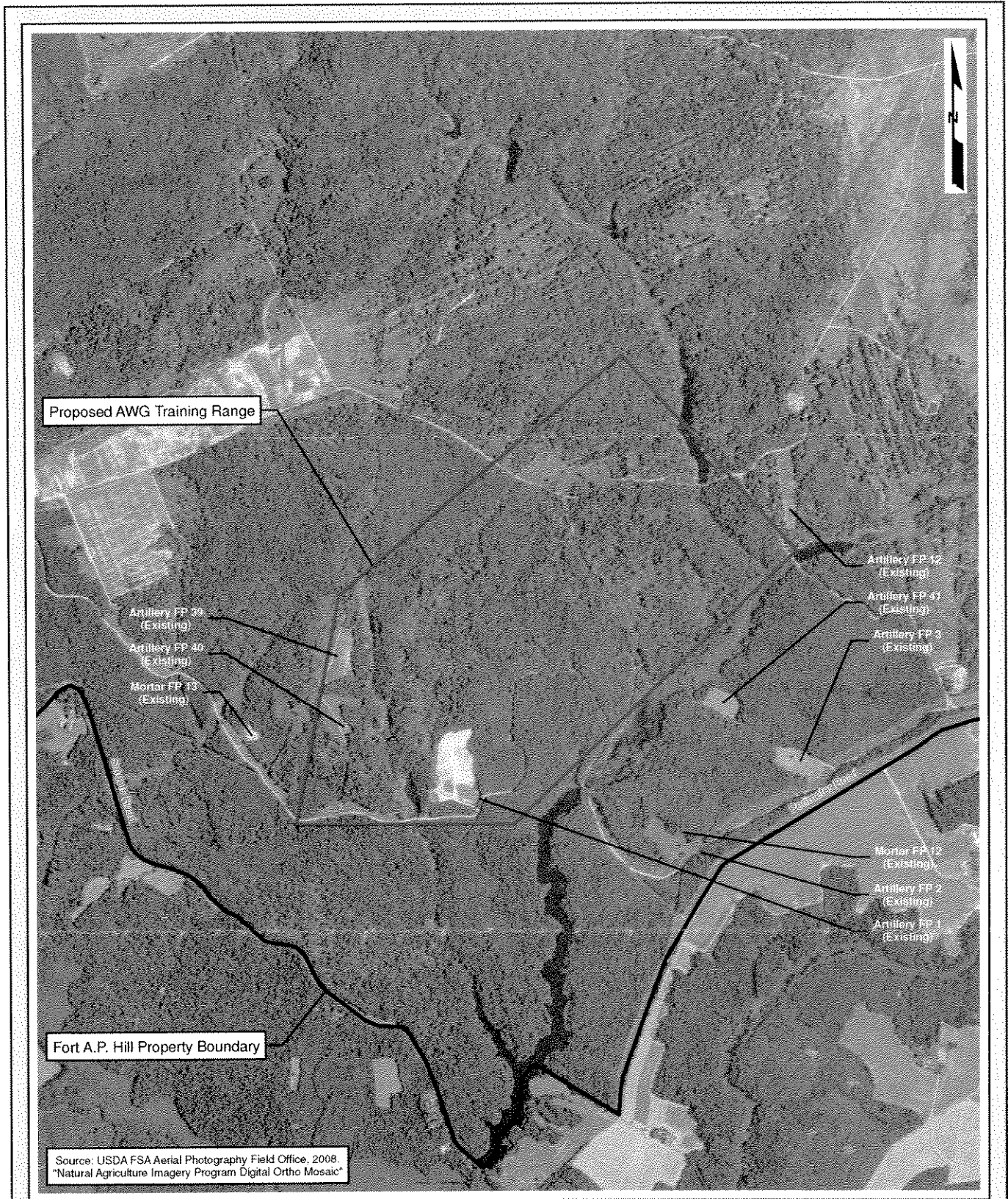
Figure 1



Site Location and Topography

AWG Training Range Complex
Fort A.P. Hill, Virginia

Figure 2



Proposed AWG Training Range

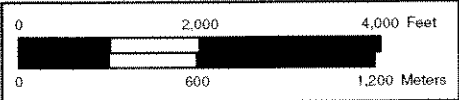
Artillery FP 39
(Existing)
Artillery FP 40
(Existing)
Mortar FP 13
(Existing)

Artillery FP 12
(Existing)
Artillery FP 41
(Existing)
Artillery FP 3
(Existing)

Mortar FP 12
(Existing)
Artillery FP 2
(Existing)
Artillery FP 1
(Existing)

Fort A.P. Hill Property Boundary

Source: USDA FSA Aerial Photography Field Office, 2008.
"Natural Agriculture Imagery Program Digital Ortho Mosaic"



Aerial Photograph
AWG Training Range Complex
Fort A.P. Hill, Virginia

Figure
3