

FINAL

ENVIRONMENTAL ASSESSMENT for Gambo Creek Bridge Replacement at Naval Support Facility Dahlgren Dahlgren, Virginia



Naval Support Activity SOUTH POTOMAC

September 2020



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### Abstract

Designation:	Environmental Assessment
Title of Proposed Action:	Gambo Creek Bridge Replacement
Project Location:	Naval Support Facility Dahlgren, Virginia
Lead Agency for the EA:	Department of the Navy
Affected Region:	Dahlgren, Virginia
Action Proponent:	Naval Support Activity South Potomac
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Date:	September 2020

Naval Support Activity South Potomac (NSASP), a command of the United States Navy, has prepared this Environmental Assessment (EA) in accordance with the National Environmental Policy Act (NEPA), as implemented by the Council on Environmental Quality Regulations and Navy Regulations for implementing NEPA. The Proposed Action would provide a bridge that carries Tisdale Road traffic over Gambo Creek at Naval Support Facility Dahlgren in the vicinity of the current Gambo Creek Bridge (#158). The proposed bridge would meet current Federal Highway Administration engineering standards for widths and load ratings to safely and adequately support mission activities and safety requirements. The proposed bridge would be located either on the same footprint of the current bridge, or just south of it. Furthermore, under two of the action alternatives, the existing bridge would be demolished. The Proposed Action would include demolition and disposal of the existing utility lines (i.e., electric, water, sewer, and communications), constructing new foundation pilings, and realigning the roadway, if required. This EA evaluates the potential environmental impacts associated with three action alternatives and the No Action Alternative on the following resource areas in detail: air quality, water resources, geological resources, cultural resources, biological resources, infrastructure, and hazardous materials and wastes.





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### **Executive Summary**

#### ES.1 Proposed Action

Naval Support Activity South Potomac (NSASP), a command of the United States (U.S.) Navy (hereinafter, jointly referred to as the Navy), proposes to provide a bridge that carries Tisdale Road traffic over Gambo Creek at Naval Support Facility (NSF) Dahlgren. The current Gambo Creek Bridge (#158) was built in 1940 for internal installation support and shows advanced deterioration. Current conditions of the structure have resulted in vehicle weight restrictions that prohibit installation fire trucks from crossing the bridge. The replacement bridge would meet current Federal Highway Administration (FHWA) engineering standards to safely and adequately support mission activities and safety requirements. The proposed bridge would be located either on the same footprint of the current bridge, or just south of the current alignment. New foundation pilings would be required, and the existing bridge would be demolished under two of the action alternatives. The Proposed Action includes the demolition and disposal of the existing utility lines that are attached to the bridge structure. Construction of the new utility lines is not being considered as part of the Proposed Action since new utility lines will be constructed underground before the new bridge would be replaced. Construction activities are anticipated to begin in fiscal year 2021.

#### ES.2 Purpose of and Need for the Proposed Action

The purpose of the Proposed Action is to provide a bridge meeting FHWA engineering standards to carry Tisdale Road traffic over Gambo Creek. Gambo Creek Bridge (#158) is not able to meet current FHWA engineering standards for widths and load ratings to support fire trucks, delivery trucks, and other utility trucks and equipment that provide critical services 24 hours per day, seven days a week for the installation community and mission.

The Proposed Action is needed because the existing physical bridge structure is deteriorating. The last inspection concluded that the bridge was structurally deficient, functionally obsolete by current FHWA standards, and in poor condition overall. The report affirmed that the structure had deteriorated to a point that makes it unsafe for its originally designed load capacity. The inspection report recommended that the speed limit be reduced to 20 miles per hour across the bridge and the load rating reduced from 20 tons to 9 tons. As a result, the weight restrictions have prohibited fire trucks from crossing the bridge. In addition to the weight restrictions, Gambo Creek Bridge does not meet current FHWA engineering standards for widths to adequately support fire trucks. The bridge is considered functionally obsolete as a two-lane vehicular facility according to current FHWA standards because it is too narrow.

#### ES.3 Alternatives Considered

Alternatives were developed for analysis based upon the following reasonable alternative screening factors:

- The bridge must be aligned to connect Tisdale Road on both sides of Gambo Creek.
- The bridge should not be on a curved horizontal alignment.
- The bridge should not be located in a sump (low point) in the roadway profile as bridge deck sumps result in an area where water collects and can lead to safety and maintenance issues.
- The location should have a low potential for unexploded ordnance (UXO).
- The excavation of undisturbed, natural habitat should be limited to the extent possible.

The Navy is considering three action alternatives that meet the purpose of and need for the Proposed Action and a No Action Alternative. Under Alternative 1 (Preferred Alternative), the existing bridge would be completely demolished and then rebuilt on the existing footprint. Under Alternative 2, the bridge would be built to the south of the existing footprint. Once the new bridge is completed, the existing bridge would be demolished. Under Alternative 3, the existing bridge would be repaired, and a parallel bridge would be built to the south of the existing footprint. Under the No Action Alternative, the Proposed Action would not be implemented.

#### ES.4 Summary of Environmental Resources Evaluated in the Environmental Assessment

Council on Environmental Quality (CEQ) regulations, National Environmental Policy Act (NEPA), and Navy instructions for implementing NEPA, specify that an Environmental Assessment (EA) should address those resource areas potentially subject to impacts. In addition, the level of analysis should be commensurate with the anticipated level of environmental impact.

Important resources analyzed in the EA include water, cultural, and biological resources; and hazardous materials and wastes. All alternatives would result in impacts on wetlands, an increase in impervious surface, potential impacts on cultural resources, and a loss of trees. In addition, the project site is adjacent to several installation restoration (IR) sites. NSF Dahlgren is within Virginia's coastal zone; therefore, a Federal Consistency Determination was submitted to the Virginia Department of Environmental Quality (DEQ).

The following resource areas have been addressed in detail in this EA: air quality, water resources, geological resources, cultural resources, biological resources, infrastructure, and hazardous materials and wastes. Because potential impacts were considered to be negligible or nonexistent, the following resources were not evaluated in detail in this EA: land use, visual resources, noise, transportation, public health and safety, socioeconomics, and environmental justice.

# ES.5 Summary of Potential Environmental Consequences of the Action Alternatives and Major Mitigating Actions

Table ES-1 provides a tabular summary of the potential impacts on the resources associated with the No Action Alternative and the three action alternatives.

Resource Area	No Action Alternative	Alternative 1: Existing Bridge Alignment (Preferred Alternative)	Alternative 2: Southern Bridge Alignment	Alternative 3: Parallel Bridge Alignment
Air Quality	Minor regional increases from growth in the county. No significant impacts.	Short-term, minor emissions from operating heavy equipment during site preparation, construction, and demolition activities. No increases in the long term. No significant impacts.	Short-term, minor emissions from operating heavy equipment during site preparation, construction, and demolition activities. No increases in the long term. No significant impacts.	Short-term, minor emissions from operating heavy equipment during site preparation, construction, and demolition activities. No increases in the long term. No significant impacts.
Water Resources	No change in baseline conditions. No significant impacts.	Short-term, minor impacts on jurisdictional wetlands and water bodies from construction disturbance. New abutments and bridge aprons would require fill within jurisdictional wetlands. Any fill within jurisdictional wetlands would be permitted and mitigated in accordance with Section 404 of the Clean Water Act. With mitigations and Section 404 permitting for impacts on jurisdictional wetlands, no significant impacts.	Similar to Alternative 1, but with increased impacts on jurisdictional wetlands and surface waters due to the larger footprint. With mitigations and Section 404 permitting for impacts on jurisdictional wetlands, no significant impacts.	Similar to Alternative 1, but with increased impacts on jurisdictional wetlands and surface waters due to the larger footprint. With mitigations and Section 404 permitting for impacts on jurisdictional wetlands, no significant impacts.

#### Table ES-1 Summary of Potential Impacts on Resource Areas

Resource Area	No Action Alternative	Alternative 1: Existing Bridge Alignment (Preferred Alternative)	Alternative 2: Southern Bridge Alignment	Alternative 3: Parallel Bridge Alignment
Geological Resources	No change in baseline conditions. No significant impacts.	Short- and long-term, minor effects from construction and increases in impervious surface. No significant impacts.	Short- and long-term, minor effects from construction and increases in impervious surface. No significant impacts.	Short- and long-term, minor effects from construction and increases in impervious surface. No significant impacts.
Cultural Resources	Long-term, minor, adverse effect on the Dahlgren Mainside Historic District due to bridge deterioration. No significant impacts.	Long-term adverse effect on the Dahlgren Mainside Historic District due to bridge demolition. Possibility for unanticipated discovery; SOP 5 would be followed. Potential long-term adverse effect on Site 44KG0157 due to bridge construction. With the execution of mitigation measures between the Navy and the SHPO in a PA, no significant impacts.	Long-term adverse effect on the Dahlgren Mainside Historic District due to bridge demolition. Long-term adverse effect on Site 44KG0157 due to bridge and road construction. With the execution of mitigation measures between the Navy and the SHPO in a PA, no significant impacts.	Beneficial effects on the bridge due to planned repairs. Long-term adverse effect on Site 44KG0157 due to bridge and road construction. With the execution of mitigation measures between the Navy and the SHPO in a PA, no significant impacts.

Resource Area	No Action Alternative	Alternative 1: Existing Bridge Alignment (Preferred Alternative)	Alternative 2: Southern Bridge Alignment	Alternative 3: Parallel Bridge Alignment
Biological Resources	No change in baseline conditions. No significant impacts.	Short-term, negligible impacts on terrestrial wildlife, Atlantic and shortnose sturgeon, bald eagle, northern long-eared bat, tri-colored bat, little brown bat, peregrine falcon, and eastern black rail; these resources would be only temporarily or indirectly affected, if at all, during construction activities. Short- term, minor impacts on vegetation, aquatic habitats, SAV, alewife, blueback herring, red hake, monarch butterfly, red-bellied cooter, and spotted turtle; these resources could occur within the project area and be affected by construction but affected habitat and duration would be minimal. No significant impacts.	Short-term, negligible impacts on Atlantic and shortnose sturgeon, northern long-eared bat, tri-colored bat, little brown bat, peregrine falcon, and eastern black rail; these resources would be only temporarily or indirectly affected, if at all, during construction activities. Short- term, minor impacts on aquatic habitats, SAV, alewife, blueback herring, red hake, bald eagle, red-bellied cooter, and spotted turtle; these resources could occur within the project area and be affected by construction but affected habitat and duration would be minimal. Long-term, negligible impacts on vegetation, terrestrial wildlife, and monarch butterfly. No significant impacts.	Short-term, negligible impacts on Atlantic and shortnose sturgeon, northern long-eared bat, tri-colored bat, little brown bat, peregrine falcon, and eastern black rail; these resources would be only temporarily or indirectly affected, if at all, during construction activities. Short- term, minor impacts on SAV, alewife, blueback herring, red hake, red-bellied cooter, and spotted turtle. Long-term, negligible impacts on bald eagle and terrestrial wildlife; these resources could occur within the project area and be affected by construction but affected habitat and duration would be minimal. Long-term minor impacts on vegetation, aquatic habitats, and monarch butterfly.
Infrastructure	Ongoing minimal maintenance could result in bridge closure and loss of utility services. Major impacts are possible.	Long-term beneficial effects from a safer, more reliable bridge. No significant impacts.	Possible relocation of communications panels or lines. Long-term beneficial effects from a safer, more reliable bridge. No significant impacts.	No significant impacts. Possible relocation of communications panels or lines. Improvements over No Action for long-term safety and reliability, but less beneficial than Alternatives 1 or 2. No significant impacts.

Resource Area	No Action Alternative	Alternative 1: Existing Bridge Alignment (Preferred Alternative)	Alternative 2: Southern Bridge Alignment	Alternative 3: Parallel Bridge Alignment
Hazardous Materials and Wastes	Continued operation with existing management plans and policies that govern hazardous materials and wastes. No significant impact.	Short-term impacts associated with increased use of hazardous materials and generation of hazardous wastes. Demolished bridge components may contain special hazards; wastes would be characterized and disposed of appropriately. Short-term potential to encounter hazards associated with the active range and contamination from IR Site 001; surveys and clearing/remediation prior to beginning construction activities would occur. Short- term potential to encounter subsurface radionuclides of concern within IR Site 061B; proper health and safety procedures would be implemented for workers. No significant impacts.	Similar to but greater than Alternative 1 because of the larger project site, which increases use of hazardous materials and generation of hazardous waste, and the potential to encounter munitions-related hazards and contamination and potential radionuclides. No significant impacts.	Similar to but slightly less that Alternative 2 because the bridge would not be demolished, which decreases potential for hazardous waste or special hazards. No significant impacts.

Key: IR = Installation Restoration; PA = Programmatic Agreement; SAV = submerged aquatic vegetation; SHPO = State Historic Preservation Office; SOP = Standard Operating Procedure.

#### ES.6 Public Involvement

The Navy prepared and circulated a Draft EA to inform the public of the Proposed Action and to allow the opportunity for public review and comment. The review period began with a Notice of Availability published in the *Free Lance-Star* on February 14, 2020. The Draft EA was available on a Navy website.

The Navy coordinated or consulted with agencies including the U.S. Army Corps of Engineers (USACE), U.S. Fish and Wildlife Service (USFWS), National Oceanic and Atmospheric Administration (NOAA) Fisheries, U.S. Coast Guard (USCG), Virginia DEQ, Virginia Department of Historic Resources (VDHR), Virginia Department of Conservation and Recreation (VDCR), Virginia Marine Resources Commission (VMRC), Virginia Department of Transportation (VDOT), the King George County Wetlands Board, and King George Engineering and Public Works regarding the Proposed Action. The Navy also consulted with seven federally recognized Native American Tribes who may have an interest in this location.

All public agency coordination, comments, and responses are provided in Appendix B.

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### **ENVIRONMENTAL ASSESSMENT**

### Gambo Creek Bridge Replacement

### Naval Support Facility Dahlgren, Dahlgren, Virginia

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Acronym	Definition	Acronym	Definition
ACM	asbestos-containing material	NPDES	National Pollutant Discharge
AHPA	Archeological and Historic		Elimination System
	Preservation Act	NRHP	National Register of Historic
AIRFA	American Indian Religious		Places
	Freedom Act	NSASP	Naval Support Activity South
APE	area of potential effect		Potomac
ARPA	Archaeological Resources	NSF	Naval Support Facility
	Protection Act	PA	Programmatic Agreement
BMP	best management practice	PCB	polychlorinated biphenyl
CEQ	Council on Environmental	PM <sub>2.5</sub>	fine particulate matter less than
	Quality		or equal to 2.5 micrometers in
CFR	Code of Federal Regulations		diameter
CO <sub>2</sub> e	carbon dioxide equivalent	PM10	suspended particulate matter
CZMA	Coastal Zone Management Act		less than or equal to 10
DEQ	(Virginia) Department of		micrometers in diameter
	Environmental Quality	ppt	parts per thousand
DERP	Defense Environmental	RCRA	Resource Conservation and
	Restoration Program		Recovery Act
DoD	United States Department of	RDT&E	research, development, test, and
	Defense		evaluation
EA	Environmental Assessment	SAV	submerged aquatic vegetation
EEA	Explosives Experimental Area	SHPO	State Historic Preservation Office
EFH	Essential Fish Habitat	SOP	Standard Operating Procedure
EO	Executive Order	SWPPP	Stormwater Pollution Prevention
EXWC	Engineering and Expeditionary	TOOL	Plan
	Warfare Center	TSCA	Toxic Substances Control Act
FHWA	Federal Highway Administration	U.S.	United States
GHG	greenhouse gas	U.S.C.	United States Code
ICRMP	Integrated Cultural Resource	USACE	U.S. Army Corps of Engineers
ID	Management Plan	USEPA	U.S. Environmental Protection
IR LBP	installation restoration	USFWS	Agency U.S. Fish and Wildlife Service
mNSR	lead-based paint minor New Source Review	USCG	U.S. Coast Guard
NAAQS	National Ambient Air Quality	UXO	
NAAQJ	Standards	VDCR	unexploded ordnance Virginia Department of
NAGPRA	Native American Graves	VDCK	Conservation and Recreation
NAGENA	Protection and Repatriation Act	VDGIF	Virginia Department of Game
NAVFAC	Naval Facilities Engineering	VDOII	and Inland Fisheries
NAVIAC	Command	VDOT	Virginia Department of
NEPA	National Environmental Policy	VDOT	Transportation
	Act	VDHR	Virginia Department of Historic
NHPA	National Historic Preservation	VUIII	Resources
	Act	VMRC	Virginia Marine Resources
NOAA	National Oceanic and	vivince	Commission
	Atmospheric Administration		
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### Abbreviations and Acronyms

### **1** Purpose of and Need for the Proposed Action

#### 1.1 Introduction

Naval Support Activity South Potomac (NSASP), a command of the United States (U.S.) Navy (hereinafter, jointly referred to as the Navy), proposes to provide a bridge that carries Tisdale Road traffic over Gambo Creek at Naval Support Facility (NSF) Dahlgren. The current Gambo Creek Bridge (#158) was built in 1940 for internal installation support and shows advanced deterioration. Current conditions of the structure have resulted in vehicle weight restrictions that prohibit installation fire trucks from crossing the bridge. The replacement bridge would meet current Federal Highway Administration (FHWA) engineering standards to safely and adequately support mission activities and safety requirements. The proposed bridge would be located either on the same footprint of the current bridge, or just south of the current alignment. In addition, new foundation pilings would be required. Furthermore, under two of the action alternatives, the existing bridge would be demolished. Tisdale Road may require realignment on either side of the bridge span. The Proposed Action includes the demolition and disposal of the existing utility lines that are attached to the bridge structure. Construction of new utility lines is not being considered as part of the Proposed Action since the new utility lines will be constructed underground before the new bridge would be replaced. Construction activities are anticipated to begin in fiscal year 2021.

The Navy has prepared this Environmental Assessment (EA) in accordance with the National Environmental Policy Act (NEPA), as implemented by the Council on Environmental Quality (CEQ) Regulations and Navy Regulations for implementing NEPA.

#### 1.2 Background

NSF Dahlgren was founded in 1918 as the Naval Proving Ground. It was initially established on 4,000 acres bounded by the Potomac River and Upper Machodoc Creek in King George County as a remote extension of Maryland's Indian Head Proving Ground for testing naval guns. The site was named the Lower Station, Dahlgren Naval Proving Ground in honor of Rear Admiral John Adolphus Dahlgren. The location on the Potomac River was specifically chosen for the development of a ballistic range, required for the testing of modern, high-powered munitions.

In 2003, Commander, Navy Installations Command (CNIC) officially stood up with the sole charter of providing shore installation management services to all Navy activities. As part of CNIC, all naval installations within the National Capital Region are aligned with Naval District Washington. In November 2005, NSASP was commissioned as a component of Naval District Washington with responsibility for shore installation management for the Dahlgren base, which was renamed NSF Dahlgren (CNIC, 2019). Over the past 100 years, activities at NSF Dahlgren have expanded to include research and development of weapons systems, development of fire control and targeting software, satellite geodesy, and development of new ammunition and gun systems.

Gambo Creek Bridge (#158) currently carries Tisdale Road traffic over Gambo Creek at NSF Dahlgren. The bridge is a reinforced concrete structure that was built in 1940 primarily as a railroad trestle for the movement of 16-inch guns mounted on flatcars. When rail car movement was phased out, it became a vehicular bridge. The bridge spans 493 feet and has 120 wooden piles. A bridge inspection conducted in 2018 concluded that Gambo Creek Bridge was structurally deficient, functionally obsolete by current FHWA standards, and in poor condition overall. The report affirmed that the structure had deteriorated to a point that it is unsafe for its originally designed load capacity. The inspection report recommended that the speed limit be reduced to 20 miles per hour across the bridge and the load rating reduced from 20 tons to 9 tons.

#### 1.3 Location

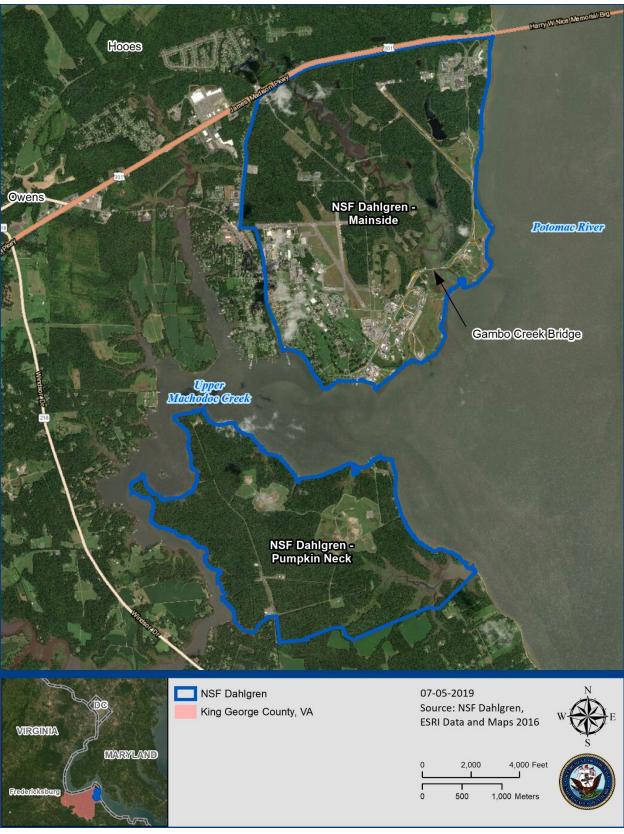
NSF Dahlgren is in King George County, Virginia, along the western bank of the Potomac River, approximately 23 miles east of Fredericksburg and 55 miles south of Washington, DC (Figure 1-1). NSF Dahlgren is divided into two land masses by Upper Machodoc Creek: (1) Mainside, and (2) the Explosives Experimental Area (EEA; also known as Pumpkin Neck). Most of the development at NSF Dahlgren is on Mainside, which consists of 2,677 acres and 4.2 miles of shoreline along the western bank of the Potomac River and the northern bank of Upper Machodoc Creek. Development on Mainside primarily consists of operational and support activities and military housing. The EEA, a critical testing area, consists of 1,641 acres and 6.1 miles of shoreline along the western bank of the Potomac River and the southern bank of Upper Machodoc Creek. The Proposed Action would occur on the Mainside of NSF Dahlgren.

#### 1.4 Purpose of and Need for the Proposed Action

The purpose of the Proposed Action is to provide a bridge meeting FHWA engineering standards to carry Tisdale Road traffic over Gambo Creek. Gambo Creek Bridge (#158) is not able to meet current FHWA engineering standards for widths and load ratings to support fire trucks, delivery trucks, and other utility trucks and equipment that provide critical services 24 hours per day, seven days a week for the installation community and mission. The bridge is an important transportation route that connects the northern and southern parts of Mainside. The bridge provides the most efficient route between the work centers at the southern part of Mainside (Public Works, Naval Surface Warfare Center Dahlgren Division ranges, community support) and the northern part of Mainside (Naval Surface Warfare Center Dahlgren Division Terminal Range, Joint Warfare Analysis Center, and other Naval Surface Warfare Center Dahlgren Division facilities).

The Proposed Action is needed because the existing physical bridge structure is deteriorating. The last inspection—conducted by Naval Facilities Engineering Command (NAVFAC) Engineering and Expeditionary Warfare Center (EXWC) on June 15, 2018—concluded that bridge #158 was structurally deficient, functionally obsolete by current FHWA standards, and in poor condition overall. The report affirmed that the structure had deteriorated to a point that makes it unsafe for its originally designed load capacity. Examples of deterioration cited in the report include exposed and heavily corroded steel reinforcing components, deep honeycombing, severe spalling on piles and piers (up to six feet long by six inches wide and two inches deep), section loss on exposed concrete piles (up to 20 percent), longitudinal cracking in structural beams (up to a quarter-inch wide), and deep alligator cracking and chipping on the deck (up to one inch deep).

The inspection report recommended that the speed limit be reduced to 20 miles per hour across the bridge and the load rating reduced from 20 tons to 9 tons. As a result, the weight restrictions have prohibited fire trucks from crossing the bridge. There are two bridges (#158 and #159) that cross Gambo Creek. Both bridges can be used to travel between the northern and southern parts of Mainside, but Gambo Creek Bridge (#158) offers a shorter route. The weight restriction means that trucks must use bridge #159, which is a longer route that increases the emergency response time and the risk of a negative outcome in the event of a fire or other life-threatening emergency.





Per Department of Defense (DoD) Instruction 6055.06, *DoD Fire and Emergency Services Program*, the Fire Department's first arriving company needs to be on scene within seven minutes of dispatch. The current emergency response time using bridge #159 is nine minutes (Navy, 2018), which exceeds the seven-minute response time requirement stated in DoD Instruction 6055.06. Furthermore, bridge #159 is sometimes closed due to firing range and explosives operations and has traffic from the morning and evening rush hours; both of these factors can increase the travel time between the fire station on the western portion of Mainside and destinations on the eastern portion. In addition to the weight restrictions, Gambo Creek Bridge does not meet current FHWA engineering standards for widths to adequately support fire trucks. The bridge is considered functionally obsolete as a two-lane vehicular facility according to current FHWA standards because it is too narrow. The bridge provides only the bare minimum clearance for two lanes of motor traffic (18 feet), and vehicles cross the bridge as if it were a one-way crossing even though it is not demarcated as such.

#### 1.5 Scope of Environmental Assessment

This EA includes an analysis of potential environmental impacts associated with three action alternatives and the No Action Alternative. The environmental resource areas analyzed in detail in this EA include air quality, water resources, geological resources, cultural resources, biological resources, infrastructure, and hazardous materials and waste. The study area for each resource analyzed will differ due to how the Proposed Action interacts with or affects the resource. For instance, the study area for geological resources might only include the construction footprint of the bridge whereas the study area for air quality would expand out to include areas that may be affected by construction emissions.

The Navy has prepared this EA based on federal and state laws, statutes, regulations, and policies pertinent to the implementation of the Proposed Action, which are listed in Appendix A. A description of the Proposed Action's consistency with these laws, policies, and regulations, as well as the names of regulatory agencies responsible for their implementation, is also presented in Appendix A.

#### 1.6 Public and Agency Participation and Intergovernmental Coordination

Regulations from the CEQ direct agencies to involve the public in preparing and implementing their NEPA procedures. Public involvement and agency correspondence materials are in Appendix B.

The Navy published a Notice of Availability of the Draft EA for three consecutive days in the *Free Lance-Star* beginning on February 14, 2020. The notice described the Proposed Action, solicited public comments on the Draft EA, provided dates of the public comment period, and announced where a copy of the EA was available for review. The public comment period ended March 15, 2020. No comments were received from private citizens.

The Navy coordinated or consulted with agencies regarding the Proposed Action, including the U.S. Army Corps of Engineers (USACE), U.S. Fish and Wildlife Service (USFWS), National Oceanic and Atmospheric Administration (NOAA) Fisheries, U.S. Coast Guard (USCG), Virginia Department of Environmental Quality (DEQ), Virginia Department of Historic Resources (VDHR), Virginia Department of Conservation and Recreation (VDCR), Virginia Marine Resources Commission (VMRC), Virginia Department of Transportation (VDOT), the King George County Wetlands Board, and King George Engineering and Public Works. The Navy also consulted with nine federally recognized Native American Tribes who may have an interest in this location: the Pamunkey Indian Tribe, the Chickahominy Indian Tribe, the Chickahominy Indians Eastern Division, the Upper Mattaponi Tribe, the Rappahannock Tribe, the Nansemond Indian Tribe, the Monacan Indian Nation, the Delaware Nation, and the Delaware Tribe. A response was received from the Pamunkey Indian Tribe. All correspondences sent to and received from public agencies are in Appendix B.

The Navy submitted a Federal Consistency Determination package to the Virginia DEQ. DEQ provided a thorough interagency and local government review pursuant to the enforceable policies of Virginia's approved Coastal Zone Management Program. The following agencies and organizations reviewed the Draft EA as part of this interagency coordination and review process:

- DEQ
- VDCR
- Virginia Department of Game and Inland Fisheries (VDGIF)
- VMRC
- Virginia Department of Health
- VDHR
- King George County
- Greater Washington Regional Commission

Pursuant to the Coastal Zone Management Act, DEQ also published notice of the Draft EA from February 14 through March 13, 2020, as noted in their letter; DEQ did not receive any public comments during this time. The EA was updated to note interagency comments received, and the full letter and all recommendations are included in Appendix B. DEQ concurred that the Proposed Action is consistent with the enforceable policies of Virginia's Coastal Zone Management Program, provided that the Navy obtains and complies with all applicable permits, approvals, and regulatory requirements.

The Navy submitted a project review package to the USFWS Virginia Field Office to complete the environmental review for this Proposed Action. The USFWS Virginia Field Office accepted the package and had no further comments or concerns regarding the project.

The VDCR Division of Natural Heritage commented that no natural heritage resources (i.e., habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, or significant geologic formations) have been documented within the project boundary including a 100-foot buffer, and that the Proposed Action would not affect any documented state-listed plants or insects. This information has been incorporated into Section 3.5.2.

NOAA Fisheries Protected Resources Division concurred that there would be no impact on fish species protected under the Endangered Species Act, and that consultation in accordance with section 7 of the Endangered Species Act is not necessary.

NOAA Fisheries noted that best management practices (BMPs) and time of year restriction recommendations to minimize impacts on Essential Fish Habitat (EFH) would depend on the means and methods of bridge demolition and construction. The Navy will further consult with NOAA Fisheries regarding impacts on EFH and minimization measures as project designs are further developed. Information provided by NOAA Fisheries consultation has been incorporated into Section 3.5.3.

The Navy has initiated Section 106 consultation under the National Historic Preservation Act with VDHR and Native American Tribes. The Navy will execute a Programmatic Agreement (PA) with VDHR to further consultations as project details are known. The Pamunkey Indian Tribe provided several comments, which have been incorporated into Section 3.4. The Pamunkey Indian Tribe will be a consulting party for the Section 106 consultations associated with this action. The Navy also coordinated with the Advisory Council on Historic Preservation, who declined to participate in the formal Section 106 process unless requested to do so.

### 2 Proposed Action and Alternatives

#### 2.1 Proposed Action

The Navy proposes to provide a bridge to carry Tisdale Road traffic over Gambo Creek at NSF Dahlgren. Gambo Creek Bridge (#158), the existing bridge, is a reinforced concrete structure that was built in 1940 primarily as a railroad trestle for the movement of 16-inch guns mounted on flatcars. When rail car movement was phased out, it became a vehicular bridge. The bridge spans 493 feet and has 120 wooden piles.

The proposed bridge would be constructed of steel pile foundations and a prestressed concrete spread box beam structure. It would be sized for two-way traffic and capable of supporting a minimum of a 50,500-pound (25.25-ton) truck, which is the heaviest vehicle in the fire department's fleet. The width of the bridge would be approximately 37 feet 6 inches. Although the height of the proposed bridge is unknown at this time, it would likely be similar to the height of the existing bridge, which is 13 feet 3 inches from the bottom of concrete pier (pile caps) to the top of concrete decking (approximately 15 feet above mean sea level). The bridge would meet FHWA engineering standards.

During construction, the bridge decking, decking beams, and columns would be demolished down to the wetland surface either at the pile caps or slightly below grade leaving the pile caps in place, depending on the elevation. Existing deteriorated pilings would not likely be removed due to the excessive force needed to pull them out; they would be cut at the mudline and left in place. The existing bridge has 26 bridge supports; the proposed bridge would have 7 new supports.

Proposed site improvements would include a bridge structure, steel piles, guardrails, concrete abutments, concrete wingwalls, and traffic-control fencing and gates. Site preparation would include the excavation and the temporary shoring for abutments and piers. During construction, cofferdams would be used when work below the waterline is required. The design of and materials for the cofferdam would be chosen during the bridge design. It is likely that steel beams would be driven into the mud; then corrugated steel or fiberglass panels would be used with a sealant to prevent water leaking through the corrugations at the fastener locations. For the purposes of this EA, it is assumed that cofferdams would be used to the extent necessary along portions of Gambo Creek and would not completely block flow during construction activities.

A temporary access road for construction would be built along with an approach roadway. A laydown area would be located on the western side of the existing bridge in an area used to house equipment; this area would be cleared for storage associated with the proposed bridge. The laydown area is approximately 78,400 square feet. This area consists mostly of gravel and mowed grass (see photograph, Figure 2-1); it does not overlap with wetlands, floodplains, or cultural sites, and it would not disturb nearby Installation Restoration (IR) Site 006.

The project site boundary for each alternative includes an area 100 feet north of the existing bridge to include land, surface water, wetlands, and IR Site 001 (an old bombing range). This area could be used to create a temporary construction road that would be accessed from the laydown area west of the bridge. The cofferdams would likely be installed in this region of Gambo Creek.



Figure 2-1 Photograph of Proposed Laydown Area

Any discharge of dredge or fill into jurisdictional wetlands under the Proposed Action would be mitigated in accordance with Section 404 of the Clean Water Act.

The current Gambo Creek Bridge has utility lines attached to the structure that include water, sanitary sewer, power lines, and telecommunication. Under the Proposed Action, the utility lines would be removed from the existing bridge. Utility lines include three-phase electrical lines and conduit; 6-inch cast iron drainage piping for the bridge deck storm drain; 25-pair telephone coaxial cable and jacketing; 100-pair telephone coaxial cable inside a rigid galvanized steel conduit; 2- to 8-inch galvanized steel conduits with sealed joints containing protected network fiber optic lines; 4-inch cast iron sanitary sewer force main; and 10-inch cast iron potable waterline with insulation and jacketing. Demolition and disposal of the existing utility lines is considered part of the Proposed Action since they are attached to the bridge structure. However, construction of new utility lines is not being considered as part of the Proposed Action. The utility lines meed to be replaced regardless of whether a new bridge would be constructed. The new utility lines will be relocated underground, which will occur before construction would begin on the proposed bridge.

This area of the installation has the potential for some unexploded ordnance (UXO) underneath the surface. Areas that have not been previously disturbed must be scanned and cleared of UXO before the ground can be excavated. The region north of the current bridge location would need exploratory sweeping to determine the extent of UXO present.

Construction activities are anticipated to begin in fiscal year 2021. Depending on the alternative selected, the bridge would be closed either intermittently or continuously for approximately two years

during construction activities, and traffic would be diverted. Tisdale Road, which leads to the Gambo Creek Bridge, would be closed between River Bank Road (on the western side) and Small Caliber Drive (on the eastern side) to vehicle traffic. The detour route during construction would divert traffic around using Caskey Road, Bennion Road, Blandy Boulevard near B-Gate, and around to the C-Gate Area (e.g., Buildings 1480, 1490, 1450, 1450T, 1452, 1470, and 1480).

#### 2.2 Screening Factors

NEPA's implementing regulations provide guidance on the consideration of alternatives to a federally proposed action and require rigorous exploration and objective evaluation of reasonable alternatives. Only those alternatives determined to be reasonable and to meet the purpose and need require detailed analysis.

Potential location alternatives that meet the purpose and need were evaluated against the following screening factors:

- The bridge must be aligned to connect Tisdale Road on both sides of Gambo Creek.
- The bridge should not be on a curved horizontal alignment.
- The bridge should not be located in a sump (low point) in the roadway profile as bridge deck sumps result in an area where water collects and can lead to safety and maintenance issues.
- The location should have a low potential for unexploded ordnance (UXO).
- The excavation of undisturbed, natural habitat should be limited to the extent possible.

Various alternatives were evaluated against the screening factors. The alternatives considered for detailed analysis that meet the above screening criteria include:

- No Action Alternative
- Existing Bridge Alignment (Alternative 1, the Navy's Preferred Alternative)
- Southern Bridge Alignment (Alternative 2)
- Parallel Bridge Alignment (Alternative 3)

#### 2.3 Alternatives Carried Forward for Analysis

Based on the reasonable alternative screening factors and meeting the purpose and need for the Proposed Action, three action alternatives were identified and are analyzed within this EA. Summaries of the maximum estimated areas for each action alternative are shown in Table 2-1.

Project Component	Alternative 1: Existing Bridge Alignment (Preferred Alternative)	Alternative 2: Southern Bridge Alignment	Alternative 3: Parallel Bridge Alignment
Bridge Demolition	8,730	8,730	No change
New Bridge	20,100	20,100	9,980
Area of Disturbance	80,080	131,340	117,520
Land Disturbance	4,880	55,820	47,330
Increase in Impervious Surface	2,920	30,040	22,210
Surface Water	11,330	13,450	12,480
Wetland Disturbance <sup>1</sup>	63,860	75,520	70,190
Tree Loss	3,340	10,790	8,290

Table 2-1	Summary of Calculations for Action Alternatives
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Notes: All projects sizes are in square feet. Project sizes were primarily estimated using GIS data. No design plans are available, so these numbers are approximations only. <sup>1</sup>Wetland disturbance includes temporary impacts.

#### 2.3.1 No Action Alternative

Under the No Action Alternative, the Proposed Action would not occur. This alternative consists of continued use of the current bridge with minimal maintenance. Due to continued deterioration and resulting weight limit restrictions, fire department vehicle use is prohibited, which negatively affects emergency response times (as discussed in Section 1.4).

The deterioration of the bridge deck and support components would continue under the No Action Alternative, ultimately resulting in bridge failure and eventual closure. This would pose a higher level of risk for life and property in the event of an emergency. In addition, critical research, development, test, and evaluation (RDT&E) missions, facilities, and operations would also be exposed to increased risk from the failure of electric power and water supply lines. Structural failure would also result in the loss of utility services to various portions of the installation. The No Action Alternative would not meet the purpose of and need for the Proposed Action; however, the No Action Alternative is carried forward for analysis in this EA to establish a comparative baseline for analysis.

#### 2.3.2 Alternative 1: Existing Bridge Alignment (Preferred Alternative)

Under Alternative 1, the existing bridge would be completely demolished and then rebuilt on the existing footprint. Demolition would include the bridge deck, deck beams and columns, spandrel columns and structure, and concrete pier footing. The timber piles would be cut at the mudline to keep Gambo Creek flowing as normally as possible due to tidal surges.

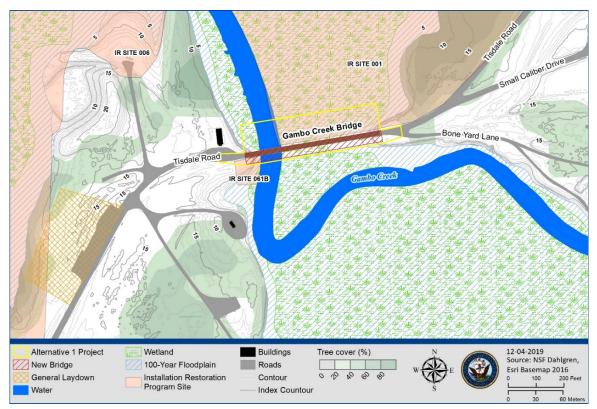
Building the new bridge on the same footprint would ensure that the alignment requirements discussed in Section 2.2 would be met. This would minimize the amount of roadwork needed on either side of the bridge since it is the straightest line connecting Tisdale Road. The bridge would be built to carry two-way traffic and capable of supporting a 50,500-pound truck, at a minimum. The Alternative 1 bridge alignment is shown Figure 2-2 and Figure 2-3.

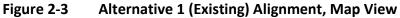
Approximately 10,600 cubic feet of soil would be excavated, and 141,300 cubic feet of fill material would be brought to the site. The new bridge would be outside IR Site 001, which is north of the existing bridge, though temporary activities for construction access could occur in this site as described in Section 2.1. IR Site 061B, which is adjacent to Tisdale Road and the existing bridge, is closed and has no development restrictions.

As previously mentioned, this area of the installation has the potential for some UXO below the surface. However, using the same bridge footprint would minimize the need for UXO clearance.



Figure 2-2 Alternative 1 (Existing) Alignment, Aerial View





#### 2.3.3 Alternative 2: Southern Bridge Alignment

Under Alternative 2, the bridge would be built to the south of the existing footprint. The demolition of the bridge would be completed as discussed under Alternative 1. The new bridge would be constructed to the specifications outlined in Section 2.1. Once the new bridge is completed, the existing bridge would be demolished, leaving the existing bridge operational during the majority of construction. The new southern alignment would require additional roadwork on both sides of the approach to the bridge. Laydown and construction access roads would be the same as described in Section 2.1.

Since this footprint has not been previously disturbed, Alternative 2 would require more scanning and clearance of UXO as compared to Alternative 1. In addition, there would be impacts on wetlands and cultural resources. The Alternative 2 bridge alignment is shown in Figure 2-4 and Figure 2-5 (note that locations of archaeological resources are sensitive and not public information).



Figure 2-4 Alternative 2 (Southern) Alignment, Aerial View

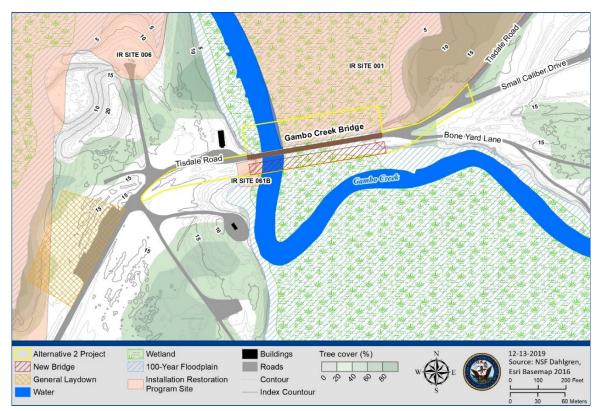


Figure 2-5 Alternative 2 (Southern) Alignment, Map View

#### 2.3.4 Alternative 3: Parallel Bridge Alignment

Under Alternative 3, the existing bridge would not be demolished. The existing bridge would be repaired, and a parallel bridge would be built to the south of the existing footprint (shown in Figure 2-6 and Figure 2-7), which is similar to the alignment for Alternative 2. Laydown and construction access roads would be the same as described in Section 2.1. The width of the existing bridge would not be expanded, and the new bridge to the south would have the width of a single lane. The resulting parallel bridge configuration would allow traffic to cross Gambo Creek in both directions at the same time, with a separate bridge for each direction of traffic flow.

Given the advanced state of deterioration present on the existing bridge, it cannot be feasibly repaired to return it to its original weight limits. Consequently, the current weight restrictions that prohibit fire trucks from crossing the bridge would not be lifted. However, fire trucks would be able to use the new bridge to the south in one direction with contraflow lane reversal when traveling between the northern and southern parts of Mainside. It is anticipated that extensive repairs would be needed every ten years to keep the current bridge usable.

Similar to Alternative 2, the new southern bridge would require additional roadwork on both sides of the approach. In addition, the area would need to be scanned for UXO, and there would be impacts on wetlands and cultural resources.



Figure 2-6 Alternative 3 (Parallel) Alignment, Aerial View

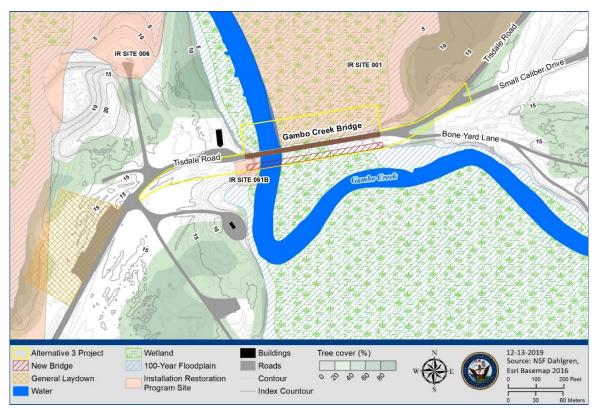


Figure 2-7 Alternative 3 (Parallel) Alignment, Map View

#### 2.4 Alternatives Considered but not Carried Forward for Detailed Analysis

The following alternatives were considered, but not carried forward for detailed analysis in this EA as they did not meet the project's purpose and need, nor did they satisfy the reasonable alternative screening factors presented in Section 2.2.

#### 2.4.1 Restoration and Modernization Alternative

Under this alternative, the existing bridge would be repaired to extend its life by five to ten years. However, due to the current advanced state of deterioration, the bridge could not be restored to meet the vehicle weight limits that the installation's missions require. Therefore, the fire department trucks would not be allowed to cross the bridge in either direction even after the repairs were made. This alternative does not meet the project's purpose and need. As a result, this alternative was considered but is not being carried forward for detailed analysis in the EA.

#### 2.4.2 Northern Bridge Alignment Alternative

Under this alternative, the bridge would be built to the north of the existing footprint, and the existing bridge would be demolished. There are several factors in the area of the northern alignment that are not conducive for a vehicle bridge. A building is currently being used within the roadway approach on the western side of Gambo Creek that would require sharp turns on the approach and departure to the bridge or demolition and relocation of that function. As shown in Figure 2-3, Figure 2-5, and Figure 2-7, IR Site 001—an old bombing range—is north of the existing bridge. Remediation activities at this contaminated site have been deferred while test ranges are still operational, and soil contaminants within IR Site 001 would require remediation and cleanup prior to any development. Furthermore, this area has not had previous UXO sweeps and could contain munitions and explosive concerns. For these reasons, this alternative is not being carried forward for detailed analysis in the EA.

#### 2.5 Best Management Practices Included in Proposed Action

This section presents an overview of the BMPs that are incorporated into the Proposed Action. BMPs are existing policies, practices, and measures that the Navy would adopt to reduce the environmental impacts of designated activities, functions, or processes. Although BMPs mitigate potential impacts by avoiding, minimizing or reducing/eliminating impacts, BMPs are distinguished from potential mitigation measures because BMPs are: (1) existing requirements for the Proposed Action; (2) ongoing, regularly occurring practices; or (3) not unique to this Proposed Action. In other words, the BMPs identified in this document are inherently part of the Proposed Action and are not potential mitigation measures proposed as a function of the NEPA environmental review process for the Proposed Action. Table 2-2 includes a list of BMPs.

Best Management Practice	Description and Examples	Impacts Reduced/Avoided
Construction equipment	Good housekeeping measures for construction equipment containing petroleum, oil, and/or lubricants, and minimizing sediment transport.	Prevent leeching of construction-related contaminants into groundwater and surface water.
Construction materials	Minimize heavy equipment within wetlands; not storing or fueling non- fixed construction equipment in wetlands; using construction mats to minimize impacts on wetlands soils.	Lessen impacts on wetlands from construction materials.
Erosion and sediment control	Appropriate scheduling and sequencing of construction, silt-fencing, covering soil stockpiles, watering exposed areas, managing wastes (such as construction materials, garbage, and debris) on-site during construction, storing and handling all petroleum products in contained areas, ensuring construction equipment is in good working order and not leaking any fluids before operation.	
In-water sediment controls	Turbidity curtains or other in-water measure to limit sediment disturbance to construction site.	Minimize turbidity in water bodies.
Stormwater control	Deep sump catch basins and oil/water separators for the new bridge are examples of controls that could be installed.	Minimize stormwater runoff and improve water quality.
Underwater noise minimization	Incorporate noise reduction during the project design phase, in accordance with regulations and consultation with NOAA Fisheries Habitat Conservation Division; modify timing and duration of pile- driving to occur outside of spawning season (March–May).	Minimize acoustic impacts on marine species.
Construction phasing	Conduct tree removal outside of northern long-eared bat, tri-colored bat, and little brown bat pup season (June 1– July 31). Review vegetation clearing through the Comprehensive Work Approval Process to minimize impacts on monarch butterfly. Review wetland disturbances and in- water work through the Comprehensive Work Approval Process to minimize impacts on northern red-bellied cooter and spotted turtle.	Minimize potential impacts on monarch butterfly, northern red-bellied cooter, spotted turtle, tri-colored bat and little brown bat (both under review for Endangered Species Act listing), and northern long-eared bat (federally threatened species).

Table 2-2	Best Management Practices
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# **3** Affected Environment and Environmental Consequences

This chapter presents a description of the environmental resources and baseline conditions that could be affected from implementing any of the alternatives and an analysis of the potential direct and indirect effects of each alternative.

All potentially relevant environmental resource areas were initially considered for analysis in this EA. In compliance with NEPA, CEQ, and Navy guidelines, the discussion of the affected environment (i.e., existing conditions) focuses only on those resource areas potentially subject to impacts. In addition, the level of detail used in describing a resource is commensurate with the anticipated level of potential environmental impact.

"Significantly," as used in NEPA, requires considerations of both context and intensity. Context means that the significance of an action must be analyzed in several contexts such as society as a whole (e.g., human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of a proposed action. For instance, in the case of a site-specific action, significance would usually depend on the effects in the locale rather than in the world as a whole. Both short- and long-term effects are relevant. Intensity refers to the severity or extent of the potential environmental impact, which can be thought of in terms of the potential amount of the likely change. In general, the more sensitive the context, the less intense a potential impact needs to be in order to be considered significant. Likewise, the less sensitive the context, the more intense a potential impact would be expected to be significant.

Chapter 3 discusses in detail air quality, water resources, geological resources, cultural resources, biological resources, infrastructure, and hazardous materials and wastes.

The potential impacts on the following resource areas are considered to be negligible or non-existent, so they were not analyzed in detail in this EA:

Land Use: The Proposed Action would replace or modify a deteriorating bridge. There would be no long-term change in functional land use at NSF Dahlgren. Therefore, land use is not analyzed in detail.

**Visual Resources:** Under the Proposed Action, a new bridge or repaired bridge could change the viewshed of NSF Dahlgren but would not degrade the visual character of the installation. The existing bridge is deteriorating; if left as-is, the bridge would continue to degrade and would be a visual detraction. A new bridge would be constructed using similar materials, such as steel and concrete (see Figure 3-1). Potential visual impacts on historic resources are discussed in Section 3.4, Cultural Resources. Therefore, visual impacts are not analyzed in detail.



Figure 3-1 Photo of Gambo Creek Bridge Looking Northeast

**Airspace:** The Proposed Action would not interfere with airspace use at any point during or after construction. Therefore, airspace is not analyzed in detail.

**Noise:** An assessment of noise includes sources and associated sensitive receptors. The Proposed Action would cause temporary increases in noise levels from construction and/or demolition activities. The ambient noise environment at NSF Dahlgren includes sources such as ordnance tests from small-arms firing, large-caliber-gun firing, and explosive detonations, and from aircraft overflights from helicopters and unmanned aerial vehicles. Gambo Creek Bridge is within an active range area where the Day-Night Average Sound Level noise contours show that noise levels are greater than 70 C-weighted decibels, which are adjusted to account for the frequency weighting produced by ordnance and include penalties for increased noise during nighttime hours (Navy, 2013). There are no noise-sensitive human populations or land uses permitted within this area; therefore, considering the high levels of existing ambient noise, short-term increases from construction noise would not be significant. The Proposed Action would not change long-term noise levels. Therefore, noise effects on human populations are not analyzed in detail.

Potential underwater noise effects on biological resources are discussed in more detail in Section 3.5.

**Transportation:** The Proposed Action would result in short-term, localized increases in constructionrelated traffic accessing the laydown area and the Gambo Creek Bridge vicinity. Large construction equipment would be transported to the site and generally remain for the duration of construction. Other equipment, such as heavy trucks for hauling construction/demolition and delivering construction materials, would arrive more frequently, depending on the intensity of construction. On average, one to several trucks would be expected each day, though truck numbers would be higher during the initial site preparation phase. Construction workers would also arrive to and from the installation each day. Shortterm, construction-related traffic would only occur while these activities are on-going and would not contribute to long-term changes in transportation volume at NSF Dahlgren.

As discussed in Section 2.1, construction would last approximately two years. During that time, Tisdale Road would be closed either intermittently or continuously, depending on the alternative. Figure 3-2 shows the detour routes that would be followed when Tisdale Road/Gambo Creek Bridge is closed during construction. The route using the northern bridge across Gambo Creek is often restricted due to range and explosive operations, so it would not always be available. The longer route would be available for all vehicles. Traffic along these detour routes would temporarily increase while Tisdale Road traffic is being diverted. A Transportation Improvement Plan was completed for NSF Dahlgren in 2012. An internal arterial analysis was completed at Caskey Road, south of Bennion Road, which is part of the roadway that would be used for the detour route. Level of service B was observed during both the AM and PM peak hours at Caskey Road, south of Bennion (NAVFAC Washington, 2012). Level of service B is considered stable traffic flow with a high degree of freedom to select speed and operating conditions but with some influence from other users (VDOT, 2019). In addition, the detour route is entirely within the installation boundary. As a result, short-term road closures and diversions would result in no long-term changes in transportation volume.

The Proposed Action would be expected to improve transportation systems in the long term. While the existing Gambo Creek Bridge is a two-lane road, it is often treated as a one-lane road because of the narrow width. Furthermore, weight restrictions limit the vehicles that can traverse the bridge. The proposed bridge would provide for two-way traffic and permit vehicles up to 25.25 tons. Overall, these improvements would be beneficial in the long term but not significant for transportation.

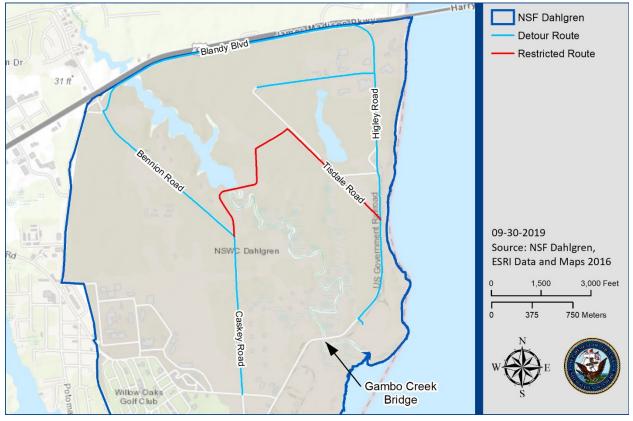


Figure 3-2 Temporary Detour Routes

**Public Health and Safety:** The Proposed Action is entirely within the boundaries of NSF Dahlgren and partially within an active range. This area is heavily restricted from the public, and Tisdale Road would be closed to through traffic while the road is undergoing active construction, or when the bridge structure is not passable. Gambo Creek Bridge is within an active range, and there are numerous explosive safety quantity distance arcs throughout the entire project site associated with munitions use and storage. These safety concerns are the same among all the alternatives, and there would be no change in range or explosive safety operations or restrictions.

Due to its location within a range and within various explosive safety arcs, construction activities would be coordinated with Range Operations to ensure that workers would not be present when the range is live. Work at the project site is allowable without further consultation or approvals (Shifflette, 2019). All explosive safety protocol would be followed to ensure a safe construction environment from operational risks.

Construction activities increase short-term safety risks. Contractors performing construction activities would be required to prepare and follow safety protocols appropriate for specific construction and demolition tasks, and to comply with applicable worker safety laws.

In the long term, a new bridge would enhance roadway safety by providing a wider roadway that meets applicable standards. Furthermore, the new bridge would not have the same weight restrictions, allowing fire trucks and other heavy vehicles to use the bridge; the shorter response times for emergency vehicles would also improve installation safety. Therefore, public health and safety is not analyzed in detail.

Impacts associated with special hazards, hazardous wastes, and potential contamination are discussed in Section 3.7, Hazardous Materials and Wastes.

**Socioeconomics:** The Proposed Action would result in short-term, minor expenditures from construction activities. Construction activities would have no long-lasting effects on the local economy. The Proposed Action would not change the number of personnel employed at NSF Dahlgren. Therefore, socioeconomics is not analyzed in further detail.

**Environmental Justice:** King George County is in the 41st (state) and 28th (national) percentiles for lowincome populations and 41st (state) and 46th (national) percentiles for minority populations (USEPA, 2018). These levels do not meet the U.S. Environmental Protection Agency's (USEPA) recommended threshold of the 80th percentile for further assessing at-risk populations for environmental justice concerns (USEPA, 2016). The Proposed Action would not disproportionately affect minorities or economically disadvantaged populations protected under Executive Order (EO) 12898, *Environmental Justice for Low Income and Minority Populations*. Therefore, environmental justice is not analyzed in detail.

# 3.1 Air Quality

This discussion of air quality includes criteria pollutants, standards, sources, permitting, and greenhouse gases (GHGs). Air quality in a given location is defined by the concentration of various pollutants in the atmosphere. A region's air quality is influenced by many factors, including the type and amount of pollutants emitted into the atmosphere, the size and topography of the air basin, and the prevailing meteorological conditions.

Most air pollutants originate from human-made sources, including mobile sources (e.g., cars, trucks, buses), stationary sources (e.g., factories, refineries, power plants), and indoor sources (e.g., some building materials and cleaning solvents). Air pollutants can also be released from natural sources such as forest fires.

# 3.1.1 Regulatory Setting

# 3.1.1.1 Criteria Pollutants and National Ambient Air Quality Standards

The principal pollutants defining the air quality, called "criteria pollutants," include carbon monoxide, sulfur dioxide, nitrogen dioxide, ozone, suspended particulate matter less than or equal to 10 micrometers in diameter (PM<sub>10</sub>), fine particulate matter less than or equal to 2.5 micrometers in diameter (PM<sub>2.5</sub>), and lead. Carbon monoxide, sulfur dioxide, lead, and some particulates are emitted directly into the atmosphere from emissions sources. Ozone, nitrogen dioxide, and some particulates are formed through atmospheric chemical reactions that are influenced by weather, ultraviolet light, and other atmospheric processes.

Under the Clean Air Act, USEPA has established National Ambient Air Quality Standards (NAAQS) (40 Code of Federal Regulations [CFR] part 50) for criteria pollutants. NAAQS are classified as primary or secondary. Primary standards protect against adverse health effects; secondary standards protect against welfare effects, such as damage to farm crops and vegetation and damage to buildings. Some pollutants have long-term and short-term standards. Short-term standards are designed to protect against acute health effects, while long-term standards were established to protect against chronic health effects.

Areas that are and have historically complied with the NAAQS are designated as attainment areas. Areas that violate a federal air quality standard are designated as nonattainment areas. Areas that have transitioned from nonattainment to attainment are designated as maintenance areas and are required to adhere to maintenance plans to ensure continued attainment.

The Clean Air Act requires states to develop a general plan to attain and maintain the NAAQS in all areas of the country and a specific plan to attain the standards for each area designated nonattainment for a NAAQS. These plans, known as State Implementation Plans, are developed by state and local air quality management agencies and submitted to USEPA for approval.

In addition to the NAAQS for criteria pollutants, national standards exist for hazardous air pollutants, which are regulated under Section 112(b) of the 1990 Clean Air Act Amendments. The *National Emission Standards for Hazardous Air Pollutants* regulate hazardous air pollutant emissions from stationary sources (40 CFR part 61).

# 3.1.1.2 General Conformity

The USEPA General Conformity Rule applies to federal actions occurring in nonattainment or maintenance areas when the total direct and indirect emissions of nonattainment pollutants (or their precursors) exceed specified thresholds. King George County is unclassified or in attainment for all criteria pollutants (USEPA, 2019). Therefore, the General Conformity Rule does not apply to this project, and a Record of Non-Applicability is not required; General Conformity is not further discussed in this EA.

# 3.1.1.3 Permitting

# New Source Review (Preconstruction Permit)

New projects located at stationary sources and modifications at existing stationary sources are required by the Clean Air Act to evaluate the need for, and potentially obtain, an air pollution permit before commencing construction. This permitting process for stationary sources is called a minor New Source Review (mNSR) permit and is required whether the new source or existing source modification is planned for nonattainment areas or attainment and unclassifiable areas. The Proposed Action would not involve any new or modified stationary air sources.

#### Title V (Operating Permit)

The Title V Operating Permit Program consolidates all Clean Air Act requirements applicable to the operation of a source. It applies to stationary sources of air pollution that exceed the major stationary source emission thresholds, as well as other non-major sources specified in a particular regulation. The program includes a requirement for payment of permit fees to finance the operating permit program whether implemented by USEPA or a state or local regulator. NSF Dahlgren does not have a Title V permit but does have a synthetic mNSR permit (Registration No. 40307), which contains state and federally enforceable conditions for operating stationary air sources. The Proposed Action would not involve any new or modified stationary air sources or result in changes in NSF Dahlgren's operating permit.

#### 3.1.1.4 Greenhouse Gases

GHGs are gas emissions that trap heat in the atmosphere. These emissions occur from natural processes and human activities. Scientific evidence indicates a trend of increasing global temperature over the past century due in part to an increase in GHG emissions from human activities. The climate change associated with this global warming is predicted to produce negative economic and social consequences across the globe. CEQ's most recent draft guidance on the consideration of GHGs states that a projection of a proposed action's direct and reasonably foreseeable indirect GHG emissions may be used as a proxy for assessing potential climate effects (CEQ, 2019). GHG emissions are standardized to carbon dioxide, which has a value of one. The carbon dioxide equivalent (CO<sub>2</sub>e) rate is calculated by multiplying the emissions of each GHG by its global warming potential and adding the results together to produce a single, combined emissions rate representing all GHGs.

#### 3.1.2 Affected Environment

NSF Dahlgren is within the Northeastern Virginia Intrastate Air Quality Control Region (40 CFR 81.144). The Virginia DEQ is responsible for implementing and enforcing state and federal air quality regulations. King George County is unclassified or in attainment for all criteria pollutants (USEPA, 2019).

The most recent emissions inventory for King George County is shown in Table 3-1. Volatile organic compound and nitrogen oxide emissions are used to represent ozone generation because they are precursors of ozone.

Table 3-1	King George County Air Emissions Inventory (2014)
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Location	NOx	VOC	CO	SO2	РМ10	РМ2.5
	(tpy)	(tpy)	(tpy)	(tpy)	(tpy)	(tpy)
King George County	1,273	5,455	4,830	158	1,512	305

Source: USEPA, 2014.

Key:  $NO_x$  = nitrogen oxides; VOC = volatile organic compound; CO = carbon monoxide;  $SO_2$  = sulfur dioxide;  $PM_{10}$  = suspended particulate matter less than or equal to 10 micrometers in diameter;  $PM_{2.5}$  = fine particulate matter less than or equal to 2.5 micrometers in diameter; tpy = tons per year.

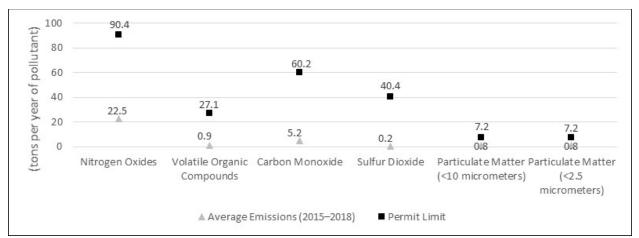
NSF Dahlgren's emissions are covered under a synthetic mNSR permit (Registration No. 40307) issued by Virginia DEQ. The permitted sources of criteria air pollutants at NSF Dahlgren include emissions from stationary sources supporting installation operations, such as boilers, generators, and other processes and equipment from paint booths and degreasers (Virginia DEQ, 2016). Recent annual criteria pollutants emissions and emissions limits for NSF Dahlgren are shown in Table 3-2. Criteria pollutant emissions are consistently well below permitted levels, as illustrated in Figure 3-3.

Year	NOx (tpy)	VOC (tpy)	CO (tpy)	SO2 (tpy)	РМ10 (tpy)	РМ2.5 (tpy)
2015	27.3	1.02	6.20	0.18	0.87	0.87
2016	17.9	0.73	4.21	0.25	0.77	0.77
2017	25.9	1.02	5.95	0.22	0.87	0.87
2018	18.8	0.63	4.44	0.17	0.77	0.77
Average, 2015–2018	22.5	0.85	5.20	0.21	0.82	0.82
Annual Facility-wide Limits	90.4	27.1	60.2	40.4	7.2	7.2

Table 3-2	Naval Support Facility Dahlgren Air Emissions Inventory (Stationary Sources)
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Sources: Virginia DEQ, 2016; NSASP, 2017; NSASP, 2018; Geil, 2019.

Key:  $NO_x$  = nitrogen oxides; VOC = volatile organic compound; CO = carbon monoxide;  $SO_2$  = sulfur dioxide;  $PM_{10}$  = suspended particulate matter less than or equal to 10 micrometers in diameter;  $PM_{2.5}$  = fine particulate matter less than or equal to 2.5 micrometers in diameter; tpy = tons per year.







CEQ's NEPA regulations require evaluation of the degree to which a proposed action affects public health (40 CFR 1508.27). Children, elderly people, and people with illnesses are especially sensitive to the effects of air pollutants; therefore, hospitals, schools, convalescent facilities, and residential areas are sensitive receptors for air quality impacts. Within and just beyond a one-mile radius from Gambo Creek Bridge, children attend Dahlgren Elementary School and two child development centers as well as live in military family housing on NSF Dahlgren, as shown in Figure 3-4. No hospitals, convalescent facilities, or other sensitive air receptors are within the immediate affected environment.

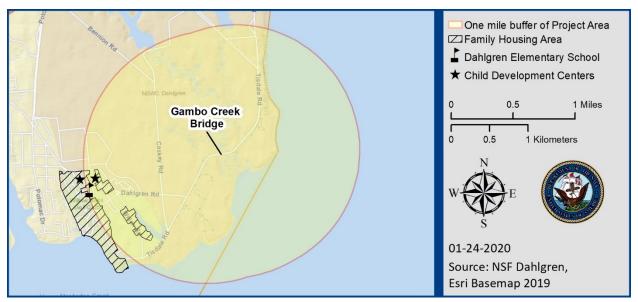


Figure 3-4 Sensitive Air Receptors within the Affected Environment

# 3.1.3 Environmental Consequences

Effects on air quality are based on estimated direct and indirect emissions associated with the action alternatives. The study area for assessing air quality impacts is King George County, which is in the Northeastern Virginia Intrastate Air Quality Control Region.

Estimated emissions from a proposed federal action are typically compared with the relevant national and state standards to assess the potential for increases in pollutant concentrations.

# 3.1.3.1 No Action Alternative

King George County has experienced growth in the recent past and is expected to continue to experience growth into the future. According to the King George Comprehensive Air Quality Potential Impacts:

- No Action: Minor regional increases from growth in the county. No significant impacts.
- Alternative 1: Short-term, minor emissions during construction. No significant impacts.
- Alternative 2: Short-term, minor emissions during construction. No significant impacts.
- Alternative 3: Short-term, minor emissions during construction. No significant impacts.

Plan, the County's population is expected to increase by 28 percent between 2010 and 2020 (Navy, 2013) and 58 percent between 2010 and 2030 (King George County Planning Commission, 2013). Population and economic growth could increase criteria pollutant emissions in the county and the Northeastern Virginia Intrastate Air Quality Control Region associated with new minor point sources and increased traffic, but these increases are not expected to result in NAAQS violations or noticeably diminish air quality due to the relatively rural setting of King George County. Under the No Action Alternative, the Proposed Action would not occur and would not contribute to any changes in baseline air quality. Therefore, no significant impacts on air quality or air resources would occur with implementation of the No Action Alternative.

# 3.1.3.2 Alternative 1: Existing Bridge Alignment (Preferred Alternative) Potential Impacts

Under Alternative 1, short-term, minor air emissions would result from operating heavy equipment during site preparation, construction, and demolition activities. No increases in long-term emissions would occur. Air emissions were not quantitatively estimated for Alternative 1, but criteria pollutant and GHG emissions would be below those estimated for Alternative 2, as described in Section 3.1.3.3, which would be minor. The project sites from Alternative 1 and 2 are comparable and both involve demolition activities. However, the proposed bridge for Alternative 1 would be constructed in place of the existing bridge, so less general site disturbance, grading, and new pavement and roadways would be required. Therefore, criteria pollutant and GHG emissions from Alternative 1 would be comparable to but slightly less than those described in Section 3.1.3.3 and Appendix C for Alternative 2, which would be short term and represent only a fraction of regional emissions. Implementation Alternative 1 would not result in significant impacts on air quality.

# 3.1.3.3 Alternative 2: Southern Bridge Alignment Potential Impacts

Under Alternative 2, short-term, minor air emissions would result from operating heavy equipment during site preparation, construction, and demolition activities. No increases in long-term emissions would be expected because there would be no changes in operations associated with the new bridge or stationary sources of air emissions. Estimated construction emissions are shown in Table 3-3. Appendix C contains more detailed information about project inputs and assumptions used in estimating air emissions.

Activity	NO <sub>x</sub> (tpy)	VOC (tpy)	CO (tpy)	SO₂ (tpy)	РМ10 (tpy)	РМ2.5 (tpy)
Total Construction (2 Years)	7.4	0.9	5.0	0.02	6.3	1.6
Construction Percent Increase over	0.6%	0.02%	0.1%	0.01%	0.4%	0.5%
Regional Emissions (refer to Table 3-1)						

Table 3-3	Estimated Air Emissions from Proposed Construction Activities
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Key:  $NO_x$  = nitrogen oxides; VOC = volatile organic compound; CO = carbon monoxide;  $SO_2$  = sulfur dioxide; PM<sub>10</sub> = suspended particulate matter less than or equal to 10 micrometers in diameter; PM<sub>2.5</sub> =fine particulate matter less than or equal to 2.5 micrometers in diameter; tpy = tons per year.

Air quality impacts from construction would occur from combustion emissions due to the use of fossil fuel-powered equipment and fugitive dust emissions (i.e., PM<sub>10</sub> and PM<sub>2.5</sub>) during earth-moving activities, construction, demolition, trenching, and the operation of equipment on bare soil. As this project is in the planning stages, a detailed construction schedule is not known; it is estimated that construction would begin in fiscal year 2021 and last approximately two years. Direct emissions from construction activities would include equipment combustion for on-site construction vehicles and ground disturbance. Indirect emissions from construction activities include equipment combustion from delivery and waste-removal trucks and construction workers commuting to and from the site.

The DEQ Air Division reviewed the Draft EA as part of this project's Federal Consistency Determination (see Appendix B), noting that regulations pertaining to open burning and fugitive dust emissions during construction could be applicable. The Navy would comply with all applicable air quality requirements. The following measures pertaining to fugitive dust control would be implemented during construction:

- use, where possible, water or chemicals for dust control
- install and use hoods, fans, and fabric filters to enclose and vent the handling of dusty materials
- cover open equipment for conveying materials
- promptly remove spilled or tracked dirt or other materials from paved streets and remove dried sediments from soil erosion

Construction activities would increase the concentration of criteria pollutants in the environment immediately surrounding the area of construction. Ambient air quality is generally good in and around NSF Dahlgren, and the estimated emissions from Alternative 2 would not be expected to noticeably diminish air quality or affect sensitive receptors, including Dahlgren Elementary School, child development centers, and military family housing areas. Projected emissions from construction activities would represent only minor regional increases within King George County (refer to Table 3-3) and would not violate any NAAQS. Therefore, implementation of Alternative 2 would not result in significant impacts on air quality from criteria pollutant emissions.

#### **Greenhouse Gases**

Implementation of Alternative 2 would contribute directly to emissions of GHGs from the combustion of fossil fuels. Construction and demolition activities would generate approximately 2,113 tons (1,917 metric tons) of CO<sub>2</sub>e distributed over the duration of project construction. These limited emissions would be a negligible contribution to regional GHG emissions. Therefore, implementation of Alternative 2 would not result in significant impacts on air quality from GHG emissions.

#### 3.1.3.4 Alternative 3: Parallel Bridge Alignment Potential Impacts

Under Alternative 3, short-term, minor air emissions would result from operating heavy equipment during site preparation, construction, and roadwork activities. No increases in long-term emissions would occur. Air emissions were not quantitatively estimated for Alternative 3 since the project sites of Alternatives 2 and 3 are comparable, but Alternative 3 does not involve demolition of the existing bridge. Overall, criteria pollutant and GHG emissions from Alternative 3 would be comparable to those described in Section 3.1.3.3 and Appendix C for Alternative 2, which would be short term and represent only a fraction of regional emissions. Therefore, implementation of Alternative 3 would not result in significant impacts on air quality.

# 3.2 Water Resources

This discussion of water resources includes groundwater, surface water, wetlands, and floodplains. This section discusses the physical characteristics of wetlands; wildlife and vegetation are addressed in Section 3.5, Biological Resources.

Groundwater is water that flows or seeps downward and saturates soil or rock, supplying springs and wells. Groundwater is used for water consumption, agricultural irrigation, and industrial applications. Groundwater properties are often described in terms of depth to aquifer, aquifer or well capacity, water quality, and surrounding geologic composition. Sole source aquifer designation provides limited protection of groundwater resources that serve as drinking water supplies.

Surface water resources generally consist of wetlands, lakes, rivers, and streams. Surface water is important for its contributions to the economic, ecological, recreational, and human health of a community or locale. A Total Maximum Daily Load is the maximum amount of a substance that can be assimilated by a water body without causing impairment. A water body can be deemed impaired if water quality analyses conclude that exceedances of water quality standards occur.

Wetlands are jointly defined by USEPA and USACE as "those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions." Wetlands generally include "swamps, marshes, bogs and similar areas."

Floodplains are areas of low-level ground present along rivers, stream channels, large wetlands, or coastal waters. Floodplain ecosystem functions include natural moderation of floods, flood storage and conveyance, groundwater recharge, and nutrient cycling. Floodplains also help to maintain water quality and are often home to a diverse array of plants and animals. In their natural vegetated state, floodplains slow the rate at which the incoming overland flow reaches the main water body. Floodplain boundaries are most often defined in terms of frequency of inundation, that is, the 100-year and 500-year flood. Floodplain delineation maps are produced by the Federal Emergency Management Agency and provide a basis for comparing the locale of the Proposed Action to floodplains.

#### 3.2.1 Regulatory Setting

The Safe Drinking Water Act is the federal law that protects public drinking water supplies throughout the nation. Under the Safe Drinking Water Act, the USEPA sets standards for drinking water quality. Groundwater quality and quantity are regulated under several statutes and regulations, including the Safe Drinking Water Act.

The Clean Water Act establishes federal limits, through the National Pollutant Discharge Elimination System (NPDES) program, on the amounts of specific pollutants that can be discharged into surface waters to restore and maintain the chemical, physical, and biological integrity of the water. The NPDES program regulates the discharge of point (i.e., end of pipe) and nonpoint sources (i.e., stormwater) of water pollution.

The Virginia NPDES stormwater program requires construction site operators engaged in clearing, grading, and excavating activities that disturb one acre or more to obtain coverage under an NPDES Construction General Permit for stormwater discharges. Construction or demolition that necessitates an individual permit also requires preparation of a Notice of Intent to discharge stormwater and a stormwater pollution prevention plan (SWPPP) that is implemented during construction. As part of the 2014 Final Rule for the Clean Water Act, titled *Effluent Limitations Guidelines and Standards for the Construction and Development Point Source Category*, activities covered by this permit must implement non-numeric erosion and sediment controls and pollution prevention measures.

Wetlands are currently regulated by USACE under Section 404 of the Clean Water Act as a subset of all "Waters of the United States." Waters of the United States are defined as (1) traditional navigable waters, (2) wetlands adjacent to navigable waters, (3) non-navigable tributaries of traditional navigable waters that are relatively permanent where the tributaries typically flow perennially or have continuous flow at least seasonally (e.g., typically three months), and (4) wetlands that directly abut such tributaries under Section 404 of the Clean Water Act, as amended, and are regulated by USEPA and USACE. The Clean Water Act requires that Virginia establish a Section 303(d) list to identify impaired waters and establish Total Maximum Daily Loads for the sources causing the impairment.

Section 404 of the Clean Water Act authorizes the Secretary of the Army, acting through the Chief of Engineers, to issue permits for the discharge of dredge or fill into wetlands and other Waters of the United States. Any discharge of dredge or fill into Waters of the United States requires a permit from USACE.

Section 438 of the Energy Independence and Security Act establishes stormwater design requirements for development and redevelopment projects. Under these requirements, federal facility projects larger than 5,000 square feet must "maintain or restore, to the maximum extent technically feasible, the predevelopment hydrology of the property with regard to the temperature, rate, volume, and duration of flow."

Section 9 of the Rivers and Harbors Act is administered by USCG and provides for permit requirements for any bridge, dam, dike, or causeway in or over any navigable water of the United States. Approval of location and plans by USCG is required for bridge construction.

EO 11990, *Protection of Wetlands*, requires that federal agencies adopt a policy to avoid, to the extent possible, long- and short-term adverse impacts associated with destruction and modification of wetlands and to avoid the direct and indirect support of new construction in wetlands whenever there is a practicable alternative.

EO 11988, *Floodplain Management*, requires federal agencies to avoid to the extent possible the longand short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct and indirect support of floodplain development unless it is the only practicable alternative. Flood potential of a site is usually determined by the 100-year floodplain, which is defined as the area that has a one percent chance of inundation by a flood event in a given year. The Chesapeake Bay Preservation Act, enacted by the Virginia General Assembly in 1988, is designed to improve water quality in the Chesapeake Bay and other waters of the state by requiring the use of effective land management and land use planning to reduce and prevent nonpoint source pollution. King George County is responsible for the designation of Chesapeake Bay Preservation Areas within the county based on the presence of perennial streams in order to protect the areas and the quality of water in the Chesapeake Bay.

Through the Coastal Zone Management Act of 1972 (CZMA), Congress established a national policy to preserve, protect, develop, restore, or enhance resources in the coastal zone. The CZMA encourages coastal states to properly manage use of their coasts and coastal resources, prepare and implement coastal management programs, and provide for public and governmental participation in decisions affecting the coastal zone. To this end, the CZMA imparts an obligation upon federal agencies whose actions or activities affect any land, water use, or natural resource of the coastal zone to be carried out in a manner consistent to the maximum extent practicable with the enforceable policies of federally approved state coastal management programs. Federal lands, which are "lands the use of which is by law subject solely to the discretion of the Federal Government, its officers, or agents," are statutorily excluded from a state's "coastal uses or resources." If, however, the proposed federal activity affects coastal uses or resources beyond the boundaries of the federal property (i.e., has spillover effects), the CZMA Section 307 federal consistency requirement applies. As a federal agency, the Navy is required to determine whether its proposed activities would affect the coastal zone and for consistency with Virginia's Coastal Zone Management Program. This takes the form of a consistency determination, a negative determination, or a determination that no further action is necessary. King George County is within Virginia's coastal zone and Gambo Creek is considered a Chesapeake Bay Preservation Area, necessitating a Federal Consistency Determination (Appendix B).

#### 3.2.2 Affected Environment

The following discussions provide a description of the existing conditions for each of the categories under water resources at NSF Dahlgren.

#### 3.2.2.1 Groundwater

The principal producing, confined aquifer underlying NSF Dahlgren is the Potomac Group Artesian Aquifer Formation, which is composed of three aquifers and three confining units known collectively as the Potomac Formation. The Potomac Formation is composed of the upper, middle, and lower Potomac aquifers. It is mostly confined and yields between 100 and 1,500 gallons per minute. The wells at NSF Dahlgren draw from the upper Potomac Group Artesian Aquifer, and static water level on the base ranges from 116 feet to 123 feet below ground surface, with a yield of approximately 350 gallons per minute (Wray, 2013).

#### 3.2.2.2 Surface Water

NSF Dahlgren Mainside is situated on approximately 4.2 miles of shoreline along the western bank of the Potomac River and the northern bank of the Upper Machodoc Creek. These waters eventually flow into the Potomac River, and subsequently the Chesapeake Bay, which is located at the mouth of the Potomac River, approximately 44 miles downstream.

Gambo Creek flows through Mainside from northwest to southeast, dividing Mainside into two approximately equal sections, and empties into the Potomac River. Gambo Creek is tidally influenced as far inland as the northern border of the installation (Wray, 2013). Upper Machodoc Creek splits the

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NSF Dahlgren property between Mainside and the EEA and flows into the Potomac River. Many small, unnamed tributaries of Upper Machodoc Creek and Gambo Creek also flow through Mainside.

#### 3.2.2.3 Wetlands

Wetlands at NSF Dahlgren Mainside are primarily associated with the Potomac River, Upper Machodoc Creek, Gambo Creek, and unnamed tributaries to these waterways. Wetlands outside the installation's boundaries are of similar type and distribution as those found within.

Estuarine and palustrine wetlands, as classified under the Cowardin system (Cowardin, Carter, Golet, & LaRoe, 1979), cover approximately 608 acres (14 percent) of NSF Dahlgren. Installation wetlands are mostly estuarine intertidal, palustrine forested, and estuarine subtidal wetlands. Table 3-4 provides a summary of the extent of wetlands on NSF Dahlgren, and Figure 3-5 provides a visual representation of wetlands located on NSF Dahlgren Mainside.

The wetlands in the vicinity of the Gambo Creek Bridge are classified as estuarine intertidal persistent emergent wetlands, irregularly flooded; estuarine subtidal unconsolidated bottom, subtidal; and estuarine intertidal unconsolidated shore, irregularly flooded (Marstel-Day and Versar, 2020). Estuarine wetland systems consist of deepwater tidal habitats and adjacent tidal wetlands that are usually semienclosed by land but have sporadic access to ocean waters, and with occasional freshwater runoff from the land. Intertidal wetlands are within the substrate that is exposed and flooded by tides. Persistent emergent wetlands are characterized by vegetation that is present for most of the growing season, subject to temporary to permanent flooding at the base (Cowardin, Carter, Golet, & LaRoe, 1979).

Wetland Type	Wetlands Delineated Near Proposed Action (acres)	Wetlands on Installation (acres)	Percentage of Installation
Estuarine Subtidal	0.47 <sup>1</sup>	90	2.1%
Estuarine Intertidal	2.21 <sup>2</sup>	278	6.4%
Palustrine Emergent	—	18	0.4%
Palustrine Forested	-	183	4.2%
Palustrine Shrub	-	9	0.2%
Palustrine Unconsolidated Bottom	-	30	0.7%
Total Wetlands	2.68	608	14%

Table 3-4Wetlands at Naval Support Facility Dahlgren

Sources: Wray, 2013; Marstel-Day and Versar, 2019.

Notes: <sup>1</sup>Estuarine subtidal was delineated as estuarine subtidal unconsolidated bottom wetlands.

<sup>2</sup>Estuarine intertidal persistent emergent, irregularly flooded wetlands account for 2.03 acres, and estuarine intertidal unconsolidated shore, irregularly flooded wetlands account for 0.18 acres.

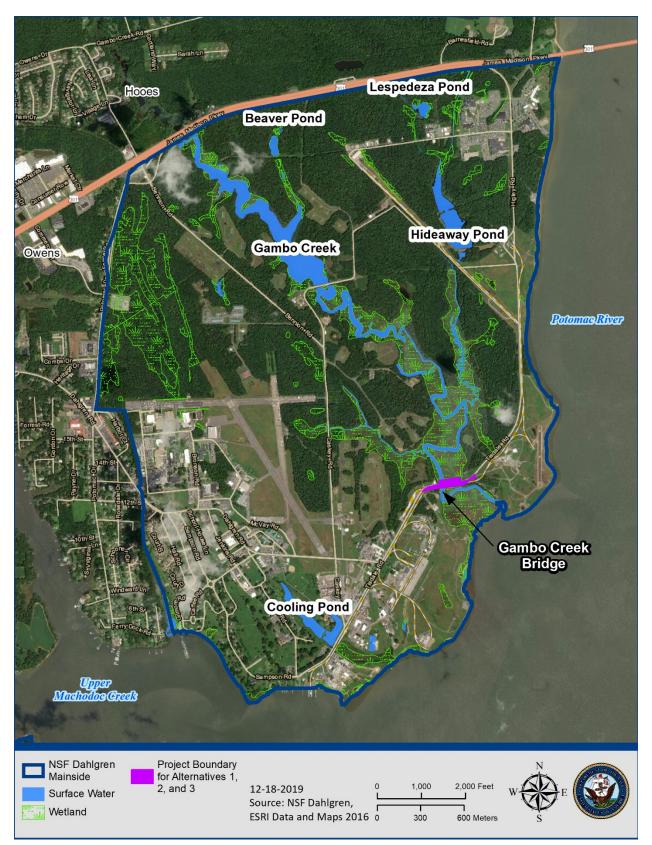


Figure 3-5 Surface Water and Wetlands on Naval Support Facility Dahlgren Mainside

A wetland delineation was conducted in the vicinity of the Proposed Action; a total of 116,741 square feet (2.68 acres) of wetlands were identified within the Gambo Creek Bridge wetland delineation area. Over three-quarters of this total (88,427 square feet; 2.03 acres) is estuarine intertidal persistent emergent wetland, irregularly flooded, which occurred along the shoreline on either side of Gambo Creek. Figure 3-6 shows the wetlands that were delineated and classified at the site. The estuarine subtidal unconsolidated bottom, subtidal wetland (20,473 square feet; 0.47 acres) was mapped within the Gambo Creek channel, and estuarine intertidal unconsolidated shore, irregularly flooded wetland (7,841 square feet; 0.18 acres) was mapped under the Gambo Creek Bridge where vegetation does not grow (Marstel-Day and Versar, 2020). Table 3-4 summarizes the delineated wetland acreages near the Proposed Action.

The wetlands adjacent to Gambo Creek near the Proposed Action are subject to the ebb and flow of tides. Gambo Creek is a relatively permanent water body that flows directly to the Potomac River, which is a traditional navigable water. Therefore, all the wetlands delineated near the Proposed Action are presumed to be jurisdictional to USACE. USACE reviewed and approved the wetland delineation of the project site under a Preliminary Jurisdictional Determination (see Appendix B).

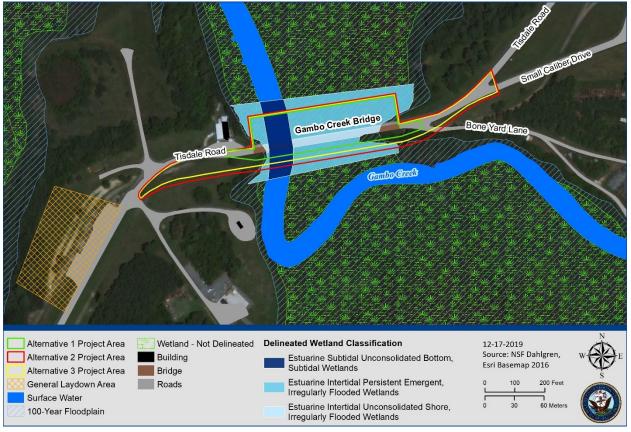


Figure 3-6 Surface Water, Wetlands, and Floodplain at Gambo Creek Bridge

#### 3.2.2.4 Floodplains

The Federal Emergency Management Agency defines floodplains by the likelihood that a given area will be flooded in a year: a 100-year floodplain is an area that has a 1 percent chance of flooding in any given year, and a 500-year floodplain has a 0.2 percent chance annually. The 100-year floodplain includes some land areas that are flooded by small, often dry watercourses.

Federal Emergency Management Agency National Flood Insurance Program data show that NSF Dahlgren Mainside has approximately 391 acres that are within the 100-year floodplain, the majority of which is located on either side of Gambo Creek. Tisdale Road is not located within the 100-year flood zone. See Figure 3-6 for flood risk areas within the project vicinity.

# 3.2.2.5 Coastal Zone Management

The CZMA encourages states, in cooperation with federal and local agencies, to develop land and water use programs in coastal zones. NSF Dahlgren is not within the statutory definition of Virginia's coastal zone; however, Section 307 of the CZMA applies if a proposed federal project affects land uses, water uses, or other coastal resources of a state's coastal zone. Federal consistency with the enforceable policies of a state's federally approved Coastal Zone Management Program is demonstrated by means of a Federal Consistency Determination that is submitted to the state agency responsible for review and comments. Applying for and complying with state permits when required by federal law also achieves consistency.

King George County is within Virginia's designated coastal zone. Virginia DEQ is the lead agency for coastal management and is responsible for enforcing the Commonwealth's federally approved Coastal Zone Management Program describing current coastal legislation and enforceable policies. The Virginia Coastal Zone Management Program has nine enforceable policies: fisheries management, subaqueous lands management, wetlands management, dune management, non-point source pollution control, point source pollution control, shoreline sanitation, air pollution control, and coastal lands management (which are land area designations defined in Virginia's Chesapeake Bay Preservation Act).

#### 3.2.3 Environmental Consequences

In this EA, the analysis of water resources looks at the potential impacts on groundwater, surface water, wetlands (jurisdictional and non-jurisdictional), floodplains, and the coastal zone. Groundwater analysis focuses on the potential for impacts on the quality, quantity, and accessibility of the water. The analysis of surface water quality considers the potential for impacts that may change the water quality, including both improving and degrading current water quality. The impact assessment of wetlands considers the potential for impacts that may change the local hydrology, soils, or vegetation that support a wetland. The analysis of floodplains considers if any new construction is proposed within a floodplain or may impede the functions of floodplains in conveying floodwaters. The analysis pertaining to the coastal zone considers the compatibility of the project with the enforceable policies of Virginia's approved Coastal Zone Management Program.

#### 3.2.3.1 No Action Alternative

Under the No Action Alternative, the Proposed Action would not occur, and there would be no change in baseline water resources. Therefore, no significant impacts on water resources would occur with implementation of the No Action Alternative.

# 3.2.3.2 Alternative 1: Existing Bridge Alignment (Preferred Alternative) Potential Impacts

The study area for the analysis of effects on water resources associated with Alternative 1 includes Gambo Creek and the wetlands in the vicinity of Alternative 1, with consideration for how changes during construction could affect other water resources on the installation and surrounding community. Alternative 1 would be built on the existing footprint of the Gambo Creek Bridge and roadway. Under Alternative 1, there would be an estimated net increase of 2,920 square feet of impervious surface. Since the proposed bridge would be constructed along the existing bridge alignment, proposed demolition and construction would occur over wetlands and Gambo Creek, and new construction would be accomplished by using the existing bridge deck as a platform, reducing impacts from construction vehicles. There would be no changes in operations associated with the new bridge.

There is a potential for minor effects on groundwater resources under Alternative 1. The study area includes IR Site 001, which is believed to have soil contamination from its historic use as a bombing range, as well as potential UXO. While no ground-disturbing activities would occur within IR Site 001, there is the potential that sediment contaminated with heavy metals could exist at the bridge site, which could be disturbed during bridge construction. As a precaution, soil and sediment samples would be taken prior to construction to determine if contaminants are present, and the Navy would remove and dispose of contaminated soil wastes appropriately. More information on IR Site 001 and soil contaminants is in Section 3.7. The Navy would use BMPs (e.g., good housekeeping measures for construction equipment containing petroleum, oil, and/or lubricants, and minimizing sediment transport) to prevent leeching of construction-related contaminants into

Water Resources Potential Impacts:

- No Action: No change in baseline conditions. No significant impacts.
- Alternative 1: Short-term, minor impacts on jurisdictional wetlands and water bodies from construction disturbance. Fill within the jurisdictional wetland to construct new abutments and bridge apron would be permitted and mitigated in accordance with Section 404 of the Clean Water Act. With mitigations and Section 404 permitting for impacts on jurisdictional wetlands, no significant impacts.
- Alternative 2: Similar to Alternative 1, but with increased impacts on jurisdictional wetlands due to the larger footprint. With mitigations and Section 404 permitting for impacts on jurisdictional wetlands, no significant impacts.
- Alternative 3: Similar to Alternative 1, but with increased impacts on jurisdictional wetlands due to the larger footprint. With mitigations and Section 404 permitting for impacts on jurisdictional wetlands, no significant impacts.

groundwater resources. Implementation of Alternative 1 would not increase the demand for pumped groundwater on NSF Dahlgren.

Alternative 1 would result in short-term, minor, adverse impacts on surface water resources from construction activities. Implementation of Alternative 1 would temporarily increase sedimentation and turbidity of Gambo Creek and the downstream Potomac River during bridge demolition, roadway construction, and cofferdam installation. Construction would directly affect Gambo Creek as construction occurs and indirectly affect downstream water bodies (i.e., the Potomac River). The Virginia NPDES stormwater program for an individual construction or demolition permit (like Alternative 1) requires the preparation of a Notice of Intent and implementation of a stormwater pollution prevention

plan (SWPPP) during construction. Impacts on surface water would be minimized through BMPs outlined in the SWPPP to protect against soil erosion and sedimentation into receiving water bodies at or near the Alternative 1 site. Impacts on surface water quality could occur due to the proximity to IR Site 001, as previously described; sediments would be monitored by the Navy and, if contamination is present, the Navy would use BMPs to minimize impacts on surface water quality. The Navy would comply with all applicable Virginia Erosion and Sediment Control Laws and Regulations and Virginia Stormwater Management Laws and Regulations, which are also discussed in the DEQ Office of Stormwater Management's review of this project in the Federal Consistency Determination (see Appendix B).

The use of cofferdams during bridge construction would alter the flow of Gambo Creek during construction. Cofferdams would be used as necessary for the installation of new bridge piers but would not completely block flow during construction activities. Cofferdams and construction equipment within Gambo Creek would likely loosen and introduce sandy sediments into the creek, increasing turbidity and reducing water quality. Although increases in turbidity may occur, impacts would be localized and temporary, lasting only as long as equipment and materials are used within the creek bed. After construction activity is complete, sedimentation and turbidity levels would return to preconstruction levels.

Under Alternative 1, there would be short-term wetland disturbance of up to 63,860 square feet during construction activities. Construction disturbance would be primarily short term and minor. Bridge designs have not been finalized, but any direct, long-term impacts (i.e., discharge of fill material) within the jurisdictional wetland would be permitted and mitigated in accordance with Section 404 of the Clean Water Act, to reduce impacts to less than significant. As shown in Figure 3-6, wetlands are present on both sides of Gambo Creek. The bridge would be constructed to span over the wetland areas, and shortterm impacts on wetlands would be anticipated from cutting existing pilings, inserting new pilings to support the new bridge, and installing cofferdams within Gambo Creek adjacent to the wetlands. Placement of pilings for bridges is not considered a discharge of fill material under Section 404 of the Clean Water Act. Bridge construction and demolition would occur concurrently, so that the existing bridge deck can be used as a platform for construction contractors to demolish the decking, decking beams, and bridge columns down to the wetland surface. The new bridge would have seven new supports, and the current 26 bridge supports would be removed. The use of the existing roadway temporarily to demolish the foundations and to drive new piles would minimize the disturbance area. A small excavator would be used to remove rubble via a timber pathway, but otherwise there would be minimal requirements for off-road construction vehicles.

Construction vehicles would cross the wetlands in order to add and cut pilings, and to set up and remove cofferdams. Construction BMPs would be implemented to reduce temporary impacts on the wetlands from construction vehicles. Indirect impacts on wetlands located within and adjacent to the Alternative 1 site could occur from construction activity, including an inflow of surface water and sediments, and changes in local drainage patterns from an increase in impervious surface. However, indirect impacts would be implementing erosion- and sediment-control BMPs.

The implementation of Alternative 1 would unavoidably result in the discharge of fill within jurisdictional, tidal wetlands in order to construct new abutments and aprons for the proposed bridge. Permitting for work within jurisdictional wetlands would be done in accordance with Section 404 of the Clean Water Act, and the Navy would mitigate impacts on jurisdictional wetlands. Section 404 of the Clean Water Act regulates the discharge of dredged or fill material into waters of the United States. Design plans have not yet been finalized, but the Navy and permitting agencies (including USACE, VMRC,

Virginia DEQ, and the King George Wetlands Board) have determined that a Joint Permit Application would be required for anticipated impacts on the wetlands for the bridge construction. The Joint Permit would fall under USACE Nationwide Permit 14 for Linear Transportation Projects. This Nationwide Permit sets forth permitting conditions, under which compensatory mitigation for impacts are prescribed at a minimum of 1:1 for all wetland losses exceeding one-tenth acre. The wetland delineation of the project site was reviewed and approved by USACE under a Preliminary Jurisdictional Determination (see Appendix B). Once bridge designs are finalized, the Navy will obtain all required permits pursuant to Section 404 of the Clean Water Act and implement all necessary mitigations.

The Navy would also coordinate with USCG to receive authorization for bridge construction under Section 9 of the Rivers and Harbors Act.

The bridge construction under Alternative 1 would be within the 100-year floodplain associated with Gambo Creek (Figure 3-6). Construction-related activities within the floodplain are unavoidable. Short-term, minor impacts on floodplains from construction activities adjacent to and within the creek would be expected. EO 11988 directs agencies to avoid impacts on floodplains or, if impacts cannot be avoided, to develop measures to minimize impacts and restore and preserve the floodplain, as appropriate. After construction is completed, equipment would be removed, and the disturbed areas restored to preconstruction conditions. In order to construct the new bridge, which would be wider than the existing bridge, soil would need to be removed and replaced to achieve the compaction and stabilization needed for the new bridge approaches and abutments. The current alignment of Tisdale Road and anticipated height of the proposed replacement bridge are outside the 100-year floodplain. The Navy would attempt to minimize long-term impacts on the existing floodplain by restoring and preserving the existing floodplain to the extent practicable to reduce flood risk. Impacts on the floodplains would be minor under Alternative 1.

The project site is within Virginia's coastal zone. In accordance with CZMA Section 307, the Navy submitted a Federal Consistency Determination to the Virginia DEQ. The nine enforceable policies of Virginia Coastal Zone Management Program pertain to fisheries management, state-owned subaqueous lands management, wetlands management, dune management, non-point source pollution control, point source pollution control, shoreline sanitation, air pollution control, and coastal lands management. Alternative 1 would not affect state-owned subaqueous lands, dunes, new point sources of pollution, or septic tanks along shorelines. Sediment and stormwater management practices would minimize the potential for non-point source pollution to affect off-installation coastal lands during construction and operations. Sources of air pollution would not be expected to result in violations of NAAQS, as discussed in Section 3.1. Fisheries and wetlands would be affected by Alternative 1; however, BMPs and minimization measures would be applied, and the Navy would adhere to relevant regulations and permits. Gambo Creek is considered a Chesapeake Bay Preservation Area (i.e., Resource Protection Area). The Navy coordinated with the Virginia DEQ pursuant to the CZMA. The Proposed Action was found to be consistent to the maximum extent practicable with the enforceable policies of the Virginia Coastal Zone Management Program, provided that the Navy obtains and complies with all applicable permits, approvals, and regulatory requirements (see letter dated March 23, 2020, Appendix B).

Implementation of Alternative 1 would not result in significant impacts on water resources.

#### 3.2.3.3 Alternative 2: Southern Bridge Alignment Potential Impacts

The study area for the analysis of effects on water resources associated with Alternative 2 is the same as for Alternative 1—the lower portion of Gambo Creek and the wetlands in the vicinity of Alternative 2, with consideration for how changes during construction could affect other water resources on the installation and surrounding community. Alternative 2 would be built south of the existing bridge footprint, resulting in the loss of tree cover of approximately 10,790 square feet and a net increase of impervious surface of 30,040 square feet. Since the proposed bridge would be constructed south of the existing bridge alignment, the total area of the proposed demolition and construction would occur over wetlands and Gambo Creek. There would be no changes in operations associated with the new bridge.

Land disturbance associated with Alternative 2 would exceed one acre, requiring a Virginia NPDES permit for stormwater on construction sites. As a component of the permit, the construction contractor would develop a SWPPP to address stormwater during construction. The SWPPP must address erosionand sediment-control (satisfied by a Virginia DEQ-approved erosion- and sediment-control plan and consistent with Virginia laws and regulations). The permit requires the use of BMPs to protect against soil erosion and sedimentation into receiving water bodies. The permit also requires the contractor to regularly inspect stormwater discharges from construction to ensure that BMPs are controlling the discharge of pollutants to the maximum extent practicable and are meeting water quality standards. In addition, the SWPPP requires the contractor to manage other wastes on site, such as construction materials, garbage, and debris, and to have controls to minimize the exposure of these materials to stormwater to minimize the discharge of pollutants to state waters. The Virginia DEQ-approved erosionand sediment-control plan would show the existing topography of the site, indicate how the topography would be altered, identify site-specific measures to be used to control erosion and minimize or eliminate sedimentation into surface water bodies, and describe how these site-specific measures would be implemented and maintained during construction. Use of erosion- and sediment-control practices during the construction phase would minimize adverse impacts on surface water bodies.

Impacts on water resources under Alternative 2 would be similar to those described for Alternative 1, but some impacts would be greater due to the new bridge footprint and greater alterations to the roadway approach under Alternative 2.

Alternative 2 would have the potential for minor impacts on groundwater resources due to proximity to IR Site 001, similar to what is described under Alternative 1.

Alternative 2 would have short-term, minor, adverse impacts on surface water resources from construction activities, similar to what is described under Alternative 1. Potential impacts on the water quality of Gambo Creek and the Potomac River would occur during roadway construction, cofferdam installation, and bridge and utility demolition, all of which would cause ground disturbance, leading to increased sedimentation and turbidity in surface waters. The roadwork under Alternative 2 would be greater than Alternative 1, so the potential for erosion and sedimentation would be increased under this alternative as compared with Alternative 1, causing greater potential impacts on water quality. As with Alternative 1, these impacts would be minimized through BMPs to protect against soil erosion and sedimentation into receiving water bodies. Impacts on surface water quality could occur due to the proximity to IR Site 001, as previously described; sediments would be monitored by the Navy and, if contamination is present, the Navy would use BMPs to minimize impacts on surface water quality.

As described under Alternative 1, the use of cofferdams during bridge construction would alter but would not completely block the flow of Gambo Creek during construction. Impacts from the cofferdams on surface waters would be localized and temporary.

Impacts on jurisdictional wetlands under Alternative 2 would be similar to what is expected under Alternative 1, but to a greater extent. The Alternative 2 construction and demolition footprint would be larger than under Alternative 1. There would be short-term disturbance of up to 75,520 square feet of jurisdictional wetlands during construction activities. Short-term, minor construction disturbance within the jurisdictional wetlands would occur from cutting existing pilings, inserting new pilings to support the new bridge, and installing cofferdams adjacent to the wetlands. Construction vehicles would cross the wetlands in order to add and cut pilings, and to set up and remove the cofferdams, but the use of BMPs would minimize construction impacts.

The new bridge would unavoidably result in fill material in jurisdictional, tidal wetlands associated with Gambo Creek. Design plans have not yet been finalized, but the Navy and permitting agencies have determined that a Joint Permit Application under Nationwide Permit 14 for Linear Transportation Projects for the bridge construction would be required. Compensatory mitigation for impacts are prescribed at a minimum of 1:1 for all wetland losses exceeding one-tenth acre. The wetland delineation of the project site was reviewed and approved by USACE under a Preliminary Jurisdictional Determination (see Appendix B). Once bridge designs are finalized, the Navy will obtain all required permits pursuant to Section 404 of the Clean Water Act and implement all necessary mitigations.

Bridge construction would also require a permit under Section 9 of the Rivers and Harbors Act, which is issued by USCG.

Impacts on the floodplain under Alternative 2 would be similar to what are described under Alternative 1. Alternative 2 would have a net increase of impervious surface over Alternative 1, but impacts on the floodplain would remain minor under Alternative 2.

Alternative 2 is within Virginia's coastal zone, and within a Chesapeake Bay Preservation Area (i.e., a Resource Protection Area). Impacts on the coastal zone would be the same as described under Alternative 1. Virginia DEQ found the Proposed Action to be consistent to the maximum extent practicable with the enforceable policies of the Virginia Coastal Zone Management Program, provided that the Navy obtains and complies with all applicable permits, approvals, and regulatory requirements (see letter dated March 23, 2020, Appendix B).

Implementation of Alternative 2 would not result in significant impacts on water resources.

#### 3.2.3.4 Alternative 3: Parallel Bridge Alignment Potential Impacts

The study area for the analysis of effects on water resources associated with Alternative 3 is the same as for Alternative 1—the lower portion of Gambo Creek and the wetlands in the vicinity of Alternative 3, with consideration for how changes during construction could affect other water resources on the installation and surrounding community. Under Alternative 3, there would be a loss of tree cover of approximately 8,290 square feet and a net increase of impervious surface of an estimated 22,210 square feet. Since the proposed bridge would be constructed adjacent to the existing bridge alignment, proposed construction would occur over wetlands and Gambo Creek.

Land disturbance associated with Alternative 3 would exceed one acre, requiring a General Permit for Stormwater on Construction Sites, a SWPPP, and an erosion- and sediment-control plan and consistent with Virginia laws and regulations. The requirements of these permits and plans are previously described, under Alternative 1 and Alternative 2.

Alternative 3 would have the potential for minor impacts on groundwater resources due to proximity to IR Site 001, similar to what is described under Alternative 1 and Alternative 2.

Alternative 3 would have short-term, minor, adverse impacts on surface water resources from construction activities, similar to what is described under Alternative 1. Potential impacts on the water quality of Gambo Creek and the Potomac River would occur during roadway construction and cofferdam installation, which would all cause ground disturbance, leading to increased sedimentation and turbidity in surface waters. The roadwork under Alternative 3 would be greater than Alternative 1 and similar to Alternative 2. As with Alternative 1, these impacts would be minimized through BMPs to protect against soil erosion and sedimentation into receiving water bodies. Impacts on surface water quality could occur due to the proximity to IR Site 001, as previously described; sediments would be monitored by the Navy and, if contamination is present, the Navy would use BMPs to minimize impacts on surface water quality.

As described under Alternative 1, the use of cofferdams during bridge construction would alter the flow of Gambo Creek but would not completely block the flow of the creek during construction. Impacts from the cofferdams on surface waters would be localized and temporary.

Impacts on wetlands under Alternative 3 would be similar to what is expected under Alternative 1, but to a greater extent. The Alternative 3 construction footprint would be larger than under Alternative 1 and Alternative 2. There would be disturbance within an estimated 70,190 square feet during construction activities. Construction disturbance would be primarily short term and minor. Construction disturbance within the jurisdictional wetlands would occur from inserting new pilings to support the new bridge and installing cofferdams adjacent to the wetlands. Construction vehicles would cross the wetlands in order to add pilings, and to set up and remove the cofferdams. As with Alternative 1, these impacts would be minimized through BMPs to protect the wetlands.

The new bridge would unavoidably result in fill material in jurisdictional, tidal wetlands associated with Gambo Creek. Design plans have not yet been finalized, but the Navy and permitting agencies have determined that a Joint Permit Application under Nationwide Permit 14 for Linear Transportation Projects for the bridge construction would be required. Compensatory mitigation for impacts are prescribed at a minimum of 1:1 for all wetland losses exceeding one-tenth acre. The wetland delineation of the project site was reviewed and approved by USACE under a Preliminary Jurisdictional Determination (see Appendix B). Once bridge designs are finalized, the Navy will obtain all required permits pursuant to Section 404 of the Clean Water Act and implement all necessary mitigations.

Bridge construction would also require a permit under Section 9 of the Rivers and Harbors Act, which is issued by USCG.

Impacts on the floodplain under Alternative 3 would be the similar to what are described under Alternative 1. Alternative 3 would have a net increase of impervious surface over Alternative 1, but impacts on the floodplain would remain minor under Alternative 3.

Alternative 3 is within Virginia's coastal zone, and within a Chesapeake Bay Preservation Area (i.e., a Resource Protection Area). Impacts on the coastal zone would be the same as described under Alternative 1. Virginia DEQ found the Proposed Action to be consistent to the maximum extent practicable with the enforceable policies of the Virginia Coastal Zone Management Program, provided that the Navy obtains and complies with all applicable permits, approvals, and regulatory requirements (see letter dated March 23, 2020, Appendix B).

Implementation of Alternative 3 would not result in significant impacts on water resources.

# 3.3 Geological Resources

This discussion of geological resources includes topography, geology, and soils of a given area. Topography is typically described with respect to the elevation, slope, and surface features found within a given area. The geology of an area may include bedrock materials, mineral deposits, and fossil remains. The principal geological factors influencing the stability of structures are soil stability and seismic properties. Soil refers to unconsolidated earthen materials overlying bedrock or other parent material. Soil structure, elasticity, strength, shrink-swell potential, and erodibility determine the ability for the ground to support structures and facilities. Soils are typically described in terms of their type, slope, physical characteristics, and relative compatibility or limitations regarding particular construction activities and types of land use.

#### 3.3.1 Regulatory Setting

Consideration of geologic resources extends to prime or unique farmlands. The Farmland Protection Policy Act was enacted in 1981 in order to minimize the loss of prime farmland and unique farmlands as a result of federal actions. The implementing procedures of the Farmland Protection Policy Act require federal agencies to evaluate the adverse effects of their activities on farmland, which includes prime and unique farmland and farmland of statewide and local importance, and to consider alternative actions that could avoid adverse effects. The project areas considered in this EA are primarily aquatic and would not be considered available for use as farmland. Therefore, prime farmland is not considered further in this EA.

#### 3.3.2 Affected Environment

The following discussions provide a description of the existing conditions for each of the categories under geological resources at NSF Dahlgren.

#### 3.3.2.1 Topography

NSF Dahlgren's topography is generally low and flat with elevations ranging from mean sea level near the Potomac River and its tributaries to 28 feet above mean sea level. Most slopes are gradual; however, steep slopes are found along sections of streams within the installation and along the Potomac River shoreline (Navy, 2013). The topography at the alternative sites is primarily flat. Most of the area has slopes of one degree or less with a few areas having slopes of less than five degrees, which was calculated using a standard digital elevation model developed for the U.S. Geological Survey.

#### 3.3.2.2 Geology

NSF Dahlgren is located within the Coastal Plain physiographic province. The Coastal Plain province consists of an eastward-thickening sedimentary wedge of unconsolidated sediments, including silt, clay, and sand, with some gravel and lignite. The sediments range in geologic age from the Cretaceous to the

Quaternary Periods. There are approximately 1,500 feet of Coastal Plain unconsolidated sediment beneath NSF Dahlgren. The unconsolidated sediments are underlain by crystalline basement rock (Navy, 2013).

Surficial sediments at NSF Dahlgren are Quaternary-age deposits derived from Holocene deposits and the Tabb Formation, and Tertiary-age deposits derived from Calvert Formation, Chickahominy Formation, and Piney Point Formation sediments. The surficial deposits vary in thickness due to erosion and deposition over time. The Calvert, Chickahominy, and Piney Point Formations may be absent in portions of the installation. The Nanjemoy Formation underlies the surficial sediments. This formation, which is approximately 148 feet thick, is composed of alternating quartz and glauconite sands, clays, and calcitic units of shell and cavernous shell limestone of the Tertiary Period. The Marlboro Clay in turn underlies the Nanjemoy Formation. The Marlboro Clay is a 20- to 30-foot-thick clay, alternating pinkishorange and dark gray in color. The Aquia Formation underlies the Marlboro Clay and consists of distinctive dark green to gray-green, argillaceous, glauconitic, well-sorted sand with indurated shell beds. The thickness of the Aquia Formation ranges up to 100 feet. Finally, the Cretaceous Period Potomac Group underlies the Aquia Formation; it is approximately 1,000 feet thick and is the oldest and deepest formation, resting on the crystalline basement rock (Navy, 2013).

#### 3.3.2.3 Soils

Twenty named soil types are within the installation. The primary soil type found across NSF Dahlgren consists of the Tetotum-Bladen-Bertie soil association. This soil association is characterized by deep, moderately well-drained to poorly drained soils with clay loam, sandy clay loam, or clay subsoil in broad, low-lying areas. The Natural Resources Conservation Service (NRCS) National Hydric Soil List identifies three hydric soil types that occur at NSF Dahlgren: Bladen loam, Fallingston very fine sandy loam, and Pooler loam. Hydric soils typically support hydrophytic vegetation and occur in wetland areas (Navy, 2013).

Bladen loam is located throughout large areas of Mainside and comprises the sites analyzed in this EA (Wray, 2013). This soil is described as a deep, poorly drained, nearly level (0 to 2 percent slopes) soil. Textures range from loam-clay to clay, and permeability is slow. It is very strongly acidic and low in natural fertility and organic matter content. A seasonal high-water table remains near the surface for long periods (Navy, 2013).

#### 3.3.2.4 Geologic Hazards

Historically, earthquakes have occurred infrequently in Virginia. The most recent earthquakes in the state occurred in Central Virginia and have generally been at a magnitude of 3.0 or less with few that reach a magnitude of 4.0 or higher. The last large earthquake to affect the state occurred in 2011 in Mineral, Virginia, with a magnitude of 5.8 (VTSO, n.d.).

#### 3.3.3 Environmental Consequences

Geological resources are analyzed in terms of drainage, erosion, land subsidence, and seismic activity. The analysis of topography and soils focuses on the area of soils that would be disturbed, the potential for erosion of soils from construction areas, and the potential for eroded soils to become pollutants in downstream surface water during storm events. The analysis also examines potential impacts related to seismic events. BMPs are identified to minimize soil impacts and prevent or control pollutant releases into stormwater. The potentially affected environment for geological resources is limited to lands that would be disturbed by any proposed facility development or demolition.

#### 3.3.3.1 No Action Alternative

Under the No Action Alternative, the Proposed Action would not occur, and there would be no change in baseline geologic resources. Therefore, no significant impacts on geologic resources would occur with implementation of the No Action Alternative.

# **3.3.3.2** Alternative 1: Existing Bridge Alignment (Preferred Alternative) Potential Impacts

The study area for the analysis of effects on geological resources associated with Alternative 1 includes the Gambo Creek shorelines, and soils and sediments in the waterway in and surrounding the project site. Alternative 1 would have short- and long-term, minor impacts on geological resources.

Geological Resources Potential Impacts:

- No Action: No change in baseline condition. No significant impacts.
- Alternative 1: Short- and longterm, minor impacts. No significant impacts.
- Alternative 2: Short- and longterm, minor impacts. No significant impacts.
- Alternative 3: Short- and longterm, minor impacts. No significant impacts.

Demolition and construction activities would be expected to directly affect the soils as a result of excavation and fill to prepare the site for development. Under Alternative 1, the proposed bridge would be wider than the existing bridge; therefore, new abutments would be installed with concrete apron approaches leading to the abutments. The soil on the banks of Gambo Creek consists of either alluvial deposits of sediments or reclaimed swampland with a high clay and moisture content. As a result, during construction of the new abutments and apron, the existing soil would need to be removed and replaced with soils that can be compacted and stabilized. This would include approximately 10,600 cubic feet of soil excavation and 141,300 cubic feet of fill. Minor increases in impervious surfaces associated with the new abutments and approaches would also occur.

Sediments contaminated with heavy metals by munitions could potentially be disturbed during bridge construction. As a precaution, soil and sediment samples would be taken prior to construction to determine if contaminants are present, and the Navy would remove and dispose of contaminated soil wastes appropriately. More information on IR Site 001 and soil contaminants in the area can be found in Section 3.7.

During construction, cofferdams would be used when working below the waterline. This process involves driving steel beams into the mud. As discussed in Section 3.2.3.2, cofferdams and construction equipment within Gambo Creek would likely loosen soils in the creek, resulting in increases in turbidity and reducing water quality. However, these impacts would be localized and temporary, lasting only as long as equipment and materials are used within the creek bed. After construction activity is complete, sedimentation and turbidity levels would return to preconstruction levels. An erosion- and sediment-control plan would be developed with BMPs to minimize impacts as a result of demolition and construction.

During construction, a laydown area would be used on the western side of the existing bridge to house equipment. This area consists mostly of gravel (see Figure 2-1), and the soils are already compacted. There may be some minor disturbances from the equipment accessing the site; however, these effects would be short term and negligible.

The total area of disturbance under Alternative 1 would be approximately 80,080 square feet, which is larger than one acre and would, therefore, require a Virginia NPDES permit for discharges of stormwater from construction activities (Virginia DEQ, 2019). As required by the Virginia DEQ and discussed in Section 3.2.3.2, a SWPPP to address stormwater during construction, an erosion- and sediment-control plan, and BMPs to protect against soil erosion and sedimentation in receiving water bodies would be required. The erosion- and sediment-control plan would show the existing topography of the site, indicate how the topography would be altered, and identify measures to be used to minimize impacts. The Navy would comply with all applicable Virginia Erosion and Sediment Control Laws and Regulations and Virginia Stormwater Management Laws and Regulations, which are also discussed in the DEQ Office of Stormwater Management's review of this project in the Federal Consistency Determination (see Appendix B).

Long-term, minor impacts would occur once the bridge is constructed. There would be an increase in impervious surface of approximately 2,920 square feet and approximately 3,340 square feet of tree loss. The new soils at the abutment would compact and stabilize, and revegetation would occur to prevent future erosion; therefore, soils are not expected to erode in the surface water. Any changes in topography would be minor and similar to the existing topography at the shoreline.

Implementation of Alternative 1 would not result in significant impact on geological resources.

#### 3.3.3.3 Alternative 2: Southern Bridge Alignment Potential Impacts

The study area for the analysis of effects on geological resources associated with Alternative 2 includes the Gambo Creek shorelines, and soils and sediments in the waterway in and surrounding the project site. Alternative 2 would result in short- and long-term, minor impacts on geological resources.

Demolition and construction activities would be expected to directly affect the soils as a result of excavation and fill to prepare the site for development. Under Alternative 2, the proposed bridge would be constructed in a different area than the existing bridge; therefore, new abutments would need to be installed with concrete apron approaches leading to the abutments. The soil on the banks of Gambo Creek consists of either alluvial deposits of sediments or reclaimed swampland with a high clay and moisture content. As a result, during construction of the new abutments and apron, the existing soil would need to be removed and replaced with soils that can be compacted and stabilized. At this time, the amount of soil excavation and fill are unknown; however, the amounts would be greater than discussed under Alternative 1 since the site is undeveloped and all the abutments would be new. This alternative may also have an increased potential to encounter contaminated sediments due to the larger area that is undeveloped. As discussed in Section 3.3.3.2, the Navy would take samples prior to construction and remove and dispose of contaminated wastes appropriately.

Under Alternative 2, there would be increase in impervious surface of approximately 30,040 square feet. In addition, there would be a loss of tree cover from the construction of the new bridge south of approximately 10,790 square feet. The increase in impervious surface and the loss of the tree cover could lead to erosion and sediment runoff into Gambo Creek and the potential for a change in drainage patterns; however, BMPs would be implemented to minimize impacts. After the existing bridge is demolished and removed, the area would likely be replanted to compensate for loss the tree cover. The changes in the topography and slope at the site of the new bridge would be similar to slopes currently at the existing bridge location. The total area of disturbance under Alternative 2 would be approximately 131,340 square feet, which is larger than an acre and would require a Virginia NPDES permit for discharges of stormwater from construction activities (Virginia DEQ, 2019). As required by the Virginia DEQ and discussed in Section 3.2.3.3, a SWPPP to address stormwater during construction, an erosion- and sediment-control plan, and BMPs to protect against soil erosion and sedimentation in receiving water bodies would be required. The erosion- and sediment-control plan would show the existing topography of the site, indicate how the topography would be altered, and identify measures to be used to minimize impacts.

Impacts from demolition, the laydown area, and cofferdams used during construction would be the same as discussed under Alternative 1.

Long-term, minor impacts would occur once the bridge is constructed from the increase in impervious surface and tree loss. The new soils at the abutment would compact and stabilize, and revegetation would occur to prevent future erosion; therefore, soils are not expected to erode in the surface water. Changes in topography would be minor and similar to the existing topography at the shoreline.

Implementation of Alternative 2 would not result in significant impacts on geological resources.

#### 3.3.3.4 Alternative 3: Parallel Bridge Alignment Potential Impacts

The study area for the analysis of effects on geological resources associated with Alternative 3 includes the Gambo Creek shorelines, and soils and sediments in the waterway in and surrounding the project site. Alternative 3 would result in short- and long-term impacts on geological resources.

Construction activities would be expected to directly affect the soils as a result of excavation and fill to prepare the site for development. Under Alternative 3, a new one-way bridge would be constructed south of the existing bridge; therefore, new abutments would need to be installed with concrete apron approaches leading to the abutments. The soil on the banks of Gambo Creek consists of either alluvial deposits of sediments or reclaimed swampland with a high clay and moisture content. As a result, during construction of the new abutments and apron, the existing soil would need to be removed and replaced with soils that can be compacted and stabilized. At this time, the amount of soil excavation and fill are unknown. However, since the location of the new bridge is undeveloped and all the abutments would be new, it is assumed that the amounts would be greater than discussed under Alternative 1. This alternative may also have an increased potential to encounter contaminated sediments due to the larger area that is undeveloped. As discussed in Section 3.3.3.2, the Navy would take samples prior to construction and remove and dispose of contaminated wastes appropriately.

Under Alternative 3, there would be an increase in impervious surface of approximately 22,210 square feet. In addition, there would be a loss of tree cover of approximately 8,290 square feet. Similar to Alternatives 1 and 2, the increase in impervious surface and the loss of the tree cover could lead to erosion and sediment runoff into Gambo Creek and the potential for a change in drainage patterns; however, BMPs would be implemented to minimize impacts.

The area of disturbance under Alternative 3 would be approximately 117,520 square feet, which is larger than an acre and would, therefore, require a Virginia NPDES permit. The Virginia NPDES permit requires a SWPPP, an erosion- and sediment-control plan, and BMPs to protect against soil erosion and sedimentation. The erosion- and sediment-control plan would show the existing topography of the site, indicate how the topography would be altered, and identify measures to be used to minimize impacts.

Long-term, minor impacts would occur once the bridge is constructed from the increase in impervious surface and tree loss. The new soils at the abutment would compact and stabilize, and revegetation would occur to prevent future erosion; therefore, soils are not expected to erode in the surface water. Changes in topography would be minor and similar to the existing topography at the shoreline.

Impacts from demolition, the laydown area, and cofferdams used during construction would be the same as discussed under Alternative 1.

Implementation of Alternative 3 would not result in significant impacts on geological resources.

# 3.4 Cultural Resources

This discussion of cultural resources includes prehistoric and historic archaeological sites; historic buildings, structures, and districts; and physical entities and human-made or natural features important to a culture, a subculture, or a community for traditional, religious, or other reasons. Cultural resources can be divided into three major categories:

- Archaeological resources (prehistoric and historic) are locations where human activity measurably altered the earth or left deposits of physical remains.
- Architectural resources include standing buildings, structures, landscapes, and other builtenvironment resources of historic or aesthetic significance.
- Traditional cultural properties may include archaeological resources, structures, neighborhoods, prominent topographic features, habitat, plants, animals, and minerals that Native Americans or other groups consider essential for the preservation of traditional culture.

#### 3.4.1 Regulatory Setting

Cultural resources are governed by other federal laws and regulations, including the National Historic Preservation Act (NHPA), Archeological and Historic Preservation Act (AHPA), American Indian Religious Freedom Act (AIRFA), Archaeological Resources Protection Act of 1979 (ARPA), and the Native American Graves Protection and Repatriation Act of 1990 (NAGPRA). Federal agencies' responsibility for protecting historic properties is defined primarily by Sections 106 and 110 of the NHPA. Section 106 requires federal agencies to consider the effects of their undertakings on historic properties. Section 110 of the NHPA requires federal agencies to establish—in conjunction with the Secretary of the Interior—historic preservation programs for the identification, evaluation, and protection of historic properties. Cultural resources also may be covered by state, local, and territorial laws.

#### 3.4.2 Affected Environment

Cultural resources listed in the National Register of Historic Places (NRHP) or eligible for listing in the NRHP are "historic properties" as defined by the NHPA. The list was established under the NHPA and is administered by the National Park Service on behalf of the Secretary of the Interior. The NRHP includes properties on public and private land. Properties can be determined eligible for listing in the NRHP by the Secretary of the Interior or by a federal agency official with concurrence from the applicable State Historic Preservation Office (SHPO). An NRHP-eligible property has the same protections as a property listed in the NRHP. The historic properties include archaeological and architectural resources. The Navy has conducted inventories of cultural resources at NSF Dahlgren to identify historic properties that are listed or potentially eligible for listing in the NRHP, as discussed further below (Navy, 2014).

The area of potential effect (APE) for cultural resources is the geographic area or areas within which an undertaking (project, activity, program, or practice) may cause changes in the character or use of any historic properties present. The APE is influenced by the scale and nature of the undertaking and may be different for various kinds of effects caused by the undertaking. For this Proposed Action, the Navy identified an APE to encompass archaeological and architectural components. The archaeological portion includes where ground disturbance would occur. The architectural portion considers the viewshed from any historic aboveground structures or historic districts. Both the archaeological APE and the aboveground APE are shown in Figure 3-7.



Figure 3-7 Areas of Potential Effect

# 3.4.2.1 Archaeological Resources

Forty archaeological sites have been identified at NSF Dahlgren and registered with VDHR. These sites include both prehistoric and historic archaeological resources that range in occupation from the early Middle Archaic subperiod through the earlytwentieth century (refer to Figure 3-8 for summary timeline of archaeological periods relevant to this area). Archaeological surveys have been conducted near the project site with 11 sites located within a mile to the north and northwest of Gambo Creek Bridge. Most of the nearby sites are within a wooded area adjacent to the Plate Battery Area immediately to the north.

One archaeological site (Site 44KG0157) is either within or immediately adjacent to the three alternatives on the eastern side of Gambo Creek, south of the bridge. [Note: archaeological site locations are considered sensitive and are not depicted on a map for reference.] This prehistoric site is NRHP-eligible and

Early Archaic	9500 BCE-7500 BCE			
Middle Archaic	7500 BCE-3000 BCE			
Late Archaic	3000 BCE-1000 BCE			
Early Woodland	600 BCE-1000 CE			
Late Woodland	1000–1607			
Present				

Figure 3-8 Summary Timeline of Archaeological Periods

dates from the Late Archaic to the Early Woodland Period and includes a shell midden associated with the Late Archaic occupation. This is one of two sites at NSF Dahlgren that is currently NRHP-eligible. Site 44KG0157 was first identified during a survey by American University in 1979 (Evans, 1979) and later reexamined by the Mary Washington College Center for Historic Preservation (Klein, 1998).

A second site, Site 44KG0169, is located just northwest of, but outside, the project area. This site is a multicomponent site, with remains of a Woodland Period camp and an eighteenth- to early-nineteenth-century component (Klein, 1998). Its NRHP status is unevaluated (Navy, 2014).

In November 2019, Marstel-Day, LLC conducted a Phase I archaeological survey on the southwestern side of Gambo Creek Bridge to identify any new sites. An area of shell concentration was identified, and historic period artifacts were recovered. The shell concentration is possibly a natural tidal deposit, based on the location, appearance, and surrounding landform. It was found in a depression at the lowest point of the landform. One artifact was recovered in the shell concentration: a non-diagnostic, prehistoric biface fragment. Apart from the one prehistoric artifact, finds were historic period glass, metal debris, brick, and one piece of mortar/concrete, dating approximately from the early- to mid-twentieth century. Marstel-Day recommended the new site 44KG0423 not eligible for the NRHP; VDHR concurred in a letter dated June 9, 2020 (see Appendix B).

# 3.4.2.2 Architectural Resources

Establishment of NSF Dahlgren in 1918 is recognized as a significant event in our nation's history. As a result of historic architectural surveys conducted at NSF Dahlgren, the Dahlgren Mainside Historic District period of significance is 1918 to 1989 (the end of the Cold War). The Dahlgren Mainside Historic District period of areas: the Main Battery Area, the Wharf Area, the Ammunition Handling Area, and the Airfield Area. The district was determined significant for its contributions to weapons testing and weapons research and development from 1918 to 1945 under Criteria A and C. The district was eligible because it contained "a cohesive, intact group of historic resources that retain the overall integrity of design, materials, location, setting, workmanship, and association to convey their [period of] significance" (Best and Hirrel, 1994).



Figure 3-9 Mainside Historic District on Naval Support Facility Dahlgren

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Later research expanded the period of significance to 1989, to include work conducted during the Cold War (Navy, 2014). During the Cold War, work at Dahlgren was crucial to the development of weapons systems and warfare systems such as Polaris and Aegis Combat System. The U.S. Naval Space Surveillance Facility was housed at Dahlgren from 1960 to the end of the Cold War (Navy, 2014).

As part of the requirements per Section 106 of the NHPA for this undertaking, the Gambo Creek Bridge (VDHR ID No. 048-5192) was evaluated for the NRHP (see Figure 3-10 and Figure 3-11, showing views of Gambo Creek Bridge). It was determined that the bridge was not individually eligible for the NRHP; however, it was recommended as a contributing resource to the Dahlgren Mainside Historic District (VDHR ID No. 048-0104) as part of the Main Battery Area. It is a noncontiguous resource to the district as the Main Battery Area does not extend to Gambo Creek.

Building 469 (VDHR ID No. 048-5162) is the nearest aboveground resource to Gambo Creek Bridge located on the west end of the bridge on the north side of Tisdale Road. This building has been recommended NRHP-eligible as a contributing resource to the Dahlgren Mainside Historic District as part of the Plate and Main Battery Areas. Figure 3-7 shows the location of these resources within the project APE.

#### 3.4.2.3 Traditional Cultural Properties

There are no known traditional cultural properties within NSF Dahlgren.

# 3.4.2.4 Section 106 Consultation

In accordance with Section 106 of the NHPA, the Navy initiated consultation with VDHR as the Virginia SHPO to seek concurrence on the conclusions of this EA. VDHR recommended executing a PA for this undertaking to continue consultation as project development progresses. VDHR's letter dated June 9, 2020, is in Appendix B. The Programmatic Agreement is included as Appendix D.

The Navy consults with federally recognized Native American Tribes (or Native Hawaiian or Alaska Native Organizations) on actions with the potential to significantly affect protected tribal resources, tribal treaty rights, or Indian lands. As part of the consultation process, the Navy sent letters to nine federally recognized tribes who may have an interest in this location: the Pamunkey Indian Tribe, the Chickahominy Indians Eastern Division, the Upper Mattaponi Tribe, the Rappahannock Tribe, the Nansemond Indian Tribe, the Monacan Indian Nation, the Delaware Nation, and the Delaware Tribe. The Pamunkey Indian Tribe requested to be a consulting party but not sign any agreements between the Virginia SHPO and the Navy. No other tribes replied to the Navy's invitation to be included as consulting parties for this undertaking. Consultation letters and any responses received are in Appendix B.

# 3.4.3 Environmental Consequences

Analysis of potential impacts on cultural resources considers both direct and indirect impacts. Direct impacts may be the result of physically altering, damaging, or destroying all or part of a resource, altering characteristics of the surrounding environment that contribute to the importance of the resource, introducing visual, atmospheric, or audible elements that are out of character for the period the resource represents (thereby altering the setting), or neglecting the resource to the extent that it deteriorates or is destroyed.



Figure 3-10 View of Gambo Creek Bridge Looking East



Figure 3-11 View of Gambo Creek Bridge Looking West

#### 3.4.3.1 No Action Alternative

Under the No Action Alternative, the Proposed Action would not occur; however, there would be continued deterioration of the bridge. Insufficient maintenance could eventually cause bridge failure, which would be a long-term, minor, adverse effect on the Dahlgren Mainside Historic District due to neglect. As there would be no ground disturbance, there would be no change in belowground cultural resources. Therefore, no significant impacts on cultural resources would occur with implementation of the No Action Alternative.

# 3.4.3.2 Alternative 1: Existing Bridge Alignment (Preferred Alternative) Potential Impacts

The belowground APE includes the entire project site where potential ground disturbance would occur. The aboveground APE includes the project viewshed, which contains the nearby NRHP-eligible Building 469 as shown on Figure 3-7. Under Alternative 1, the current bridge would be demolished, which would have a direct adverse effect on the bridge because it is a contributing resource to the Dahlgren Mainside Historic District. Because the bridge is not individually eligible, but rather a contributing resource to the larger Mainside Historic District, the loss of this resource would not affect the significance or integrity of the historic district as a whole. The integrity of the entire Mainside Historic District would remain at a good-to-high level, and effects from the demolition of the existing Gambo Creek bridge would be considered a long-term adverse effect. In addition, the replacement bridge would not be NRHP-eligible to the Mainside Historic District as a contributing resource as its construction date is outside of the historic district's period of significance. There would be no direct or indirect effects on Building 469, an adjacent contributing resource. The replacement bridge would be of similar length and profile and would not adversely affect the viewsheds between the bridge, Building 469, and the surrounding landscape. Therefore, there would be no longterm, indirect adverse effects on the Mainside Historic District associated with the proposed demolition and construction of the bridge.

Cultural Resources Potential Impacts:

- No Action: Long-term, minor, adverse effect on the bridge due to deterioration. No significant impacts.
- Alternative 1: Long-term adverse effect on the bridge due to demolition. Possibility for unanticipated discovery; SOP 5 would be followed. Possible long-term, minor adverse effect on Site 44KG0157 due to bridge construction. With execution of the PA including Phase III recovery, no significant impacts.
- Alternative 2: Long-term adverse effect on the bridge due to demolition. Possibility for unanticipated discovery; SOP 5 would be followed. Long-term minor adverse effects on Site 44KG0157 due to bridge and road construction. With execution of the PA including Phase III recovery, no significant impacts.
- Alternative 3: Beneficial effects on the bridge due to planned repairs. Possibility for unanticipated discovery; SOP 5 would be followed. Long-term adverse effects on Site 44KG0157 due to bridge and road construction. With execution of the PA including Phase III recovery, no significant impacts.

There would be no adverse effects from the development of a temporary access road nor the laydown area on the western side of the existing bridge.

The proposed demolition and construction would cause minimal disturbance to the shoreline along Gambo Creek. The width of the new bridge would increase, resulting in possible impacts on Site 44KG0157, which is adjacent to Alternative 1 on the eastern side of Gambo Creek, south of the bridge. [Note: archaeological site locations are considered sensitive and are not depicted on a map for reference.] The Navy is consulting with the SHPO and interested tribes about adverse effects that would result from the bridge demolition and possible disturbance of adjacent archaeological sites. The Navy is also preparing a Phase III data recovery plan for Site 44KG0157 in case it is disturbed. Phase III data recovery would be a mitigation measure in a PA between the Navy and the SHPO, for which the Pamunkey Indian Tribe will be a consulting party. In addition, the PA would stipulate further design submissions of the proposed bridge to the SHPO with the intent of avoiding or minimizing impacts on Site 44KG0157. With the mitigation measures in the PA, implementation of Alternative 1 would not result in significant impacts on cultural resources.

In the event of an unanticipated discovery, including human remains or cultural properties, during the proposed demolition and construction, the Navy would follow specific procedures detailed in Standard Operating Procedure (SOP) 5, *Response to Unexpected Archaeological Discoveries*, in NSF Dahlgren's Integrated Cultural Resource Plan (ICRMP) and similarly outlined in the PA. This procedure requires that all operations immediately cease in the case of unexpected discoveries; the NAVFAC Washington Cultural Resources Program Manager, interested Native American tribes, and the SHPO would be contacted; and a qualified archaeologist would properly identify and appropriately treat discovered items in accordance with applicable state and federal law(s).

# 3.4.3.3 Alternative 2: Southern Bridge Alignment Potential Impacts

The APE for Alternative 2 is the same as Alternative 1, which includes the entire project site where potential ground disturbance would occur and the project viewshed, which contains the nearby NRHP-eligible Building 469. Alternative 2 would leave the current bridge in place during the construction of a new bridge immediately to the south. Following completion, the original bridge would be demolished. The demolition of Gambo Creek Bridge would have similar direct and indirect effects on aboveground resources as described under Alternative 1, which are long term and adverse. This demolition, however, would not change the eligibility status of the Mainside Historic District.

The new bridge would have a new alignment, and this would pass through the edge of the NRHP-eligible Site 44KG0157. There would be adverse effects on cultural resources with the new road and bridge alignment crossing through a portion of this site. The construction of the new bridge and associated roadway would destroy a portion of Site 44KG0157, which would be a direct adverse effect on cultural resources. The Navy is currently consulting with the SHPO on mitigation measures regarding adverse effects from the bridge demolition and disturbance of existing and potential sites. There would be no direct or indirect effects on Building 469, an adjacent contributing resource. The replacement bridge would be of similar length and profile. Although slightly further away, it would not adversely affect the viewsheds between the bridge, Building 469, and the surrounding landscape. Therefore, there would be no long-term, indirect adverse effects on the Dahlgren Mainside Historic District associated with the proposed demolition and construction of the bridge.

Similar to Alternative 1, there would be no adverse effects from the development of a temporary access road nor the laydown area on the western side of the existing bridge.

With the execution of mitigation measures between the Navy and the SHPO in a PA, including bridge design submissions and a Phase III data recovery, the implementation of Alternative 2 would not result in significant impacts on cultural resources.

In the event of an unanticipated discovery, including human remains or cultural properties, during the proposed demolition and construction, SOP 5 in NSF Dahlgren's ICRMP would be followed. This procedure requires all operations to immediately cease in the case of unexpected discoveries; the NAVFAC Washington Cultural Resources Program Manager, each interested Native American tribe, and the SHPO would be contacted; and a qualified archaeologist would properly identify and appropriately treat discovered items in accordance with applicable state and federal law(s).

# 3.4.3.4 Alternative 3: Parallel Bridge Alignment Potential Impacts

The APE for Alternative 3 is the same as Alternative 1, which includes the entire project site where potential ground disturbance would occur and extends to include the visual viewshed and the nearby NRHP-eligible Building 469. There would be no direct or indirect effects on Building 469, an adjacent contributing resource, as the bridge would remain in place. Alternative 3 would repair the current Gambo Creek Bridge, and a parallel bridge would be built south of the current structure. There would be beneficial effects on the NRHP-eligible Gambo Creek Bridge under Alternative 3. Repairs and maintenance would improve its condition and possibly slow deterioration, thereby resulting in beneficial effects. Adverse effects on belowground cultural resources would be similar as described in Alternative 2. Similar to Alternative 1, there would be no adverse effects on the development from a temporary access road nor the laydown area on the western side of the existing bridge.

With the execution of mitigation measures between the Navy and the SHPO in a PA regarding the adverse effects on belowground cultural resources, the implementation of Alternative 3 would not result in significant impacts on cultural resources.

In the event of an unanticipated discovery, including human remains or cultural properties, during the proposed demolition and construction, SOP 5 in NSF Dahlgren's ICRMP would be followed. This procedure requires all operations to immediately cease in the case of unexpected discoveries; the NAVFAC Washington Cultural Resources Program Manager, each interested Native American tribe, and the SHPO would be contacted; and a qualified archaeologist would properly identify and appropriately treat discovered items in accordance with applicable state and federal law(s).

# 3.5 Biological Resources

Biological resources include living, native, or naturalized plant and animal species and the habitats within which they occur. Plant associations are referred to generally as vegetation, and animal species are referred to generally as wildlife. Habitat can be defined as the resources and conditions present in an area that support a plant or animal. Within this EA, biological resources are divided into four major categories: vegetation, terrestrial wildlife, marine species, and threatened and endangered species.

#### 3.5.1 Regulatory Setting

Special-status species, for the purposes of this EA, are those species listed as threatened or endangered under the Endangered Species Act and species afforded federal protection under the Marine Mammal Protection Act or the Migratory Bird Treaty Act.

The purpose of the Endangered Species Act is to conserve the ecosystems upon which threatened and endangered species depend and to conserve and recover listed species. Section 7 of the Endangered Species Act requires action proponents to consult with USFWS or NOAA Fisheries to ensure that their actions are not likely to jeopardize the continued existence of federally listed threatened and endangered species, or result in the destruction or adverse modification of designated critical habitat. Critical habitat cannot be designated on any areas owned, controlled, or designated for use by the Department of Defense (DoD) where an Integrated Natural Resources Management Plan has been developed that, as determined by the Department of the Interior or Department of Commerce Secretaries, provides a benefit to the species subject to critical habitat designation.

All marine mammals are protected under the provisions of the Marine Mammal Protection Act. While marine mammals, namely the bottlenose dolphin (*Tursiops truncatus*), are occasionally sighted in the Potomac River as far north as Dahlgren, no marine mammals are found in Gambo Creek. Therefore, marine mammals are not discussed further in this EA.

Birds, both migratory and most native-resident bird species, are protected under the Migratory Bird Treaty Act, and their conservation by federal agencies is mandated by EO 13186, *Migratory Bird Conservation*. Under the Migratory Bird Treaty Act, it is unlawful by any means or in any manner, to pursue, hunt, take, capture, kill, attempt to take, capture, or kill, [or] possess migratory birds or their nests or eggs at any time, unless permitted by regulation. The 2003 National Defense Authorization Act gave the Secretary of the Interior authority to prescribe regulations to exempt the Armed Forces from the incidental taking of migratory birds during authorized military readiness activities. The final rule authorizing the DoD to take migratory birds in such cases includes a requirement that the Armed Forces must confer with the USFWS to develop and implement appropriate conservation measures to minimize or mitigate adverse effects of the proposed action if the action will have a significant negative effect on the sustainability of a population of a migratory bird species.

Bald and golden eagles are protected by the Bald and Golden Eagle Protection Act. This act prohibits anyone, without a permit issued by the Secretary of the Interior, from taking bald eagles, including their parts, nests, or eggs; "take" is defined as "pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb."

The Magnuson-Stevens Fishery Conservation and Management Act provides for the conservation and management of the fisheries. Under this act, EFH consists of the waters and substrate needed by fish to spawn, breed, feed, or grow to maturity. See Section 3.2.3 for the discussion regarding the CZMA.

# 3.5.2 Affected Environment

The following discussions provide a description of the existing conditions for each of the categories under biological resources at NSF Dahlgren. Federally listed threatened and endangered species are discussed in Section 3.5.2.4.

## 3.5.2.1 Vegetation

NSF Dahlgren contains a wide diversity of terrestrial habitats, as well as estuarine and palustrine wetland communities. A summary of terrestrial communities is included in Table 3-5. Floral surveys conducted in 1978 documented over 300 plant species representing 86 families. The complete list of floral species and vegetative communities present at NSF Dahlgren can be found in the Integrated Natural Resources Management Plan (Wray, 2013).

At the project site, the terrestrial vegetative communities consist of mixed pine-hardwood forest, manicured lawn, scrub-shrub habitat along the forest edge, and wetlands on either side of Gambo Creek. These communities include various pine and hardwood types such as loblolly pine (*Pinus taeda*), sweetgum (*Liquidambar styracifula*), red maple (*Acer rubrum*), and tulip poplar (*Lirodendron tulipfera*). Understories of these forest communities are varied and depend on site conditions (Wray, 2013). Gambo Creek consists of a brackish-intertidal emergent marsh community. These marshes are dominated by saltmarsh cordgrass (*Spartina alterniflora*), marsh elder (*Iva annua*), and pigweed (*Amaranthus cannabinus*) (Wray, 2013).

Based on a Virginia Natural Heritage database search, the following state- or federal-listed plant species may potentially be present in the Northern Neck region of Virginia but were not analyzed further in this EA due to a low likelihood of presence within the project site: small whorled pogonia (*Isotria medeoloides*), long beach seedbox (*Ludwigia brevipes*), and Virginia least trillium (*Trillium pusillum* var. *virginianum*) (VDCR, 2019; USFWS, 2019a; USFWS, 2011a; USFWS, 2019b). The VDCR Division of Natural Heritage found that there are no natural heritage resources (i.e., habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, or significant geologic formations) have not been documented within the project boundary including a 100-foot buffer (see correspondence in Appendix B).

Community	Percent of Installation	
Terrestrial communities	86	
Forest	52	
Mixed pine-hardwoods	31	
Hardwood forests	26	
Pine forests	6	
Open uplands	34	
Grasslands	6	
Developed/maintained area	28	
Wetlands	14	

## Table 3-5 Terrestrial Communities at Naval Support Facility Dahlgren

Source: Wray, 2013.

Note: Refer to Section 3.2, Water Resources, for full discussion of wetlands.

## 3.5.2.2 Terrestrial Wildlife

Wildlife includes all animal species (i.e., insects and other invertebrates, amphibians, reptiles, birds, and mammals), with a focus on the species and habitat features of greatest importance or interest. Fish species are discussed in Section 3.5.2.3. Faunal surveys conducted in 1978 documented 157 avian, 20 mammalian, 16 amphibian, and 16 reptilian species. The complete list of wildlife species present at NSF Dahlgren can be found in the Integrated Natural Resources Management Plan (Wray, 2013).

The installation's wetlands, ponds, and wooded areas provide habitat for a number of reptiles and amphibians that are common in the region. Common snakes include the northern water snake (*Nerodia s. sipedon*), black rat snake (*Elaphe obsoleta*), and northern black racer (*Coluber c. constrictor*). Common turtles include the common snapping turtle (*Chelydra serpentina*), red-bellied turtle (*Pseudemys rubriventris*), eastern mud turtle (*Kinosternon subrubrum*), and eastern box turtle (*Terrapene carolina*). Lizards found on the installation include ground skinks (*Scincella lateralis*) and five-lined skinks (*Eumeces fasciatus*). Of the amphibians that inhabit the area, frogs and toads comprise the largest group.

Common frogs and toads found on the installations include the American toad (*Bufo americanus*), green frog (*Rana clamitans*), southern leopard frog (*Rana sphenocephala*), spring peeper (*Pseudacris crucifer*), green tree frog (*Hyla cinerea*), and upland chorus frog (*Pseudacris triseriata*) (Wray, 2013).

Forest habitats at NSF Dahlgren generally support a variety of mammal species. Large mammal species observed on NSF Dahlgren include white-tail deer (*Odocoileus virginianus*), coyote (*Canis latrans*), grey fox (*Urocyon cinereoargenteus*), and red fox (*Vulpes vulpes*). Medium and small mammals include eastern cottontail (*Sylvilagus floridanus*), opossum (*Didelphis virginiana*), raccoon (*Procyon lotor*), striped skunk (*Mephitis mephitis*), grey squirrel (*Sciurus carolinensis*), white-footed mouse (*Peromyscus leucopus*), groundhog (*Marmota monax*), beaver (*Castor canadensis*), river otter (*Lontra canadensis*), muskrat (*Ondatra zibethicus*), mink (*Mustela vison*), long-tailed weasel (*Mustela frenata*), and a number of small rodents and insectivores (Wray, 2013). Mammal species present at NSF Dahlgren include several bat species. Recent surveys have confirmed the presence of eight bat species: big brown bat (*Eptesicus fuscus*), eastern red bat (*Lasiurus borealis*), hoary bat (*Lasiurus cinereus*), silver-haired bat (*Lasionycteris noctivagans*), southeastern myotis (*Myotis austroriparius*), little brown bat (*Myotis lucifugus*), evening bat (*Nycticeius humeralis*), and tri-colored bat (*Perimyotis subflavus*) (NAVFAC Washington, 2017; NAVFAC Washington, 2018; NAVFAC Washington, 2019). The little brown bat and tri-colored bat are addressed in greater detail in Section 3.5.2.4.

The avian community at NSF Dahlgren is particularly diverse and includes a large number of migratory waterfowl that overwinter at the installation, as well as a large number of neotropical migrants that breed on-site (Wray, 2013). Many species of migratory birds protected under the Migratory Bird Treaty Act have the potential to occur at NSF Dahlgren, including the bobolink (*Dolichonyx oryzivorus*), buff-breasted sandpiper (*Calidris subruficollis*), lesser yellowlegs (*Tringa flavipes*), prothonotary warbler (*Protonotaria citrea*), red-headed woodpecker (*Melanerpes erythrocephalus*), red-throated loon (*Gavia stellata*), ruddy turnstone (*Arenaria interpres morinella*), rusty blackbird (*Euphagus carolinus*), semipalmated sandpiper (*Calidris pusilla*), whimbrel (*Numenius phaeopus*), and wood thrush (*Hylocichla mustelina*) (USFWS, 2020). Of these, lesser yellowlegs, rusty blackbird, and wood thrush have been observed at NSF Dahlgren in recent biological surveys (Wray, 2013). In addition, the peregrine falcon (*Falco peregrinus*) has been known to nest on the nearby Harry W. Nice Memorial Bridge (Nice Bridge) over the Potomac River and potentially forages on the installation (Chesapeake Conservancy, 2019); this species is addressed in greater detail in Section 3.5.2.4.

Bald eagles are known to occur on NSF Dahlgren; while this species has been delisted from the Endangered Species Act, it retains federal protection under the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act. NSF Dahlgren has 11 active bald eagle nests, the management of which are outlined in a Bald Eagle Management Plan and implemented in joint cooperation with VDGIF and USFWS (Wray, 2013). Gambo Creek Bridge is not located near any active bald eagle nests (Wray, 2019a).

The brackish intertidal marsh areas of Gambo Creek also provide habitat for some uncommon invertebrates, including blue-faced meadowfly (*Sympetrum ambiguum*) and unicorn clubtail (*Arigomphus villosipes*) (Wray, 2013).

Based on a Virginia Natural Heritage database search, the following state- or federal-listed animal species may potentially be present in the Northern Neck region of Virginia but were not analyzed further in this EA due to a low likelihood of presence within the project site: tiger salamander (*Ambystoma tigrinum*) and northeastern beach tiger beetle (*Cicindela dorsalis dorsalis*) (VDCR, 2019; VDGIF, 2019a; VDCR, 2008; USFWS, 2011b).

## 3.5.2.3 Marine Species

#### **Marine Vegetation**

Marine vegetation includes plants occurring in marine or estuarine waters. These may include algae and various grasses.

Submerged aquatic vegetation (SAV) beds grow in the intertidal area (also called the littoral zone) of the Potomac River and its tributaries, typically at depths of 6.6 feet or less during low tide. Annual SAV monitoring of Chesapeake Bay and its tributaries is conducted using aerial photography and field sampling. Recent aerial photography of the area around the installation did not reveal SAV densities great enough to be detected (Navy, 2013).

Upper Machodoc Creek is approximately 17 miles long, approximately 3,000 feet wide at the mouth, and about six feet deep. SAV is present most years in Upper Machodoc Creek near the mouth of Williams Creek, west of Gambo Creek. Prior to 2002, SAV was also generally found in the more upstream reaches of the creek (Navy, 2013). Species found include wild celery (*Vallisneria americana*), common waterweed (*Elodea canadensis*), coontail (*Ceratophyllum demersum*), and the invasive Eurasian watermilfoil (*Myriophyllum spicatum*). Gambo Creek is tidally influenced as far inland as the northern boundary of the installation. The creek is bordered by extensive tidal wetlands dominated by saltmarsh cordgrass (*Saltmarsh alterniflora*) and big cordgrass (*Spartina cynosuroides*).

#### Fish

Fish are vital components of the marine ecosystem that contribute great ecological and economic impact. NSF Dahlgren is located at the confluence of the Potomac River and Upper Machodoc Creek. This stretch of the Potomac River is the upper limit of the river's estuarine zone and is an ecologically important area providing adult, migratory, spawning, and nursery habitat for local and regional fish populations. Up to 31 fish species—including two federally listed anadromous sturgeon species that are discussed further in Section 3.5.2.4—are included in the aquatic fauna found in the Potomac River (NAVFAC Washington, 2016a).

Anadromous fish species, such as striped bass (*Morone saxatilis*), hickory shad (*Alosa mediocris*), American shad (*A. sapidissima*), alewife (*A. pseudoharengus*), blueback herring (*A. aestivalis*), white perch (*Morone americana*), threespine stickleback (*Gasterosteus aculeatus*), and sea lamprey (*Petromyzon marinus*), occur in the Potomac River. Wetlands associated with Gambo Creek and Upper Machodoc Creek may provide nursery habitat for these species, including the alewife and blueback herring (discussed in Section 3.5.2.4). The catadromous American eel (*Anguilla rostrata*) is also likely to be observed in the vicinity of the installation (Wray, 2013).

The Alliance for the Chesapeake Bay and NSF Dahlgren conducted fish sampling at two stations on the Potomac River and four stations on Upper Machodoc Creek between 1999 and 2002. A total of 27 fish species were collected at the Upper Machodoc Creek stations during these efforts. The most abundant species were white perch and Atlantic silverside (*Menidia menidia*) (Wray, 2013).

## **Essential Fish Habitat**

NOAA Fisheries works with the regional fishery management councils to identify the essential habitat— EFH—for every life stage of each federally managed fish species using the best available scientific information. EFH includes wetlands, coral reefs, seagrasses, and rivers, and all aquatic habitats where fish spawn, breed, feed, or grow to maturity. EFH has been designated for eight fish species in the vicinity of Gambo Creek at the confluence with the Potomac River. In accordance with the Magnuson-Stevens Fisheries Conservation and Management Act, consultation with NOAA Fisheries is required when any land use changes, shoreline stabilization, or military operations are planned that have the potential to affect EFH. EFH has been designated for the species listed in Table 3-6 in the vicinity of Gambo Creek, and descriptions of the species and their respective EFH follow. For context within the EFH descriptions below, the salinity of the Potomac River in the vicinity of NSF Dahlgren ranges from approximately 4 to 8 parts per thousand (ppt) (NAVFAC Washington, 2013). Ocean water is typically 35 ppt, and the Chesapeake Bay ranges from 25 to 30 ppt at its confluence with the Atlantic Ocean to 0.5 ppt at the head of the bay where it meets with freshwater rivers.

Of the species listed in Table 3-6, little skate, Atlantic herring, winter skate, and clearnose skate would not be expected to occur in the mixing salinity zone of Gambo Creek and the Potomac River as these species are found in high-salinity zones. Therefore, these four species are not discussed further.

Common Name Scientific Name		Eggs	Larvae	Juveniles	Adults
Bluefish	Pomatomus saltatrix	_	—	Yes	Yes
Summer flounder	Paralichthys dentatus		_	Yes	Yes
Little skate	Leucoraja erinacea		_	—	Yes
Atlantic herring	Clupea harengus	_	—	Yes	Yes
Red hake	Urophycis chuss	Yes	Yes	Yes	Yes
Windowpane flounder	Scophthalmus aquosus	—	—	Yes	-
Winter skate	Leucoraja ocellata	—	—	—	Yes
Clearnose skate	Raja eglanteria	_	—	Yes	Yes

 Table 3-6
 Essential Fish Habitat and Life Stages Near Proposed Action

Source: NOAA Fisheries, 2019a.

**Bluefish (***Pomatomus saltatrix***):** Bluefish is a highly migratory, schooling pelagic species found along the Atlantic coast. EFH for juvenile and adult bluefish includes the pelagic water column and inland with the mixing and seawater zones between 0.5 and 25 ppt, and greater than 25 ppt salinity, respectively. Generally, in Mid-Atlantic estuaries, juvenile bluefish occur from May through October and adult bluefish occur from April through October within the "mixing" and "seawater" zones.

**Summer Flounder (***Paralicthys dentatus***):** EFH for juvenile and adult summer flounder includes bottom waters, including tidal guts. Juveniles may use estuarine habitats, such as salt marsh creeks, SAV beds, and open bay areas as nursery areas, in salinities from 10 to 30 ppt. Adults generally inhabit shallow estuarine waters during warmer months.

**Red Hake (***Urophycis chuss***):** Egg and larvae habitats for red hake includes the seawater salinity zone of the Chesapeake Bay. Juvenile and adult seasonal visitors in the Chesapeake Bay are common during the late winter and spring months. The species occurs in the deeper channels of the bay mainstem as well as the deep channels of Hampton Roads Harbor and occasionally in the upper bay extending as far north as the Patuxent River. However, juvenile and adult habitats normally occur within the seawater salinity zone of the Chesapeake Bay.

**Windowpane Flounder (***Scopthalmus aquosus***):** EFH for juvenile windowpane flounder includes bottom habitats with a substrate of mud of fine-grained sand, water temperatures below 77 degrees Fahrenheit, and salinities between 5.5 and 36 ppt.

No Habitat Areas of Particular Concern are present within the project site (NOAA Fisheries, 2019a).

#### **Benthic Invertebrates**

Animals that live on the sea floor are called benthos. Most of these animals lack a backbone and are called invertebrates. Benthic invertebrates include sea anemones, sponges, corals, sea stars, sea urchins, worms, bivalves, crabs, and many more.

The blue crab (*Callinectes sapidus*) and American oyster (*Crassostrea virginica*) are commercially important shellfish found in the waters around NSF Dahlgren. Other benthic insects and crustaceans are likely to be observed in the vicinity of the installation.

## 3.5.2.4 Rare, Threatened, and Endangered Species

All potential rare, threatened, and endangered species that may occur on NSF Dahlgren are summarized in Table 3-7. There is no designated critical habitat for any species on NSF Dahlgren (USFWS, 2020). The VDCR Division of Natural Heritage verified that the Proposed Action would not affect any documented state-listed plants or insects (see correspondence in Appendix B).

## Sensitive Joint-Vetch (Aeschynomene virginica)

Sensitive joint-vetch is a plant species that occurs in fresh to slightly brackish tidal river systems, within the intertidal zone, typically occurring at the outer fringe of marshes or shores (USFWS, 2010). A rare plant survey for several target species known to occur in the vicinity of NSF Dahlgren was completed in 2004. Although potential habitat exists for sensitive joint-vetch, the species was not found in the areas surveyed on the installation (Wray, 2013). An additional survey for sensitive joint-vetch was conducted in 2017, and no plants were found. No critical habitat for sensitive joint-vetch exists on NSF Dahlgren (USFWS, 2020).

## Monarch Butterfly (Danaus plexippus)

The USFWS is currently reviewing the status of the monarch butterfly. The monarch butterfly is a wideranging species that, over the course of several generations, migrates between summer habitat in the northern United States and Canada and winter habitat in Mexico (USFWS, 2019c). Monarch have been observed using the habitat at NSF Dahlgren; it is very likely that the monarch uses habitat at NSF Dahlgren during its seasonal migration.

## Rusty-Patched Bumblebee (Bombus affinis)

The rusty-patched bumblebee was listed as federally endangered in 2017 (USFWS, 2019d). The species typically inhabits open grasslands and tallgrass prairies of the Upper Midwest and Northeast (USFWS, 2017a), though it was observed in 2014 at Sky Meadows State Park in Paris, Virginia, which is over 65 miles away from NSF Dahlgren (Johnson, 2018). There have been no sightings of this species at NSF Dahlgren, and it is not expected to be present due to the lack of suitable grassland habitat.

## Dwarf Wedgemussel (Alasmidonta heterodon)

Dwarf wedgemussel is a small, freshwater mollusk found in a variety of substrate types (including clay, sand, gravel and pebble), and sometimes in silt depositional areas near banks. It inhabits small streams to large rivers, and typically inhabits hydrologically stable areas, including very shallow water along streambanks, but has also been found at depths of 25 feet (USFWS, 2017b). Because this is a freshwater mussel, it would not be expected at the project location in Gambo Creek, which is tidally influenced and brackish near the confluence into the Potomac River. This species has not been documented at NSF Dahlgren (Wray, 2013; Wray, 2019b).

# Table 3-7Rare, Threatened, and Endangered Species Known to Occur or Potentially<br/>Occurring at the Project Site, and Critical Habitat at the Project Site

Common Name Scientific Name		Federal Listing	State Listing	Critical Habitat
		Status	Status	Present?
Plants				
Sensitive joint-vetch	Aeschynomene virginica	FT	ST	No
Invertebrates				
Monarch butterfly	Danaus plexippus	Under Review	None	No
Rusty-patched bumble bee	Bombus affinis	FE	None	No
Dwarf wedgemussel <sup>1</sup>	Alasmidonta heterodon	FE	SE	No
Fish				
Atlantic sturgeon	Acipenser oxyrinchus	FE	SE	No
Shortnose sturgeon	Acipenser brevirostrum	FE	SE	No
Alewife	Alosa pseudoharengus	—	SGCN	No
Blueback herring	Alosa aestivalis	—	SGCN	No
Reptiles				
Northern red-bellied	Pseudemys rubriventris	Under Review	None	No
cooter				
Spotted turtle	Clemmys guttata	Under Review	SGCN	No
Birds				
Peregrine falcon	Falco peregrinus	D; MBTA	ST	No
Eastern black rail <sup>1</sup>	Laterallus jamaicensis jamaicensis	FP	SE	No
Loggerhead shrike	Lanius ludovicianus	—	ST	No
Migrant loggerhead shrike Lanius ludovicianus migrans		—	ST	No
Henslow's sparrow	Centronyx henslowii	—	ST	No
Mammals				
Northern long-eared bat	Myotis septentrionalis	FT	ST	No
Tri-colored bat	Perimyotis subflavus	Under Review	SE	No
Little brown bat	Myotis lucifugus lucifugus	Under Review	SE	No

Sources: Wray, 2013; VDCR, 2019; USFWS, 2019c; VDGIF, 2020a.

Key: D = delisted; FE = federal endangered; FP = federal proposed; FT = federal threatened; MBTA = Migratory Bird Treaty Act; SE = state endangered; SGCN = species of greatest conservation need (state designation); ST = state threatened.

Note: <sup>1</sup>This species was not included on the USFWS IPaC Species Report for this site (USFWS, 2019c); it was included as a species potentially present within two miles of the project area based on the VDGIF's online database, VaFWIS (VDGIF, 2020a).

## Atlantic Sturgeon (Acipenser oxyrinchus) and Shortnose Sturgeon (A. brevirostrum)

A limited number of shortnose sturgeon are currently found in the Potomac River, and the Atlantic sturgeon is well documented in the Potomac River. Through its Integrated Natural Resources Management Plan (Wray, 2013), NSF Dahlgren implements management practices to minimize potential impacts on these anadromous sturgeon species.

It is likely that sturgeons are present during the summer months in the Potomac River based on information collected from June through September. The locations of the sturgeon collected by the reward program are based on where fishermen are setting their fishing gear (Navy, 2013). Therefore, the sturgeon captures on the Potomac River may or may not reflect areas preferred by sturgeon.

Atlantic sturgeon spawning is thought to take place between the salt front and fall line of large rivers. In the Potomac River, this area is located below Little Falls Dam and extends up to Great Falls. However, there are no records of Atlantic sturgeon spawning in the Potomac River. In the Potomac River, a total of 226 Atlantic sturgeon have been reported, primarily through the Sturgeon Reward Program. Most Atlantic sturgeon have been captured below the Nice Bridge. The number reported varies annually and was highest from 2005 to 2008. The yearly fluctuations in the number of captures are thought to reflect changes in the sturgeon population. There seem to be stronger year classes of sturgeon that move up into the Chesapeake Bay in certain years but not others (Navy, 2013). It is considered highly unlikely that either Atlantic or shortnose sturgeon would be present within Gambo Creek due to the small size of the creek and the shallow water depth at the mouth of the creek (Balazik, 2019).

## Alewife (Alosa pseudoharengus) and Blueback Herring (A. aestivalis)

NOAA Fisheries recently reviewed the listing status of alewife and blueback herring and determined that listing either species as threatened or endangered at this time is not warranted; however, NOAA Fisheries noted there were significant data deficiencies such that their listing status would be reviewed in three to five years (NOAA Fisheries, 2019b). These species are found in the Potomac River and potentially occur in Gambo Creek (Wray, 2013). The alewife and blueback herring are anadromous species that migrate upstream to spawn in freshwater before returning to the sea. Spawning occurs in the spring, with the alewife first migrating upstream when water temperatures reach 51 degrees Fahrenheit, followed by blueback herring once temperatures reach 57 degrees (USFWS, n.d.[a]).

## Northern Red-bellied Cooter (Pseudemys rubriventris)

The USFWS is currently reviewing the status of the northern red-bellied cooter. The species is relatively common within its core range of Maryland, Virginia, Delaware, and New Jersey, and it frequents tidal waters near the mouths of rivers. However, the red-bellied cooter has declined across its range and has been petitioned for federal listing under the Endangered Species Act (DoD PARC, 2017). Habitat requirements include a soft bottom and numerous basking sites, with aquatic plants present. NSF Dahlgren provides suitable habitat for the species, and it is relatively common on the installation. It was well documented during a 2014 herpetofauna survey (Wray, 2019b).

## Spotted Turtle (Clemmys guttata)

The USFWS is currently reviewing the status of the spotted turtle. This species is semiaquatic and can be found in a variety of shallow water bodies including streams, swamps, marshes, bogs, and permanent or seasonal pools and ponds. There is a historical record of spotted turtle on NSF Dahlgren from a 1977 survey, but the 2014 herpetofauna survey did not find the species on the installation. However, since the 2014 survey, two spotted turtle observations have been reported (Wray, 2019b).

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## Peregrine Falcon (Falco peregrinus)

The peregrine falcon potentially uses the installation and nearby Potomac River as foraging habitat but is very unlikely to nest anywhere on the installation. This species requires cliffs or tall man-made structures for nesting (VDGIF, 2019b). The majority of peregrine falcons in Virginia nest within the Coastal Plain region on tall artificial structures, and peregrine falcons have been known to nest in the past on the nearby Nice Bridge over the Potomac River (VDGIF, 2019b; Chesapeake Conservancy, 2019).

# Eastern Black Rail (Laterallus jamaicensis jamaicensis)

Eastern black rail is proposed for listing as threatened under the Endangered Species Act. This species is found in salt, brackish, and freshwater marshes, either tidally or non-tidally influenced. In the northeastern United States, eastern black rail is typically found in marshes with dense cover, but it can also be found in upland areas of these marshes (USFWS, n.d.[c]). It is known to occur in King George County seasonally in the spring and summer (VDGIF, 2020b). The habitat near the Gambo Creek bridge site is possibly suitable, though the species has not been documented at NSF Dahlgren (Wray, 2013; Wray, 2019b).

# Loggerhead Shrike (Lanius ludovicianus) and Migrant Loggerhead Shrike (Lanius ludovicianus migrans)

Loggerhead shrike is found in grasslands, orchards, and open areas with scattered trees (VDGIF, 2015). The majority of the known population within Virginia are west of the Blue Ridge Mountains, though it was historically widely distributed across the Commonwealth (VDGIF, 2018). Migrant loggerhead shrike is a subspecies. It is called "migrant" because it migrates further south in the winter. Migrant individuals are rarely distinguished during field identification, so the subspecies is not typically distinguished (VDGIF, 2020c). The habitat near Gambo Creek Bridge is not typical habitat for loggerhead shrike, and the species has not been documented at NSF Dahlgren (Wray, 2013; Wray, 2019b).

## Henslow's Sparrow (Centronyx henslowii)

Henslow's sparrow habitat includes open fields and meadows with grass interspersed with weeds or shrubby vegetation, especially in areas that are damp or low-lying or adjacent to salt marsh (VDGIF, 2015). The habitat near the Gambo Creek Bridge site is possibly suitable, though the species has not been documented at NSF Dahlgren (Wray, 2013; Wray, 2019b). In addition, Henslow's sparrow in not known or likely to occur within King George County according to the VDGIF's online database, VaFWIS (VDGIF, 2020d).

## Northern Long-Eared Bat (Myotis septentrionalis)

The northern long-eared bat has not been observed on NSF Dahlgren (Wray, 2013), but it has the potential to occur in the region and is considered by USFWS to be potentially affected by activities in the area (USFWS, 2020). The northern long-eared bat is found across much of the eastern and northcentral United States. The species is affected by white-nose syndrome, resulting in the species declining by up to 99 percent from pre-white-nose syndrome levels (USFWS, n.d.[b]). Acoustic monitoring surveys were conducted at NSF Dahlgren in 2015, 2017, 2018, and 2019, and mist net surveys were conducted in 2017 and 2019 to provide an inventory of bat species present at the installation, including the northern long-eared bat. The species was not detected on the installation (NAVFAC Washington, 2017; NAVFAC Washington, 2018; NAVFAC Washington, 2019). Known northern long-eared bat hibernacula within Virginia are limited to near the western border of the state, over 100 miles away; there are no known hibernacula near NSF Dahlgren. The nearest known occupied maternity roost is approximately 188 miles away (VDGIF, n.d.).

## Tri-colored Bat (Perimyotis subflavus)

The tri-colored bat is present at NSF Dahlgren. This species was detected along a tributary to Gambo Creek located approximately a half-mile northwest of the project location. This species has not been physically captured at the installation (NAVFAC Washington, 2019; NAVFAC Washington, 2017; NAVFAC Washington, 2018). The nearest known hibernaculum location is over 100 miles to the southwest, near Charlottesville, Virginia (VDGIF, 2019c). This species uses both trees and human structures as maternity roosts (VDGIF, 2016).

# Little Brown Bat (Myotis lucifugus lucifugus)

The little brown bat is present at NSF Dahlgren. This species was detected along a tributary to Gambo Creek located approximately a half-mile northwest of the project location. This species has not been physically captured at the installation (NAVFAC Washington, 2019; NAVFAC Washington, 2017; NAVFAC Washington, 2018). The nearest known hibernaculum location is over 100 miles to the southwest, near Charlottesville, Virginia (VDGIF, 2019c). This species uses both trees and human structures as maternity roosts (VDGIF, 2016).

## 3.5.3 Environmental Consequences

This analysis focuses on wildlife or vegetation types that are important to the function of the ecosystem or are protected under federal or state law or statute. The potential for short- and long-term impacts is considered. The analysis for potential impacts on marine species considers the potential for impacts that may change the water quality, including both improvements and degradation of current water quality.

# 3.5.3.1 No Action Alternative

Under the No Action Alternative, the Proposed Action would not occur, and there would be no change in baseline conditions of biological resources. Therefore, no significant impacts on biological resources would occur with implementation of the No Action Alternative. **Biological Resource Potential Impacts:** 

- No Action: No change in baseline conditions. No significant impacts.
- Alternative 1: Short-term, negligible impacts on terrestrial wildlife, Atlantic and shortnose sturgeon, bald eagle, northern long-eared bat, tri-colored bat, little brown bat, peregrine falcon, and eastern black rail. Short-term, minor impacts on vegetation, aquatic habitat, SAV, alewife, blueback herring, red hake, monarch butterfly, red-bellied cooter, and spotted turtle. No significant impacts.
- Alternative 2: Short-term, negligible impacts on Atlantic and shortnose sturgeon, northern long-eared bat, tri-colored bat, little brown bat, peregrine falcon, and eastern black rail. Short-term, minor impacts on aquatic habitat, SAV, alewife, blueback herring, red hake, bald eagle, red-bellied cooter, and spotted turtle. Long-term, negligible impacts on vegetation, terrestrial wildlife, and monarch butterfly. No significant impacts.
- Alternative 3: Short-term, negligible impacts on Atlantic and shortnose sturgeon, northern long-eared bat, tri-colored bat, little brown bat, peregrine falcon, and eastern black rail. Short-term, minor impacts on SAV, alewife, blueback herring, red hake, red-bellied cooter, and spotted turtle. Long-term, negligible impacts on bald eagle and terrestrial wildlife. Long-term, minor impacts on vegetation aquatic habitat, and monarch butterfly. No significant impacts.

## 3.5.3.2 Alternative 1: Existing Bridge Alignment (Preferred Alternative) Potential Impacts

The study area for the analysis of effects on biological resources associated with Alternative 1 includes the lower portion of Gambo Creek and its confluence with the Potomac River, aquatic habitat, and surrounding vegetation in the vicinity of Alternative 1, with consideration for how changes during construction could affect other biological resources on the installation and surrounding community.

Short-term, negligible and minor, adverse impacts on biological resources would be expected from Alternative 1. Impacts would result from the following construction activities: bridge demolition, roadway construction, cofferdam installation, and pile driving for the new bridge. Construction activities would result in noise (including underwater acoustic noise resulting from pile driving), fugitive dust, increased sedimentation and turbidity within the water column, temporary alteration of the flow of Gambo Creek, and direct impacts on aquatic habitats (refer to Section 3.2.3.2 for impacts on wetlands). These would be short-term, negligible-to-minor impacts on biological resources on, near, and downstream of the project site. No long-term adverse impacts on biological resources are anticipated.

Implementation of Alternative 1 would not result in significant impacts on biological resources, as discussed in the following subsections.

#### Vegetation

Under conservative estimates, the construction of the proposed bridge to replace the current bridge at the existing alignment would result in the loss of up to 3,340 square feet of trees and the disturbance of as much as 63,860 square feet of wetland habitat (refer to Section 3.2 for impacts on wetlands). Minimal permanent loss of habitat would be expected.

#### **Terrestrial Wildlife**

Short-term, negligible impacts on terrestrial wildlife species could occur from noise and disturbance associated with construction activities at the project site. Increases in noise levels from construction activities would be temporary. Minimal loss of forest and scrub-shrub habitat is expected to occur. Impacts on rare, threatened, or endangered terrestrial wildlife are discussed in that subsection.

The study area is in a region that serves as bald eagle foraging habitat but is not located within any buffer areas for active nests on NSF Dahlgren (Wray, 2013). Any impacts on this species resulting from Alternative 1 would be short term and negligible, given the abundance of foraging habitat in the surrounding area. Migratory birds at NSF Dahlgren may be temporarily displaced as a result of Alternative 1 but would be expected to relocate to similar habitats nearby.

VDGIF reviewed the Draft EA as part of this project's Federal Consistency Determination (Appendix B). Recommendations to minimize impacts on wildlife resources are included in this letter, including conducting tree removal and ground clearing outside the primary songbird season of March 15 through August 15, as well as other specific construction timing and methods. The Navy will consider these recommendations during the design process to meet project requirements and minimize potential impacts on terrestrial resources.

## **Marine Species**

Implementation of Alternative 1 would temporarily affect the water quality of Gambo Creek and the downstream Potomac River. Ground-disturbing activities lead to increased sedimentation and turbidity. Increased sediments and water turbidity adversely affect aquatic life by reducing light, which is necessary for aquatic plants. Localized loss of SAV coverage reduces habitat and sometimes prey

availability for the invertebrate and fish species using that area. Sediments in the water column can also smother SAV or clog fish gills. Construction would directly affect Gambo Creek as construction occurs, and indirectly affect downstream water bodies. These impacts would be minimized through BMPs to protect against soil erosion and sedimentation into receiving water bodies. Sediments in this area of Gambo Creek may also be contaminated; disturbance of contaminants could be adverse on aquatic life when these contaminants are ingested, resulting in toxicity or possibly bioaccumulation in the food chain. As a precaution, soil and sediment samples would be taken prior to construction to determine if contaminants are present, and the Navy would remove and dispose of contaminated soil wastes appropriately.

The use of cofferdams during bridge construction would adversely affect Gambo Creek by altering the flow of the creek during construction. Cofferdams would be used as necessary for installing new bridge piers and would not completely block flow during construction activities. Cofferdams and construction equipment within Gambo Creek would likely loosen and introduce sandy sediments into the creek, increasing turbidity and reducing water quality. Although increases in turbidity may occur, impacts would be localized and temporary, lasting only as long as equipment and materials are used within the creek bed. After construction activity is complete, sedimentation and turbidity levels would return to preconstruction levels. Any potential impacts on SAV (e.g., reduced light for photosynthesis, direct loss during construction) would be short term and minor as SAV would be expected to recover following construction.

VDGIF reviewed the Draft EA as part of this project's Federal Consistency Determination (Appendix B), noting that Gambo Creek is designated as a Potential Anadromous Fish Area, and the Potomac River just downstream is a Confirmed Anadromous Fish Use Area. Recommendations to protect fisheries resources are included in this letter, including restricting in-water work outside of February 15 through June 30 and other specific construction timing and methods. The Navy will consider these recommendations during the design process to meet project requirements and minimize potential impacts on fisheries resources.

## Essential Fish Habitat

EFH is in the vicinity of Gambo Creek at its confluence with the Potomac River for eight species of fish. During the construction period for Alternative 1, fish may avoid the area immediately surrounding the Gambo Creek bridge due to in-water construction activity, increased noise, and a possible temporary decrease in water quality from turbidity. Impacts on EFH are summarized in the following text. In-water construction would occur in stages and would not at any time completely block the flow of Gambo Creek. As explained in Section 3.5.2.3, little skate, Atlantic herring, winter skate, and clearnose skate are unlikely to occur within the mixing salinity zone of Gambo Creek and the Potomac River and are not analyzed further.

**Bluefish:** Juvenile and adult bluefish EFH could be affected during construction activity. A highly mobile pelagic species, bluefish would be expected to avoid active construction areas, minimizing impacts on their EFH. Bluefish food sources would be available in adjacent, undisturbed areas. No long-term impacts on this EFH would be expected.

**Summer Flounder:** EFH occurs for juvenile and adult summer flounder, a bottom-dwelling species. Juvenile summer flounder are unlikely to occur within the salinity range that is present at the Gambo Creek and Potomac River area. Adult summer flounder are highly mobile and would be expected to vacate the area during active construction, minimizing impacts. No long-term impacts on this EFH would be expected.

**Red Hake:** EFH for all life stages of red hake is present in the seawater salinity zone of the Chesapeake Bay. While EFH occurs in the project vicinity, it is unlikely that the species would be present in any life stage. If the species is present in the egg or larval life stage, it could potentially experience short-term, minor impacts due to sedimentation. No long-term impacts on this EFH would be expected.

**Windowpane Flounder:** Windowpane flounder is a bottom-dwelling species that could be affected during construction activity. EFH occurs for juvenile and adult windowpane flounder, which is a highly mobile species. Individuals would be expected to vacate the area where active construction is occurring, thereby minimizing impacts. No long-term impacts on this EFH would be expected.

No Habitat Areas of Particular Concern are present within the project site.

Noise from construction activity, particularly from pile driving to support new bridge construction, would adversely affect EFH in the vicinity of Alternative 1. Underwater sound pressure caused by inwater pile driving could distress, injure, or kill fish in the vicinity. The thresholds of behavioral effects of pile-driving noise on fish that are considered harmful or harassment are not well known, and while fish may react to a sudden loud sound, they may also quickly habituate to the sound. NOAA Fisheries and USFWS generally use 150 decibels (root mean square) as the threshold for behavioral effects on Endangered Species Act-listed fish species, citing that this level and above can cause temporary behavioral changes that could decrease a fish's ability to avoid predators (CalTrans, 2015). Pile-driving activities could exceed this threshold. Avoidance and minimization measures and BMPs to reduce the impacts on fish and their habitat from pile-driving noise and sedimentation would be incorporated into the project during the design phase. Modifying the timing and duration of pile-driving so that this activity occurs outside of spawning season would also reduce impacts on fish within the vicinity.

As previously described, EFH in the vicinity of the project site is for highly mobile species and life stages, except egg and larval red hake. Juvenile and adult fish could avoid the project site during construction noise. The Navy would implement appropriate BMPs in accordance with regulations and ongoing consultation to reduce sound generated by construction activity, reducing the impact on fish in the vicinity. During construction, BMPs and minimization measures would be implemented on-land and inwater to minimize the effects of turbidity on EFH. This may include time of year restrictions, as recommended by NOAA Fisheries for in-water construction. BMPs may also include the number, size, composition, and installation methods of any piles or piers to be constructed across Gambo Creek, as well as the means by which the existing bridge is demolished. Minimization measure that would be used during bridge construction would include the use of dewatered cofferdams, turbidity curtains, vibratory vs. impact hammer, cushion blocks, and ramp-up at reduced energy, which would minimize the turbidity and acoustic impacts of construction. Final BMPs to minimize impacts on EFH would be determined based on further consultation with NOAA Fisheries.

The Navy initiated coordinated with NOAA Fisheries with an EFH Assessment Worksheet and supporting documentation via an email dated February 6, 2020, and information about the Draft EA in a letter dated February 13, 2020. NOAA Fisheries responded that conservation recommendations would depend on the means, methods, and materials selected for demolition of the existing bridge and construction of the new bridge. A formal review of the project and EFH impacts can be performed once the project moves beyond the conceptual phase. These communications are in Appendix B. The Navy will further

consult with NOAA Fisheries Habitat Conservation Division regarding potential impacts on EFH as bridge design and demolition plans are further developed.

#### Rare, Threatened, and Endangered Species

It is possible that alewife and blueback herring are present in or near Gambo Creek, and that the Atlantic and shortnose sturgeon are present downstream in the Potomac River, but not within Gambo Creek (Wray, 2013). Furthermore, the monarch butterfly (under review for listing), peregrine falcon (federally delisted, state threatened), northern red-bellied cooter (under review for listing), and tri-colored and little brown bat (federally under review, state endangered) likely use habitat within the study area. Spotted turtle (under review for listing) has been reported twice recently on NSF Dahlgren but is not common. Northern long-eared bat has not been observed on NSF Dahlgren but may be affected by activities in this region. Eastern black rail (state threatened) has not been documented at NSF Dahlgren, but habitat near the Alternative 1 site is possibly suitable, and the species is known to occur within King George County.

As discussed in Section 3.5.2.4, surveys have been conducted for sensitive joint-vetch; this species has not been documented at NSF Dahlgren and is unlikely to occur at the project site. Surveys have not been conducted for rusty-patched bumble bee, but as it prefers open grassland habitat, which is not present on NSF Dahlgren, it would not be expected to occur. Similarly, loggerhead shrike and migrant loggerhead shrike prefer open grassland habitat; the species is primarily found in western Virginia and would not be expected to occur on NSF Dahlgren. Henslow's sparrow is not known to occur within King George County and has not been observed on NSF Dahlgren. Dwarf wedgemussel is a freshwater mollusk and would not be expected to occur in the brackish waters of Gambo Creek. Therefore, no impacts on these species are expected.

## Monarch Butterfly

Vegetation that provides nectar and pollen is commonly found in scrub-shrub habitat along ecotones such as forest edges and in wetland habitat. Therefore, monarch butterflies likely use habitat at the project site during their annual migration. Potential impacts would be greatest from spring through the fall when this species lays its eggs on host plants. Outside of this period, between late fall and early spring, any indirect impacts on the species, via disturbance of wetlands and scrub-shrub habitat, is expected to be short term and minor. The Navy is currently preparing a Habitat Conservation Plan that promotes pollinator habitat for the monarch butterfly at NSF Dahlgren as well as updating the NSF Dahlgren Integrated Natural Resources Management Plan (Wray, 2019b). Vegetation clearing would be reviewed according to the installation's Comprehensive Work Approval Process to minimize impacts on the monarch butterfly. Alternative 1 would result in short-term, minor impacts on this species.

## Atlantic Sturgeon and Shortnose Sturgeon

A limited number of shortnose sturgeon have been found in the Potomac River, but the Atlantic sturgeon is well documented in the Potomac River. Through the NSF Dahlgren Integrated Natural Resources Management Plan (Wray, 2013), the Navy implements management practices to minimize potential impacts on these sturgeon species. Atlantic sturgeon and shortnose sturgeon are highly unlikely to be located within Gambo Creek (Balazik, 2019). The primary impacts from Alternative 1 potentially affecting these species are downstream sedimentation and acoustic disturbance (from pile driving).

Given the relatively small number of piles needed for the new bridge, a small area would be affected by noise from this activity. Considering the lack of sturgeons within Gambo Creek and the small number of sturgeons in the Potomac River, the probability of a sturgeon being affected by shockwaves associated with pile driving is extremely low.

Indirect effects on sturgeons from pile driving, cofferdam installation, and other bridge replacement work could include increased suspended sediments near the area where the bridge work is being conducted, impairment of water and/or sediment quality, and habitat disturbance (e.g., burial of prey by sediment resuspension). Under Alternative 1, it is anticipated that the sediments disturbed at the bridge site would quickly settle out of the water column and not affect populations of invertebrates that sturgeon feed upon. Increases in levels of suspended sediments caused by cofferdam installation and pile driving would be localized, and this short-term activity would briefly affect the levels of suspended sediments found in the water column.

There is no evidence that sturgeons are spawning in the Potomac River (Navy, 2013). However, if they were, Alternative 1 would not disrupt potential spawning of the shortnose or Atlantic sturgeon. The proposed bridge would have no physical overlap with the Gambo Creek–Potomac River confluence or potential spawning grounds at the head of tide in the vicinity of Little Falls above Washington, DC (Navy, 2013). Therefore, the effect of Alternative 1 on the shortnose and Atlantic sturgeon is expected to be short term and negligible.

The Navy coordinated with NOAA Fisheries in a letter dated March 18, 2020, concluding that replacing Gambo Creek Bridge would not adversely affect sturgeon species. On March 20, 2020, NOAA Fisheries Protected Resources Division concurred that listed sturgeon species would not be exposed to direct or indirect effects from this action, and that consultation under the Endangered Species Act is not necessary. These communications are in Appendix B.

#### Alewife and Blueback Herring

The potential for short-term, minor impacts on alewife and blueback herring would be higher during the spawning season, when eggs are being laid and fertilized. Spawning occurs in the spring, with the alewife first migrating upstream when water temperatures reach 51 degrees Fahrenheit, followed by blueback herring once temperatures reach 57 degrees (USFWS, 2019e). Peak spawning season for the alewife runs from late March through April in Virginia. Peak spawning season for the blueback herring runs from April through May. While adults return to the sea soon after spawning, juveniles remain in freshwater during the spring and summer, migrating seaward in the fall (Virginia Institute of Marine Science, 2019). Given the small-scale and short-lived nature of sediment disturbance associated with Alternative 1, there is only the potential for short-term, minor impacts on these species as a result of construction activities.

## Northern Red-bellied Cooter and Spotted Turtle

The northern red-bellied cooter is relatively common on NSF Dahlgren. The species is typically active from March through November, hibernating from December through February. The spotted turtle is not common on NSF Dahlgren, but two observations have been reported since 2014 (Wray, 2019b). Gambo Creek provides potential habitat for both species. The northern red-bellied cooter hibernates at the bottom of waterways by resting on the top of or burying itself into the mud bottom to a depth of three meters (Wray, 2019b). Spotted turtles rely on wetlands for overwintering, mating, foraging, and thermoregulating, and often use stream and river channels for dispersal and movements (DoD PARC, 2019). If present, both northern red-bellied cooter and spotted turtle would experience impacts under

Alternative 1, particularly if construction occurred during the winter when it is more likely that turtles may be hibernating in the waterway or mud in and immediately surrounding Gambo Creek. Consistent with the NSF Dahlgren Integrated Natural Resources Management Plant update, which is currently being drafted, the Navy would review proposed wetland disturbances and in-water work projects related to construction through the installation's Comprehensive Work Approval Process to eliminate or minimize impacts on these habitats (Wray, 2019b). Alternative 1 would result in short-term, minor impacts on these species.

#### Peregrine Falcon

The peregrine falcon has nested nearby at the Nice Bridge over the Potomac River in the past, but it likely only uses NSF Dahlgren as foraging habitat when hunting for prey (Chesapeake Conservancy, 2019). The presence of humans and heavy machinery during construction has the potential to temporarily reduce prey availability within the immediate area, but overall short-term impacts on this species are anticipated to be negligible, with no long-term impacts expected.

#### Eastern Black Rail

Eastern black rail has not been observed on NSF Dahlgren, but it has been determined to occur in the spring and summer in King George County. The species nests in grasses away from water (VDGIF, 2020e), so demolition and construction would not be expected to affect nesting birds. The presence of humans and heavy machinery during construction has the potential to temporarily disturb the species, if present, by affecting foraging and roosting areas. Overall short-term impacts on this species would be negligible to none, with no long-term impacts expected.

#### Northern Long-eared Bat

Multiple bat surveys have been conducted on this installation, with no presence of this species indicated via acoustic or mist-net surveys (NAVFAC Washington, 2017; NAVFAC Washington, 2018; NAVFAC Washington, 2019). The USFWS IPaC report generated for this project indicates that this species is potentially present (USFWS, 2020). However, to avoid potential impacts if the species were present and to fulfill project-specific section 7 responsibilities, the installation would conduct tree removal activities outside of the northern long-eared bat pup season (June 1–July 31). This allows NSF Dahlgren to rely upon the finding of the programmatic biological opinion for the 4(d) rule to fulfill its project-specific section 7 responsibilities (USFWS, 2019f). Following this measure, along with completing the determination key for this species in the IPaC process, allows the installation to avoid completing a formal section 7 consultation. It is anticipated that Alternative 1 would result in short-term, negligible impacts on this species. The determination key and self-certification letter are included in Appendix B.

#### Tri-colored Bat and Little Brown Bat

Both tri-colored and little brown bat have been determined to be present at NSF Dahlgren. These species were detected along a tributary to Gambo Creek located approximately a half-mile northwest of the project location. These species have not been physically captured at the installation (NAVFAC Washington, 2017; NAVFAC Washington, 2018; NAVFAC Washington, 2019). Following guidelines developed for the northern long-eared bat and avoiding tree removal activities during the pup season (June 1–July 31) would help to avoid potential impacts if these species happen to have a roost tree on or near the project location. It is anticipated that Alternative 1 would result in short-term, negligible impacts on these species.

# 3.5.3.3 Alternative 2: Southern Bridge Alignment Potential Impacts

The study area for the analysis of effects on biological resources associated with Alternative 2 is the same as for Alternative 1—the lower portion of Gambo Creek and its confluence with the Potomac River, associated aquatic habitat, and surrounding vegetation in the vicinity of Alternative 2, with consideration for how changes during construction could affect other water resources on the installation and surrounding community.

Short-term, negligible and minor, adverse impacts on biological resources would be expected from Alternative 2. Long-term, negligible, adverse impacts on vegetation and terrestrial wildlife would be expected from the tree loss that would occur. Impacts would result from the following construction activities: demolition of the existing bridge, creation of a new roadway approach for the new bridge that would be located south of the existing bridge and associated tree removal, installation of cofferdams, and pile driving for the new bridge. Construction activities would result in noise (including underwater acoustic noise resulting from pile driving), fugitive dust, increased sedimentation and turbidity within the water column, temporary alteration of the flow of Gambo Creek, loss of tree cover, and direct impacts on aquatic habitats (refer to Section 3.2.3.3 for impacts on wetlands). It is expected that these impacts would be short term and negligible to minor on biological resources on, near, and downstream of the project site. Overall, implementation of Alternative 2 would not result in significant impacts on biological resources, as discussed in the following subsections.

#### Vegetation

The construction associated with Alternative 2 would have long-term, negligible effects on up to 75,520 square feet of wetland habitat (refer to Section 3.2 for impacts on wetlands) that would be disturbed, and up to 10,790 square feet of trees that would be lost. Therefore, Alternative 2 would result in short-term, minor impacts on the vegetation present in aquatic habitats and long-term, negligible impacts on trees and scrub-shrub habitat present at the site.

## **Terrestrial Wildlife**

Short-term, negligible impacts on terrestrial wildlife species could occur from noise and disturbance associated with construction activities. Increases in noise levels from construction activities would be minor and temporary. There would also be some negligible, long-term impacts on terrestrial wildlife species due to the loss of a small area of scrub-shrub and forest habitat that would be converted into the roadway approach for the new bridge.

Similar to Alternative 1, impacts on bald eagles resulting from Alternative 2 would be short term and negligible, given the abundance of foraging habitat in the surrounding area. Migratory birds at NSF Dahlgren may be temporarily displaced from the project site but would be expected to relocate to similar habitats nearby.

## **Marine Species**

Impacts on marine resources under Alternative 2 would be similar to those described for Alternative 1, but some impacts would be greater due to the new bridge footprint and alterations to the roadway under Alternative 2, which could result in some increase in sedimentation. Any potential impacts on SAV (e.g., reduced light for photosynthesis, direct loss during construction) would be short term and minor as SAV would be expected to recover following construction. There would be a greater increase in impervious surface under Alternative 2 as compared to Alternative 1; therefore, the potential for

erosion and sedimentation would also increase, resulting in greater potential impacts on water quality and indirect impacts on aquatic vegetation, macroinvertebrates, and fish.

Implementation of Alternative 2 would temporarily affect the water quality of Gambo Creek and the downstream Potomac River. Ground-disturbing activities would lead to increased sedimentation and turbidity. Construction would directly affect Gambo Creek as construction occurs and indirectly affect downstream water bodies. These impacts would be minimized through BMPs to protect against soil erosion and sedimentation into receiving water bodies.

The use of cofferdams during bridge construction would affect Gambo Creek by altering the flow of the creek temporarily. Cofferdams and construction equipment within Gambo Creek would likely loosen and introduce sandy sediments into the creek, resulting in increases in turbidity and reducing water quality. Although increases in turbidity may occur, impacts would be localized and temporary, lasting only as long as equipment and materials are used within the creek bed. After construction activity is complete, sedimentation and turbidity levels would return to preconstruction levels.

## Essential Fish Habitat

Impacts on EFH under Alternative 2 would be similar to those described for Alternative 1, but some impacts would be greater due to the new bridge footprint and alterations to the roadway, which could result in increased sedimentation.

#### Rare, Threatened, and Endangered Species

Monarch butterfly, Atlantic and shortnose sturgeon, alewife and blueback herring, peregrine falcon, eastern black rail, northern red-bellied cooter, spotted turtle, tri-colored bat, and little brown bat may be present at or near the project site, and northern long-eared bat may be affected by activities in this region, and so these species are discussed further. As discussed in Section 3.5.2.4, sensitive joint-vetch, rusty-patched bumble bee, dwarf wedgemussel, loggerhead shrike and migrant loggerhead shrike, and Henslow's sparrow would not be expected to occur; therefore, no impacts on these species are expected.

## Monarch Butterfly

Similar to Alternative 1, monarch butterflies likely use habitat at the project site during their annual migration. Alternative 2 would result in the permanent loss of existing scrub-shrub and wetland habitat that may serve as a resource for the monarch butterfly, and the loss of existing habitat is a long-term, minor impact on the monarch butterfly. Vegetation clearing would be reviewed according to the installation's Comprehensive Work Approval Process to minimize impacts on the monarch butterfly.

## Atlantic Sturgeon and Shortnose Sturgeon

Impacts on shortnose sturgeon would be similar to those described under Alternative 1. Given the relatively small number of piles that need to be driven, the small area that would be affected by noise from this activity, and the small number of sturgeons in the Potomac River, the probability of a sturgeon being affected by shockwaves associated with pile driving is extremely low.

It is anticipated that the sediments disturbed at the bridge site would quickly settle out of the water column and not affect populations of invertebrates that sturgeon feed upon. Increases in levels of suspended sediments caused by cofferdam installation and pile-driving activity would be localized, and this short-term activity would briefly affect the levels of suspended sediments found in the water column. The effect of Alternative 2 on the shortnose and Atlantic sturgeon is expected to be short term

and negligible. On March 20, 2020, NOAA Fisheries Protected Resources Division agreed that listed sturgeon species would not be exposed to direct or indirect effects from this action, and that consultation under the Endangered Species Act is not necessary. Communications are in Appendix B.

#### Alewife and Blueback Herring

Similar to Alternative 1, the potential for short-term, minor impacts on the alewife and blueback herring would be higher during the spawning season, when eggs are being laid and fertilized. However, given the small-scale and short-lived nature of sediment disturbance associated with Alternative 2, there is only the potential for short-term, minor impacts on these species as a result of construction activities.

## Northern Red-bellied Cooter and Spotted Turtle

Similar to Alternative 1, short-term, minor impacts on these species could occur. Following the NSF Dahlgren Integrated Natural Resources Management Plan procedure to review the proposed project through the installation's Comprehensive Work Approval Process would minimize impacts on these turtle species, if present.

#### Peregrine Falcon

Similar to Alternative 1, it is anticipated that short-term impacts on this species would be negligible under Alternative 2, with no long-term impacts expected.

#### Eastern Black Rail

Similar to Alternative 1, the presence of humans and heavy machinery during construction and demolition has the potential to temporarily disturb the species, if present, by affecting foraging and roosting areas. Overall short-term impacts on this species would be negligible to none, with no long-term impacts expected.

#### Northern Long-Eared Bat

Similar to Alternative 1, it is anticipated that Alternative 2 would result in short-term, negligible impacts on this species. Avoidance measures would be followed, as detailed under Alternative 1. Documentation for northern long-eared bat is included in Appendix B.

#### Tri-colored Bat and Little Brown Bat

Similar to Alternative 1, it is anticipated that Alternative 2 would result in short-term, negligible impacts on these species. Following guidelines developed for the northern long-eared bat and avoiding tree removal activities during the pup season (June 1–July 31) would assist in avoiding potential impacts if these species have a roost tree on or near the project location.

## 3.5.3.4 Alternative 3: Parallel Bridge Alignment Potential Impacts

The study area for the analysis of effects on biological resources associated with Alternative 3 is the same as for Alternative 1—the lower portion of Gambo Creek, its confluence with the Potomac River, associated aquatic habitat, and surrounding vegetation in the vicinity of Alternative 3, with consideration for how changes during construction could affect other biological resources on the installation and surrounding community.

Short-term, negligible and minor, adverse impacts on biological resources would be expected from Alternative 3. Long-term, negligible, adverse impacts on the bald eagle and terrestrial wildlife would be expected from the permanent loss of trees and scrub-shrub habitat that would occur, as well as the permanent addition of a second bridge that would negligibly decrease bald eagle foraging habitat. Long-term, minor, adverse impacts on vegetation, wetlands, and the monarch butterfly would be expected due to the permanent loss of additional wetlands and scrub-shrub habitat. Construction activities would result in noise (including underwater acoustic noise resulting from pile driving), fugitive dust, temporary increased sedimentation and turbidity within the water column, temporary alteration of the flow of Gambo Creek, loss of tree cover, and direct impacts on aquatic habitats (refer to Section 3.2.3.4 for impacts on wetlands). It is expected that these impacts would be short term and negligible to minor on biological resources on, near, and downstream of the project site. Overall, implementation of the Alternative 3 would not result in significant impacts on biological resources, as discussed in the following subsections.

## Vegetation

The construction associated with Alternative 3 would have short-term, minor effects on vegetation. Alternative 3 would have long-term, minor effects on up to 70,190 square feet of wetland habitat (refer to Section 3.2 for impacts on wetlands) that would be disturbed and up to 8,290 square feet of trees that would be lost. This forested area would be converted into the roadway approach for the new bridge located to the south of the existing bridge. Therefore, Alternative 3 would result in short-term, minor impacts on vegetation present and long-term, minor impacts on the aquatic and terrestrial habitat present at the site, including trees and scrub-shrub habitat.

#### **Terrestrial Wildlife**

Short-term, negligible impacts on terrestrial wildlife species could occur from noise and disturbance associated with construction activities. Increases in noise levels from construction activities would be minor and temporary. There would also be some long-term, negligible impacts on terrestrial wildlife species due to the loss of a small area of scrub-shrub and forest habitat that would be converted into the roadway approach for the new bridge.

Similar to Alternative 1, impacts on bald eagles would be short term and negligible. While there would be a permanent loss of foraging habitat equal to the additional area of the new bridge footprint over the creek and wetlands, there is an abundance of foraging habitat in the surrounding area. Migratory birds at NSF Dahlgren could be temporarily displaced from the project site but would be expected to relocate to similar habitats nearby.

#### **Marine Species**

Impacts on marine resources under Alternative 3 would be similar to those described for Alternative 1, but some impacts would be greater due to the new bridge footprint and alterations to the bridge approaches, which could result in minor increases in sedimentation and impervious surface. Any potential impacts on SAV (e.g., reduced light for photosynthesis, direct loss during construction) would be short term and minor as SAV would be expected to recover following construction. There would be a greater increase in impervious surface under Alternative 3 as compared to Alternative 1; therefore, the potential for erosion and sedimentation would also increase, resulting in greater potential impacts on water quality and indirect impacts on aquatic vegetation, macroinvertebrates, and fish.

Implementation of Alternative 3 would temporarily affect the water quality of Gambo Creek and the downstream Potomac River. Ground-disturbing activities lead to increased sedimentation and turbidity. Construction would directly affect Gambo Creek as construction occurs and indirectly affect downstream water bodies. These impacts would be minimized through BMPs to protect against soil erosion and sedimentation into receiving water bodies.

The use of cofferdams during bridge construction would affect Gambo Creek by altering the flow of the creek during construction. Cofferdams would be used as necessary for installing new bridge piers and would not completely block flow during construction activities. Cofferdams and construction equipment within Gambo Creek would likely loosen and introduce sandy sediments into the creek, resulting in increases in turbidity and reducing water quality. Although increases in turbidity may occur, impacts would be localized and temporary, lasting only as long as equipment and materials are used within the creek bed. After construction activity is complete, sedimentation and turbidity levels would return to preconstruction levels.

#### Essential Fish Habitat

Impacts on EFH under Alternative 3 would be similar to those described for Alternative 1, but some impacts would be greater due to the new bridge footprint and alterations to the roadway, which could result in increased sedimentation.

#### Rare, Threatened, and Endangered Species

Monarch butterfly, Atlantic and shortnose sturgeon, alewife and blueback herring, peregrine falcon, eastern black rail, northern red-bellied cooter, spotted turtle, tri-colored bat, and little brown bat may be present at or near the project site, and northern long-eared bat may be affected by activities in this region, and so these species are discussed further. As discussed in Section 3.5.2.4, sensitive joint-vetch, rusty-patched bumble bee, dwarf wedgemussel, loggerhead shrike and migrant loggerhead shrike, and Henslow's sparrow would not be expected to occur; therefore, no impacts on these species are expected.

## Monarch Butterfly

Similar to Alternative 1, monarch butterflies likely use habitat at the project site during their annual migration. Alternative 3 would result in the permanent loss of existing scrub-shrub and wetland habitat that may serve as a resource for the monarch butterfly, and the loss of existing habitat is a long-term, minor impact on the monarch butterfly. Vegetation clearing would be reviewed according to the installation's Comprehensive Work Approval Process to minimize impacts on the monarch butterfly.

## Atlantic Sturgeon and Shortnose Sturgeon

Similar to Alternative 1, the primary potential impacts on sturgeon from Alternative 3 are sedimentation and acoustic disturbance (from pile driving). Under Alternative 3, it is anticipated that the sediments disturbed at the bridge site would quickly settle out of the water column and not affect populations of invertebrates that sturgeon feed upon. Increases in levels of suspended sediments caused by cofferdam installation and pile-driving activity would be localized, and this short-term activity would briefly affect the current levels of suspended sediments found in the water column. Similar to Alternative 1, the effect of Alternative 3 on the shortnose and Atlantic sturgeon is expected to be short term and negligible. On March 20, 2020, NOAA Fisheries Protected Resources Division agreed that listed sturgeon species would not be exposed to direct or indirect effects from this action, and that consultation under the Endangered Species Act is not necessary. Communications are in Appendix B.

## Alewife and Blueback Herring

Similar to Alternative 1, the potential for short-term, minor impacts on the alewife and blueback herring would be higher during the spawning season, when eggs are being laid and fertilized. However, given the small-scale and short-lived nature of sediment disturbance associated with Alternative 3, there is only the potential for short-term, minor impacts on these species as a result of construction activities.

## Northern Red-bellied Cooter and Spotted Turtle

Similar to Alternative 1, short-term, minor impacts on these species could occur. Following the NSF Dahlgren Integrated Natural Resources Management Plan procedure to review the proposed project through the installation's Comprehensive Work Approval Process would minimize impacts on these turtle species, if present.

## Peregrine Falcon

Similar to Alternative 1, it is anticipated that short-term impacts on this species are anticipated to be negligible under Alternative 3, with no long-term impacts expected.

## Eastern Black Rail

Similar to Alternative 1, the presence of humans and heavy machinery during construction and demolition has the potential to temporarily disturb the species, if present, by affecting foraging and roosting areas. Overall short-term impacts on this species would be negligible to none, with no long-term impacts expected.

## Northern Long-Eared Bat

Similar to Alternative 1, it is anticipated that Alternative 3 would result in short-term, negligible impacts on this species. Avoidance measures would be followed, as detailed under Alternative 1. Documentation for northern long-eared bat is included in Appendix B.

## Tri-colored Bat and Little Brown Bat

Similar to Alternative 1, it is anticipated that Alternative 3 would result in short-term, negligible impacts on these species. Following guidelines developed for the northern long-eared bat and avoiding tree removal activities during the pup season (June 1–July 31) would assist in avoiding potential impacts if these species have a roost tree on or near the project location.

# 3.6 Infrastructure

This section discusses infrastructure such as utilities (including water distribution, wastewater collection, stormwater management, energy distribution, and communications) and bridge facilities.

## 3.6.1 Regulatory Setting

EO 13834, *Efficient Federal Operations*, requires federal departments and agencies to meet statutory requirements related to energy and environmental performance in a manner that increases efficiency, optimizes performance, eliminates unnecessary use of resources, and protects the environment. Agencies are directed to ensure that new construction conforms to applicable energy efficiency requirements and sustainable design principles, to implement space utilization and optimization practices, and to annually assess and report on building conformance to sustainability metrics.

Chief of Naval Operations Instruction 4100.5E outlines the Secretary of the Navy's vision for shore energy management. The focus of this instruction is establishing the energy goals and implementing strategies to achieve energy efficiency.

DoD Instruction 2000.16 incorporates all Antiterrorism/Force Protection standards through October 2006. The standards require all DoD components to adopt and adhere to common criteria and minimum construction standards to mitigate antiterrorism vulnerabilities and terrorist threats.

## 3.6.2 Affected Environment

The following section describes the existing conditions for each of the infrastructure categories at Gambo Creek Bridge.

# 3.6.2.1 Facilities

The existing Gambo Creek Bridge carries Tisdale Road traffic over Gambo Creek at NSF Dahlgren. The bridge is a reinforced concrete structure supported by 120 wooden piles. It was constructed in 1940 and spans 493 feet. The bridge has experienced significant deterioration over the years, leading to weight limit restrictions being imposed. Without intervention, it is anticipated that the bridge deck and support components would continue to deteriorate and could ultimately result in bridge failure.

## 3.6.2.2 Utilities

NSF Dahlgren maintains and monitors the utility systems that support the installation and its tenants. In general, the current capacity of the utility systems is adequate to support the demand (Navy, 2013). The utilities discussed in this section are routed along the existing bridge structure and include potable water, wastewater, stormwater, energy, and communications. These utilities serve NSF Dahlgren installation personnel only.

## **Potable Water**

A 10-inch cast-iron watermain, owned and maintained by the Navy, conveys potable water across the existing bridge structure as part of a looped system providing potable water to installation personnel. The watermain is insulated and jacketed to minimize adverse impacts associated with being exposed to an open-air environment.

## Sanitary Sewer

An existing four-inch cast-iron sanitary sewer force main crosses the existing bridge structure. This force main conveys sanitary sewer from portions of NSF Dahlgren located east of the Gambo Creek Bridge to a sewage treatment plant approximately one mile southwest of Gambo Creek Bridge. The pumping facility associated with the force main consists of a duplex system with two pumps rated at 250 gallons per minute (Sowell, 2019). The Navy owns, operates, and maintains the sanitary sewage treatment plant and distribution system (Navy, 2013).

## Stormwater

Stormwater runoff from the existing bridge deck is discharged directly to Gambo Creek via a series of drains and six-inch cast iron piping along either side of the bridge. NSF Dahlgren maintains a SWPPP for its industrial areas, which requires the implementation of both structural and non-structural controls to reduce the impact of stormwater runoff to the maximum extent practicable (Navy, 2013).

#### Energy

A conduit containing three-phase electrical power is routed along the existing bridge. Dominion Virginia Power provides electrical power to NSF Dahlgren via a 35-kilovolt switching station near the Main Gate and distributes it through ten substations and switching stations (NAVFAC, 2016). The Navy owns, operates, and maintains the electrical transmission lines on NSF Dahlgren.

There is no natural gas service on the installation (Navy, 2013), and, subsequently, no known natural gas mains on or adjacent to Gambo Creek Bridge.

## Communications

Various communications lines cross the existing bridge, including a 25-pair coaxial cable with jacketing; a 100-pair telephone coaxial cable inside a rigid galvanized steel conduit; and multiple sealed galvanized steel conduits, ranging from two to eight inches, containing protected fiber optic lines. These communications lines are part of a looped system serving installation facilities (Sowell, 2019). Verizon provides telecommunications service, including telephone service, across the installation. The Navy owns the fiber optic network on the installation that connects to the Verizon hub. The network communication system is installed and maintained on-site.

## 3.6.3 Environmental Consequences

This section analyzes the magnitude of anticipated increases or decreases in public works infrastructure demands considering historic levels, existing management practices, and storage capacity; and evaluates potential impacts on public works infrastructure associated with implementation of the alternatives. Impacts are evaluated by whether they would result in the use of a substantial proportion of the remaining system capacity, reach or exceed the current capacity of the system, or require development of facilities and sources beyond those existing or currently planned.

## 3.6.3.1 No Action Alternative

Under the No Action Alternative, the Proposed Action would not occur. The current bridge would remain in use with minimal maintenance. The deterioration of the bridge deck and support components would continue under this alternative, possibly resulting in bridge failure and closure. Therefore, major impacts on the bridge structure would occur with implementation of the No Action Alternative. Infrastructure Potential Impacts:

- No Action: Ongoing minimal maintenance could result in bridge closure. Major impacts are possible.
- Alternative 1: Long-term, beneficial effects from a safer, more reliable bridge. No significant impacts.
- Alternative 2: Possible relocation of communications panels or lines. Long-term, beneficial effects from a safer, more reliable bridge. No significant impacts.
- Alternative 3: Possible relocation of communications panels or lines. Improvements over No Action for long-term safety and reliability, but less beneficial than Alternatives 1 or 2. No significant impacts.

## 3.6.3.2 Alternative 1: Existing Bridge Alignment (Preferred Alternative) Potential Impacts

The study area for infrastructure associated with Alternative 1 includes the existing Gambo Creek Bridge, portions of Tisdale Road immediately east and west of the bridge, a laydown area west of the existing bridge, and all associated utility infrastructure that cross Gambo Creek on the bridge structure.

#### Facilities

Alternative 1 includes construction of a new bridge that would be sized to provide safe two-way vehicular traffic and, at a minimum, would be capable of supporting the local fire department's heaviest vehicle. The bridge would be constructed with steel pile foundations and a prestressed concrete box beam structure. It would be designed to meet FHWA standards, providing a safer, more reliable structure that would require less structural maintenance than that provided in the No Action Alternative, resulting in beneficial effects. In addition to reliability, Alternative 1 would improve upon the No Action Alternative by facilitating two-way traffic without the current weight limit restrictions.

#### Utilities

Alternative 1 includes demolition and disposal of the existing utility lines (water, sewer, electric power, and communication lines) that cross Gambo Creek on the bridge structure. The utility lines would be disposed of using the same methods and adherence to regulations as other bridge demolition waste. The existing capacity or demand of these utilities would not change as a result of the bridge replacement. In addition, new utility lines will be constructed underground to replace the utility lines that cross Gambo Creek before the proposed bridge would be replaced under a separate action. Therefore, there would be no service disruptions during the construction of the bridge replacement and no impacts on utility service.

The Virginia Department of Health Office of Drinking Water reviewed the Draft EA as part of this project's Federal Consistency Determination (Appendix B), noting that there are two public groundwater wells within a one-mile radius (both of which support NSF Dahlgren facilities). The Navy would verify locations of utility lines during the design phases of the project and prior to initiating any ground-disturbing activities.

Implementation of Alternative 1 would not result in significant impacts on infrastructure.

## 3.6.3.3 Alternative 2: Southern Bridge Alignment Potential Impacts

The study area for infrastructure associated with Alternative 2 includes the existing Gambo Creek Bridge, portions of Tisdale Road east and west of the bridge, an approximately 50-foot-wide corridor south of the existing bridge, a laydown area west of the existing bridge, and all associated utility infrastructure that cross Gambo Creek on the bridge structure.

## Facilities

Like Alternative 1, Alternative 2 would construct a new bridge that would be sized to provide safe twoway vehicular traffic and, at a minimum, would be capable of supporting the local fire department's heaviest vehicle. Construction style, impacts, and improved conditions under Alternative 2 would be similar to those under Alternative 1, including providing a safer, more reliable structure that would require less structural maintenance than that provided in the No Action Alternative, as well as facilitating two-way traffic without the current weight limit restrictions, resulting in beneficial effects.

#### Utilities

With the proposed demolition and disposal of the existing utility lines (water, sewer, electric power, and communication lines) that cross Gambo Creek on the bridge structure, impacts under Alternative 2 would be similar to those under Alternative 1.

## 3.6.3.4 Alternative 3: Parallel Bridge Alignment Potential Impacts

The study area for infrastructure associated with Alternative 3 includes the existing Gambo Creek Bridge, portions of Tisdale Road east and west of the bridge, an approximately 50-foot-wide corridor south of the existing bridge, a laydown area west of the existing bridge, and all associated utility infrastructure that uses the bridge structure to cross Gambo Creek.

#### Facilities

Alternative 3 would rehabilitate the existing Gambo Creek Bridge and construct a new bridge to the south. The existing rehabilitated bridge would provide safe one-way travel but would maintain a weight limit restriction. The new bridge would be sized to provide safe one-way vehicular traffic in the opposite direction with the minimal capacity to support the local fire department's heaviest vehicle. Alternative 3 would improve upon the No Action Alternative by increasing reliability of the existing bridge and removing the current weight limit restriction to one-way traffic traveling from east to west, resulting in beneficial effects. The improved conditions associated with Alternative 3 would be less beneficial than those under Alternatives 1 and 2, as those alternatives facilitated two-way traffic without current weight limit restrictions.

#### Utilities

With the proposed demolition and disposal of the existing utility lines (water, sewer, electric power, and communication lines) that cross Gambo Creek on the bridge structure, impacts under Alternative 3 would be similar to those under Alternative 1.

## 3.7 Hazardous Materials and Wastes

This section discusses hazardous materials, hazardous waste, toxic substances, and contaminated sites.

## 3.7.1 Regulatory Setting

Hazardous materials are defined by 49 CFR section 171.8 as "hazardous substances, hazardous wastes, marine pollutants, elevated temperature materials, materials designated as hazardous in the Hazardous Materials Table, and materials that meet the defining criteria for hazard classes and divisions in 49 CFR part 173." Transportation of hazardous materials is regulated by the U.S. Department of Transportation regulations.

Hazardous wastes are defined by the Resource Conservation and Recovery Act (RCRA), as amended by the Hazardous and Solid Waste Amendments, as "a solid waste, or combination of solid wastes, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may (A) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or (B) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed." Certain types of hazardous wastes are subject to special management provisions intended to ease the management burden and facilitate the recycling of such materials. These are called universal wastes and their associated regulatory requirements are specified in 40 CFR part 273. Four types of

waste are currently covered under the universal waste regulations: hazardous waste batteries, hazardous waste pesticides that are either recalled or collected in waste pesticide collection programs, hazardous waste thermostats, and hazardous waste lamps such as fluorescent light bulbs.

Special hazards are those substances that might pose a risk to human health and are addressed separately from other hazardous substances. Special hazards include asbestos-containing material (ACM), polychlorinated biphenyls (PCBs), and lead-based paint (LBP). USEPA is given authority to regulate special hazard substances by the Toxic Substances Control Act (TSCA). Asbestos is also regulated by USEPA under the Clean Air Act and the Comprehensive Environmental Response, Compensation, and Liability Act.

The DoD established the Defense Environmental Restoration Program (DERP) to facilitate thorough investigation and cleanup of contaminated sites on military installations (active installations, installations subject to Base Realignment and Closure, and formerly used defense sites). The Installation Restoration Program and the Military Munitions Response Program are components of the DERP. The Installation Restoration Program requires each DoD installation to identify, investigate, and clean up hazardous waste disposal or release sites. The Military Munitions Response Program addresses nonoperational rangelands that are suspected or known to contain unexploded ordnance, discarded military munitions, or munitions constituent contamination. The Environmental Restoration Program is the Navy's initiative to address DERP.

# 3.7.2 Affected Environment

The Navy has implemented a strict Hazardous Material Control and Management Program and a Hazardous Waste Minimization Program for all activities. These programs are governed Navy-wide by applicable Office of the Chief of Naval Operations instructions and at the installation by specific instructions issued by the Base Commander. The Navy continuously monitors its operations to find ways to minimize the use of hazardous materials and to reduce the generation of hazardous wastes.

# 3.7.2.1 Hazardous Materials

Various activities on the installation use different types of hazardous materials including paints, aerosols, oils, cleaning solutions, solvents, photographic chemicals, petroleum products, ordnance and explosives, and fluorescent bulbs. Underground storage tanks meet federal and state regulatory requirements for leak detection, secondary containment, and corrosion protection, or they undergo release detection groundwater monitoring. Aboveground storage tanks also meet federal and state regulatory regulatory requirements and are visually monitored on a regular basis. NSF Dahlgren maintains a spill prevention control and countermeasures plan that details applicable spill contingencies, and a SWPPP for maintaining and monitoring the industrial areas where these hazardous materials are stored and used. The installation also has a pollution prevention program aimed at reducing use and controlling, managing, and reusing hazardous materials (Navy, 2013).

# 3.7.2.2 Hazardous Waste

NSF Dahlgren is a large-quantity generator under RCRA, which means the installation generates at least 2,200 pounds of nonacute or more than 2.2 pounds of acute hazardous waste per calendar month. Common hazardous wastes generated at the installation include corrosive solutions, waste paint-related materials, lead-contaminated floor mats and rags, spent halogenated and non-halogenated solvents, waste photographic process chemicals, solvents, petroleum products such as used lubricating oils, ordnance and explosive materials, ash from open burning of ordnance materials, contaminated soil, and spent and expired laboratory chemicals. Hazardous waste is stored at Building 1425 and prepared for transportation to an off-site permitted treatment, storage, and disposal facility (Navy, 2013).

# 3.7.2.3 Special Hazards (Asbestos Containing Materials, Lead Based Paint, Polychlorinated Biphenyls

Given the age of the existing Gambo Creek Bridge, it is possible that various components contain special hazards. ACMs were commonly used in pipe insulation, sprayed concrete/gunite, bridge expansion joints, gaskets around electrical components, and epoxy coatings. LBP was widely used prior to its ban in 1978. Similarly, PCBs were widely used in paint, caulk, and sealants prior to its ban in 1979.

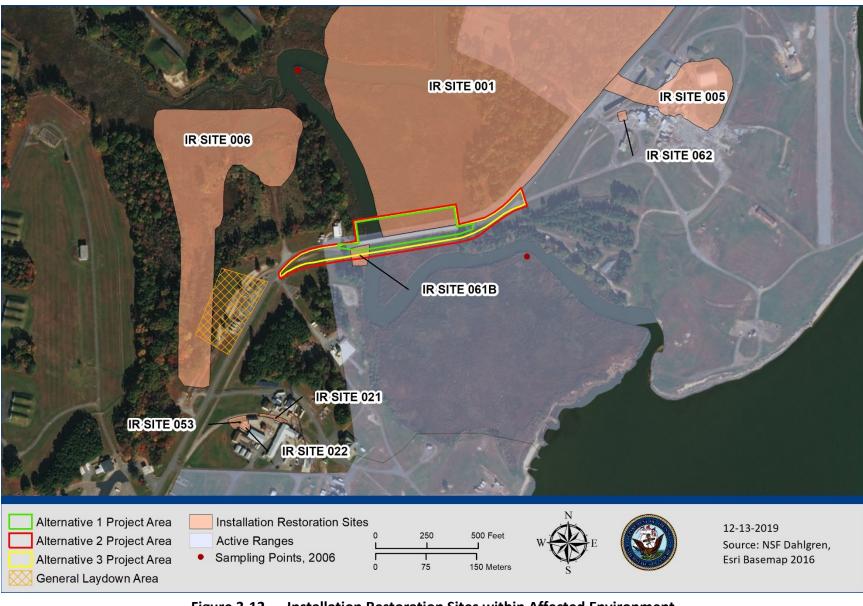
# 3.7.2.4 Defense Environmental Restoration Program

Prior to the 1970s, debris, scrap metal, ordnance, petroleum-based liquids, electronic equipment components containing PCBs, and other materials were commonly disposed of by placing these wastes into unlined landfills. Leaking underground storage tanks, oil-water separators, and industrial activities also inadvertently released petroleum materials into the environment. These historic practices at NSF Dahlgren resulted in numerous areas of contamination: 42 active and 34 closed IR sites (Navy, 2013; NAVFAC Washington, 2016a). Of these, only three IR sites—IR Site 001, IR Site 006, and IR Site 061B—are within or adjacent to the project site. Five other IR sites—IR Site 005, IR Site 062, IR Site 021, IR Site 022, and IR Site 053—are within approximately 1,000 feet of construction activities; however, these five sites are not expected to affect or be affected by the Proposed Action because of distance and/or no further action being needed for cleanup. Table 3-8 summarizes IR sites within the affected environment. Figure 3-12 shows the locations of these IR sites.

IR Site 001, the Old Bombing Range, covers approximately 293 acres within an active range. This area was used as a bombing range pre-1945. Cleanup actions at this site will not be determined or occur until the range is closed, which is not anticipated in the foreseeable future. No land uses other than range operations are permitted within IR Site 001 (TetraTech, 2017).

IR Site 006, Terminal Range Airplane Park/Solid Waste Management Unit 54, was used from the 1940s to 1992 to store scrap metallic items such as empty drums, inactive airplanes, and steel personnel and camera shelters; items waiting testing; drums of gun barrel preservative product; sandblasting agent product; and railroad ties and telephone poles. Waste drums were removed in 1992. Subsequent site investigation found semi-volatile organic compounds, pesticides, and metals in the soil and sediment, as well as evident transport of contaminants to the downgradient marshy area. Remediation included excavation with offsite disposal of buried wastes and contaminated soils and sediments in 2004. As part of the remediation, approximately 0.9 acre of new wetland was created, and this area was monitored until 2011 when it was determined that wetland restoration goals were achieved. This area is currently monitored for invasive species (TetraTech, 2017).

IR Site 061B, Gambo Creek Projectile Disposal Area, was a pile of gun projectiles of various sizes (three to eight inches in diameter), small pieces of scrap metal, and sand dating to the late 1930s to early 1940s. The projectiles appear to have been fired from a gun or used for ordnance testing operations (TetraTech, 2017). Site investigation found inorganics, volatile organic compounds, semi-volatile organic compounds, and pesticides in the surface soil, subsurface soil, surface water, and sediment, including contaminants of potential concern to human health risk in the surface soil and subsurface soil and other potential risks to ecological health and food chain bioaccumulation. Cleanup was achieved in 2004 by removing contaminated soil, scrap metals, and ordnance-related scrap. The Close-Out Decision



Installation Restoration Sites within Affected Environment Figure 3-12

Site Number	Site Name	Proximity to Project	Current Regulatory Status
IR Site 001	Old Bombing Range Projectile Disposal Area	IR Site 001 is adjacent to Gambo Creek Bridge, east of Gambo Creek, and north of Tisdale Road; bridge construction and/or demolition under any alternative would be adjacent to IR Site 001; temporary construction access for culvert installation would occur through IR Site 001 IR Site 005 adjoins IR Site 005	Decision Document—Action is deferred until the range is closed Decision Document—Action
		approximately 600 feet north of the estimated extent of construction disturbance from any alternatives; would not be affected by construction	is deferred until the range is closed
IR Site 006	Terminal Range Airplane Park	IR Site 006 partially overlaps a portion of the proposed laydown area	Record of Decision— Remedial Action Completed; Wetland Monitoring Underway
IR Site 021	Gun Barrel Decoppering Area	IR Site 021 is approximately 450– 500 feet south of the proposed laydown area; would not be affected by construction	Removal Action Completed; Decision Document— <b>No</b> Further Action
IR Site 022	Gun Barrel Degreasing Area	IR Site 022 is approximately 450– 500 feet south of the proposed laydown area; would not be affected by construction	Removal Action Completed; Decision Document— <b>No</b> Further Action
IR Site 053	Oil and Water Separator 207 300	IR Site 053 is approximately 450– 500 feet south of the proposed laydown area; not directly or indirectly affected by construction	Removal Action Completed; Decision Document— <b>No</b> <b>Further Action</b>
IR Site 061B	Gambo Creek Projectile Disposal Area	IR Site 006 overlaps the Alternative 2 and 3 project sites and is adjacent to the Alternative 1 project site	Closed— <b>No Further Action</b>
IR Site 062	Building 396	IR Site 062 is approximately 520 feet north of the estimated extent of construction disturbance from any alternatives; would not be affected by construction	Record of Decision-Remedial Investigation/Feasibility Study Completed; Removal Action Completed— <b>No</b> <b>Further Action</b>

Table 5-6 Summary of instantion Restoration Sites within Affected Environment	Table 3-8	Summary of Installation Restoration Sites within Affected Environment
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Sources: Navy, 2013; TetraTech, 2017.

Document recommending No Further Action was signed in 2005 (NAVFAC Washington, 2005; TetraTech, 2017). There are no records of radiological material being disposed of at the Gambo Creek Projectile Disposal Area. However, based on the period of operation, there is the potential that disposal of items containing radiological material in the vicinity of IR Site 061B did occur. To date, no radiological surveys of the soil at this site have been conducted, and it is unknown whether all debris were removed during remedial activities. Thus, while low, there is a possibility that radionuclides of potential concern could exist beneath the surface. An installation-wide assessment, including site investigations, is currently being performed by NAVFAC Washington to assess the potential for radiological issues.

Active ranges on NSF Dahlgren, which are not subject to the Military Munitions Response Program, likely contain munitions constituents or UXO. Munitions constituents include various organic compounds, explosive compounds, and polycyclic aromatic hydrocarbons, but metals are the predominant constituents (Navy, 2013). Gambo Creek Bridge is within an active range area (see Figure 3-12). Gunfiring locations are not near the general project site, but ranges pose the potential for contaminants released from munitions or UXO to migrate off-range. No recent sampling near Gambo Creek Bridge has been conducted, but two samples from a 2006 study were just upstream (~830 feet) and downstream (~1,140 feet) of the bridge, as shown on Figure 3-12. All samples in this general reach of Gambo Creek collected during the 2006 study detected numerous metals in creek sediments, including arsenic, barium, beryllium, cadmium, chromium, cobalt, copper, lead, manganese, mercury, nickel, selenium, silver, and zinc, though primarily at relatively low concentrations. The upstream sample shown on Figure 3-12 contained elevated manganese, which was determined to most likely be associated with IR Site 006 just west of the sample point; the downstream sample did not reveal elevated concentrations of any contaminants (JM Waller Associates, Inc. and Tetra Tech NUS, Inc., 2008).

## 3.7.3 Environmental Consequences

The hazardous materials and wastes analysis contained in the respective sections addresses issues related to the use and management of hazardous materials and wastes as well as the presence and management of specific cleanup sites at NSF Dahlgren.

## 3.7.3.1 No Action Alternative

Under the No Action Alternative, the Proposed Action would not occur, and there would be no change associated with hazardous materials and wastes. The Navy would continue to maintain the existing Gambo Creek Bridge. Conducting minimal maintenance as needed on small portions is the status quo, which would have negligible impacts on hazardous materials and wastes due to the very small quantities that could be used or generated for these repairs. Therefore, no significant impacts would occur with implementation of the No Action Alternative.

# 3.7.3.2 Alternative 1: Existing Bridge Alignment (Preferred Alternative) Potential Impacts

The study area for the analysis of effects on hazardous materials and wastes associated with Alternative 1 includes the existing bridge and immediately surrounding area (see Figure 3-12) where construction of the new bridge would occur, as well as the construction laydown area west of the project site.

Construction activities would use hazardous materials and generate hazardous wastes in small quantities. Common hazardous materials include diesel fuel, gasoline, propane, hydraulic fluids, oils, lubricants, and batteries. Common hazardous wastes include empty containers from hazardous materials, spent solvents, waste oil, lead-acid batteries, and any spill cleanup materials if used. Construction contractors are responsible for ensuring that the transport, use, storage, and disposal of hazardous materials and wastes complies with all applicable federal and state regulations. Adherence to policies, procedures, and regulations would minimize the potential impacts from exposure and accidental releases during construction. In the event of an accidental release, contaminated media would be treated on-site or would be promptly removed and disposed of in accordance with applicable Navy spill contingency plans and federal and state regulations.

Bridge demolition waste includes various components that could be hazardous waste or special hazards. The original bridge structure was constructed in 1940 as a railroad trestle, and then converted to a vehicular bridge, with attached utility conduits. Paints, coatings, joints, pipe insulation, gaskets, sprayed concrete, and any other materials potentially suspect for ACM, LBP, or PCBs must be properly characterized for appropriate disposal in accordance with federal and state regulations.

Much of the study area is within an active range. Areas where munitions are used or have historically been used may have organic compounds, explosive compounds, polycyclic aromatic hydrocarbons, and metals in soils or sediment. The study area on land for Alternative 1 that includes the existing bridge is previously disturbed and previously scanned for UXO; areas with potential for UXO, including the area north of the bridge that would provide temporary construction access to install cofferdams, would be scanned and cleared prior to disturbance. Soil and Hazardous Material and Waste Potential Impacts:

- No Action: Continued operations with existing management plans and policies that govern hazardous materials and wastes. No significant impacts.
- Alternative 1: Short-term impacts • associated with increased use of hazardous materials and generation of hazardous wastes. Demolished bridge components may contain special hazards; wastes would be characterized and disposed of appropriately. Short-term potential to encounter hazards associated with the active range and contamination from IR Site 001; surveys and clearing/remediation prior to beginning construction activities would occur. Short-term potential to encounter subsurface radionuclides of concern within IR Site 061B; proper health and safety procedures would be implemented for workers. No significant impacts.
- Alternative 2: Similar to but greater than Alternative 1 because of the larger project site, which increases use of hazardous materials and generation of hazardous waste, and the potential for munitions-related hazards and contamination and potential radionuclides. No significant impacts.
- Alternative 3: Similar to but slightly less that Alternative 2 because the bridge would not be demolished, which decreases potential for hazardous waste or special hazards. No significant impacts.

sediment samples would be taken and characterized prior to ground disturbance within range areas to determine if contaminants are present. The Navy would conduct further surveying as necessary to remove and dispose of contaminated soil wastes appropriately. Metals have been detected in Gambo Creek sediments associated with IR sites and munitions use (JM Waller Associates, Inc. and Tetra Tech NUS, Inc., 2008). In-water construction, such as pile-driving for foundations, would use cofferdams or other BMPs to minimize the potential for disturbing sediments and releasing contaminant plumes in the water.

Bridge demolition and construction would occur to the immediate south of IR Site 001, the Old Bombing Range. IR Site 001 is believed to have levels of contamination at or above concentrations that are dangerous to life or health from its historic use as a bombing range, as well as munitions constituents and UXO from its current use as a range. Remediation of the contamination at this site is indefinitely deferred until such time as the range closes. The bridge would be constructed south of the delineated boundaries of IR Site 001. However, temporary access to the creek for installing cofferdams would occur through this IR site. Furthermore, contaminant migration can be a dynamic occurrence. Soil and groundwater sampling along the project boundaries within and near IR Site 001 would identify whether off-site remediation and cleanup would be needed prior to bridge construction.

Bridge demolition and construction would also occur north of and partially within IR Site 061B, Gambo Creek Projectile Disposal Area. Contamination was remediated in 2004, and post-remediation surveying determined that IR Site 061B poses no potential for future release (NAVFAC Washington, 2005). The site is closed with no further action. There are no records of radiological material being disposed of at IR Site 061B. However, based on the period of operation, there is a low possibility that radionuclides of potential concern could exist beneath the subsurface. The Navy is conducting an installation-wide assessment, including site investigations, to determine the potential for radiological impact from sites including IR Site 061B, and would implement health and safety measures for workers within the Gambo Creek Projectile Disposal Area, including worker awareness training, monitoring, and scanning. Proper health and safety procedures regarding radiological material would be included in the project's approved work plan prior to the initiation of any groundwork. With proper monitoring and health and safety protection measures, no impacts from or on IR Site 061B would be expected.

The laydown area would be within a portion of IR Site 006, Terminal Range Airplane Park. Contamination was remediated in 1992, with long-term wetlands restoration and monitoring through 2011. This area is planned to be used for equipment and materials storage. No clearing, grading, digging, or other ground-disturbing activities are planned at this site. Therefore, no impacts from or on IR Site 006 would be expected.

For these reasons, implementation of Alternative 1 would not result in significant impacts from hazardous materials and wastes.

# 3.7.3.3 Alternative 2: Southern Bridge Alignment Potential Impacts

The study area for the analysis of effects on hazardous materials and wastes associated with Alternative 2 includes the existing bridge where demolition would occur, the area south of the existing bridge and surrounding area (see Figure 3-12) where construction of the new bridge would occur, and the construction laydown area west of the project site.

The potential impacts on hazardous materials and wastes would be essentially the same as those described under Alternative 1 in Section 3.7.3.2. The study area for Alternative 2 extends further south of Alternative 1; construction would entail the same considerations regarding use and generation of hazardous materials and wastes during construction activities; potential for hazardous waste and special hazards associated with ACM, LBP, and PCBs during demolition of the existing bridge; potential for contamination from IR Site 001 and munitions; and potential for radionuclides of concern to exist beneath the surface in IR Site 061B. As Alternative 2 involves a larger area for construction and road realignment, construction could generate higher quantities of hazardous materials and hazardous wastes, but still well within the limits of existing management plans. The Alternative 2 study area includes a larger area with potential for UXO and munitions to occur, as well as a larger area within IR Site 061B, compared with Alternative 1; these areas would require UXO scanning and clearing (as needed), soil and sediment sampling and removal (as needed) for munitions contaminants, and health and safety measures associated with possible radiological materials. Similar to Alternative 1, no impacts on or from IR Site 006 would be expected under Alternative 2. Therefore, implementation of Alternative 2 would not result in significant impacts from hazardous materials and wastes.

# 3.7.3.4 Alternative 3: Parallel Bridge Alignment Potential Impacts

The study area for the analysis of effects on hazardous materials and wastes associated with Alternative 3 includes the existing bridge where modification and repairs would occur, the area south of the existing bridge and surrounding area (see Figure 3-12) where construction of the new bridge would occur, and the construction laydown area west of the project site.

The potential impacts on hazardous materials and wastes would be similar to those described under Alternative 2 in Section 3.7.3.3; construction would entail the same considerations regarding use and generation of hazardous materials and wastes during construction activities; scanning and clearing for UXO; sampling for and removal of soil contaminated with munitions constituents from range use; and potential for contamination from IR Site 001 and munitions; and potential for radionuclides of concern to exist beneath the surface in IR Site 061B. The study area for Alternative 3 is generally the same as Alternative 2, but the existing bridge would undergo repairs and not be demolished. Some repair activities could involve removal or replacement of old materials potentially containing hazardous wastes or ACM, LBP, or PCBs, which would be properly characterized and disposed of, though the amount of waste would be minimal compared with Alternative 1 or Alternative 2. No impacts on or from IR Site 006 would be expected under Alternative 3. Therefore, implementation of Alternative 3 would not result in significant impacts from hazardous materials and wastes.

# 3.8 Summary of Potential Impacts on Resources

A summary of the potential impacts associated with each of the action alternatives and the No Action Alternative are presented in Table 3-9.

Resource Area	No Action Alternative	Alternative 1: Existing Bridge Alignment (Preferred Alternative)	Alternative 2: Southern Bridge Alignment	Alternative 3: Parallel Bridge Alignment
Air Quality	Minor regional increases from growth in the county. No significant impacts.	Short-term, minor emissions from operating heavy equipment during site preparation, construction, and demolition activities. No increases in the long term. No significant impacts.	Short-term, minor emissions from operating heavy equipment during site preparation, construction, and demolition activities. No increases in the long term. No significant impacts.	Short-term, minor emissions from operating heavy equipment during site preparation, construction, and demolition activities. No increases in the long term. No significant impacts.
Water Resources	No change in baseline conditions. No significant impacts.	Short-term, minor impacts on jurisdictional wetlands and water bodies from construction disturbance. New abutments and bridge aprons would require fill within jurisdictional wetlands. Any fill within jurisdictional wetlands would be permitted and mitigated in accordance with Section 404 of the Clean Water Act. With mitigations and Section 404 permitting for impacts on jurisdictional wetlands, no significant impacts.	Similar to Alternative 1, but with increased impacts on jurisdictional wetlands and surface waters due to the larger footprint. With mitigations and Section 404 permitting for impacts on jurisdictional wetlands, no significant impacts.	Similar to Alternative 1, but with increased impacts on jurisdictional wetlands and surface waters due to the larger footprint. With mitigations and Section 404 permitting for impacts on jurisdictional wetlands, no significant impacts.

Table 3-9Summary of Potential Impacts on Resource Areas

Resource Area	No Action Alternative	Alternative 1: Existing Bridge Alignment (Preferred	Alternative 2: Southern Bridge Alignment	Alternative 3: Parallel Bridge Alignment
		Alternative)		-
Geological Resources	No change in baseline conditions. No significant impacts.	Short- and long-term, minor effects from construction and increases in impervious surface. No significant impacts.	Short- and long-term, minor effects from construction and increases in impervious surface. No significant impacts.	Short- and long-term, minor effects from construction and increases in impervious surface. No significant impacts.
Cultural Resources	Long-term, minor, adverse effect on the Dahlgren Mainside Historic District due to bridge deterioration. No significant impacts.	Long-term adverse effect on the Dahlgren Mainside Historic District due to bridge demolition. Possibility for unanticipated discovery; SOP 5 would be followed. Potential long-term adverse effect on Site 44KG0157 due to bridge construction. With the execution of mitigation measures between the Navy and the SHPO in a PA, no significant impacts.	Long-term adverse effect on the Dahlgren Mainside Historic District due to bridge demolition. Possibility for unanticipated discovery; SOP 5 would be followed. Long- term adverse effect on Site 44KG0157 due to bridge and road construction. With the execution of mitigation measures between the Navy and the SHPO in a PA, no significant impacts.	Beneficial effects on the bridge due to planned repairs. Possibility for unanticipated discovery; SOP 5 would be followed. Long-term adverse effect on Site 44KG0157 due to bridge and road construction. With the execution of mitigation measures between the Navy and the SHPO in a PA, no significant impacts.

Resource Area	No Action Alternative	Alternative 1: Existing Bridge Alignment (Preferred Alternative)	Alternative 2: Southern Bridge Alignment	Alternative 3: Parallel Bridge Alignment
Biological Resources	No change in baseline conditions. No significant impacts.	Short-term, negligible impacts on terrestrial wildlife, Atlantic and shortnose sturgeon, bald eagle, northern long-eared bat, tri-colored bat, little brown bat, peregrine falcon, and eastern black rail; these resources would be only temporarily or indirectly affected, if at all, during construction activities. Short- term, minor impacts on vegetation, aquatic habitats, SAV, alewife, blueback herring, red hake, monarch butterfly, red-bellied cooter, and spotted turtle; these resources could occur within the project area and be affected by construction but affected habitat and duration would be minimal. No significant impacts.	Short-term, negligible impacts on Atlantic and shortnose sturgeon, northern long-eared bat, tri-colored bat, little brown bat, peregrine falcon, and eastern black rail; these resources would be only temporarily or indirectly affected, if at all, during construction activities. Short- term, minor impacts on aquatic habitats, SAV, alewife, blueback herring, red hake, bald eagle, red-bellied cooter, and spotted turtle; these resources could occur within the project area and be affected by construction but affected habitat and duration would be minimal. Long-term, negligible impacts on vegetation, terrestrial wildlife, and monarch butterfly. No significant impacts.	Short-term, negligible impacts on Atlantic and shortnose sturgeon, northern long-eared bat, tri-colored bat, little brown bat, peregrine falcon, and eastern black rail; these resources would be only temporarily or indirectly affected, if at all, during construction activities. Short- term, minor impacts on SAV, alewife, blueback herring, red hake, red-bellied cooter, and spotted turtle. Long-term, negligible impacts on bald eagle and terrestrial wildlife; these resources could occur within the project area and be affected by construction but affected habitat and duration would be minimal. Long-term minor impacts on vegetation, aquatic habitats, and monarch butterfly.
Infrastructure	Ongoing minimal maintenance could result in bridge closure and loss of utility services. Major impacts are possible.	Long-term beneficial effects from a safer, more reliable bridge. No significant impacts.	Possible relocation of communications panels or lines. Long-term beneficial effects from a safer, more reliable bridge. No significant impacts.	No significant impacts. Possible relocation of communications panels or lines. Improvements over No Action for long-term safety and reliability, but less beneficial than Alternatives 1 or 2. No significant impacts.

Resource Area	No Action Alternative	Alternative 1: Existing Bridge Alignment (Preferred Alternative)	Alternative 2: Southern Bridge Alignment	Alternative 3: Parallel Bridge Alignment
Hazardous Materials and Wastes	Continued operation with existing management plans and policies that govern hazardous materials and wastes. No significant impact.	Short-term impacts associated with increased use of hazardous materials and generation of hazardous wastes. Demolished bridge components may contain special hazards; wastes would be characterized and disposed of appropriately. Short-term potential to encounter hazards associated with the active range and contamination from IR Site 001; surveys and clearing/remediation prior to beginning construction activities would occur. Short- term potential to encounter subsurface radionuclides of concern within IR Site 061B; proper health and safety procedures would be implemented for workers. No significant impacts.	Similar to but greater than Alternative 1 because of the larger project site, which increases use of hazardous materials and generation of hazardous waste, and the potential to encounter munitions-related hazards and contamination and potential radionuclides. No significant impacts.	Similar to but slightly less that Alternative 2 because the bridge would not be demolished, which decreases potential for hazardous waste or special hazards. No significant impacts.

Key: IR = Installation Restoration; PA = Programmatic Agreement; SAV = submerged aquatic vegetation; SHPO = State Historic Preservation Officer; SOP = Standard Operating Procedure.

# 4 Cumulative Impacts

This section (1) defines cumulative impacts; (2) describes past, present, and reasonably foreseeable future actions relevant to cumulative impacts; (3) analyzes the incremental interaction the proposed action may have with other actions; and (4) evaluates cumulative impacts potentially resulting from these interactions.

# 4.1 Definition of Cumulative Impacts

The approach taken in the analysis of cumulative impacts follows the objectives of NEPA, CEQ regulations, CEQ guidance, and Navy regulations. A cumulative impact is defined in 40 CFR section 1508.7 as "the impact on the environment which results from the incremental impact of the action when added to the other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time."

To determine the scope of environmental impact analyses, agencies shall consider cumulative actions, which, when viewed with other proposed actions, have cumulatively significant impacts and should therefore be discussed in the same impact analysis document.

In addition, CEQ and USEPA have published guidance addressing implementation of cumulative impact analyses—*Guidance on the Consideration of Past Actions in Cumulative Effects Analysis* (CEQ, 2005) and *Consideration of Cumulative Impacts in EPA Review of NEPA Documents* (USEPA, 1999). CEQ guidance entitled *Considering Cumulative Impacts Under NEPA* (1997) states that cumulative impact analyses should

"... determine the magnitude and significance of the environmental consequences of the proposed action in the context of the cumulative impacts of other past, present, and future actions ... identify significant cumulative impacts ... [and] ... focus on truly meaningful impacts."

Cumulative impacts are most likely to arise when a relationship or synergism exists between a proposed action and other actions expected to occur in a similar location or during a similar time period. Actions overlapping with or near a proposed action would be expected to have more potential for a relationship than those more geographically separated. Similarly, relatively concurrent actions would tend to offer a higher potential for cumulative impacts. To identify cumulative impacts, the analysis needs to address the following three fundamental questions.

- Does a relationship exist such that affected resource areas of the Proposed Action might interact with the affected resource areas of past, present, or reasonably foreseeable actions?
- If one or more of the affected resource areas of the Proposed Action and another action could be expected to interact, would the Proposed Action affect, or be affected by, impacts of the other action?
- If such a relationship exists, then does an assessment reveal any potentially significant impacts not identified when the Proposed Action is considered alone?

## 4.2 Scope of Cumulative Impacts Analysis

The scope of the cumulative impacts analysis involves both the geographic extent of the effects and the time frame in which the effects could be expected to occur. For this EA, the study area delimits the geographic extent of the cumulative impacts analysis. In general, the study area will include those areas previously identified in Chapter 3 for the respective resource areas. The time frame for cumulative impacts centers on the timing of the Proposed Action.

Another factor influencing the scope of cumulative impacts analysis involves identifying other actions to consider. Beyond determining that the geographic scope and time frame for the actions interrelate to the Proposed Action, the analysis employs the measure of "reasonably foreseeable" to include or exclude other actions. For the purposes of this analysis, public documents prepared by federal, state, and local government agencies form the primary sources of information regarding reasonably foreseeable actions. Documents used to identify other actions include management plans, land use plans, and other planning related studies.

## 4.3 Past, Present, and Reasonably Foreseeable Actions

This section will focus on past, present, and reasonably foreseeable future projects at, and near, the Proposed Action locale. In determining which projects to include in the cumulative impacts analysis, a preliminary determination was made regarding past, present, or reasonably foreseeable actions. Specifically, using the first fundamental question included in Section 4.1, it was determined if a relationship exists such that the affected resource areas of the Proposed Action (included in this EA) might interact with the affected resource area of a past, present, or reasonably foreseeable action. If no such potential relationship exists, the project was not carried forward into the cumulative impacts analysis. In accordance with CEQ guidance (CEQ, 2005), these actions that were considered but excluded from further cumulative effects analysis are not catalogued here as the intent is to focus the analysis on the meaningful actions relevant to informed decision making. Projects included in this cumulative impacts analysis are listed in Table 4-1 and briefly described in the following subsections.

Action	Level of NEPA Analysis Completed				
Past Actions					
Closure of the NSF Dahlgren Runway	N/A				
Present and Reasonably Foreseeable Future Actions					
NSF Dahlgren Marple-Bronson Campus	Categorical Exclusion				
NSF Dahlgren RDT&E Facility (P-327)	Categorical Exclusion				
Navy Gateway Inns & Suites	Categorical Exclusion				
NSF Dahlgren Integrated Air and Missile Defense Center	EA underway				
Harry W. Nice Memorial Bridge replacement, Maryland	EA completed in July 2009; Section 4(f) evaluation				
Transportation Authority	approved in November 2012; and FONSI issued				
	October 2012				
Underground Utility Lines at Gambo Creek Bridge	Categorical Exclusion anticipated				
Long-Term Future Actions					
King George County Mixed-Use Development	N/A				

Sources: Maryland Transporation Authority, 2016; Dyson, 2018.

Key: EA = Environmental Assessment; FONSI = Finding of No Significant Impact; N/A = Not applicable;

NEPA = National Environmental Policy Act; NSF = Naval Support Facility; RDT&E = Research, Development, Testing, and Evaluation.

#### 4.3.1 Past Actions

*Closure of the NSF Dahlgren Runway:* The NSF Dahlgren runway is approximately a half-mile from the Gambo Creek alternative sites. This runway closed in 2018. The former airfield is expected to be developed in the future, but plans have not yet been developed.

## 4.3.2 Present and Reasonably Foreseeable Actions

*Marple-Bronson Campus*: The Marple-Bronson Campus Development Area is a 23-acre area on NSF Dahlgren bounded by Marple Road on the east and Bronson Road on the west. It is approximately one mile from the Gambo Creek alternative sites. The campus development is planned over five years, beginning in fiscal year 2017. Potential future development would likely consolidate tenants by department into one building or buildings closer in proximity (NAVFAC, 2016). The following projects at the Marple-Bronson Campus are either present or proposed:

- Completion of MILCON P-287 and Demolition of Building 1200 (completed fiscal year 2019). This new 57,646-square-foot facility would be constructed as an addition to Building 1560, north of the Marple-Bronson Campus Development Area, to replace Building 1200. This project would also renovate a portion of Building 1560 and add associated parking.
- Construction of a 10,000-square-foot minor construction project and associated parking (anticipated completion fiscal year 2020). This project would construct a one-story building and associated parking spaces to support accelerated mission growth for the Naval Surface Warfare Center Dahlgren Division.
- Addition of a temporary trailer complex across Marple Road from Building 185 (completed fiscal year 2018)
- Four potential small-scale construction projects, which will likely be 10,000-square-foot facilities with associated parking.

**Research, Development, Testing, and Evaluation Facility (P-327):** This unprogrammed military construction (MILCON) could occur within the next five years on the site of the former Building 1200, which has been demolished. This project is approximately one mile from the Gambo Creek alternative sites. Under MILCON P-327, a new standalone facility would be constructed to enhance RDT&E capabilities on NSF Dahlgren. It would replace temporary and deteriorating facilities and consolidate approximately 500 personnel and equipment that support the Weapons Systems Integration mission. Personnel are currently dispersed among three trailers and two buildings. MILCON P-327 would involve the demolition of 96,550 square feet of temporary trailers and technical support spaces, and the construction of a classified four-story 110,000-square foot facility. Vacated buildings would be converted to other uses.

*Navy Gateway Inns & Suites:* A three-story military lodging facility is planned to provide temporary lodging for transient officers, enlisted, authorized civilian guests, and distinguished visitors. The building will be located off Jenkins Road and replace the existing Navy Gateway Inns and Suites that is located off Dahlgren Road about a quarter-mile southeast of the new location, which is approximately one mile from the Gambo Creek alternative sites. The new Navy Gateway Inns & Suites is needed to meet lodging demands on the installation (NAVFAC Washington, 2016b).

**NSF Dahlgren Integrated Air and Missile Defense Center:** The Navy proposes to construct a low-rise Integrated Air and Missile Defense Center to accommodate the missions of the Naval Surface and Mine Warfighting Development Center Detachment Dahlgren, including the missions of the Integrated Air and

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Missile Defense/Ballistic Missile Defense and Warfare Tactical Instructor. The Navy is considering three alternative locations for this facility. An EA is still in the early stages of preparation, so the timeline and specific location for this project are not certain.

*Harry W. Nice Memorial Bridge Replacement:* The Maryland Transportation Authority has been planning for the replacement of the Harry W. Nice Memorial Bridge (Nice Bridge) that spans the Potomac River between Charles County, Maryland, and King George, Virginia. The bridge is located near NSF Dahlgren, approximately two miles from the Gambo Creek alternative sites. The existing two-lane bridge will be replaced by a four-lane bridge to lessen existing impacts from daily traffic congestion. Construction is expected to begin in early 2020, with the opening of the new bridge projected for 2023. The new bridge is planned north of and parallel to the existing bridge, and the existing bridge will be demolished after the new bridge is completed. Minimal traffic impacts are expected during construction as the existing bridge would be open during the construction of the new bridge. Construction equipment and changes to the approach would occur during off-peak and nighttime hours to reduce impacts on traffic (Maryland Transportation Authority, 2016).

**Underground Utility Lines at Gambo Creek Bridge:** New utility lines will be installed underground across Gambo Creek. Some utility trenching will likely be required on land, but underground utilities will be bored well below the existing creek bed using a technique such as horizontal directional drilling to install the utilities and avoid dredging or using cofferdams during construction.

## 4.3.3 Long-Term Future Actions

*King George County Mixed-Use Development*: The King George County Board of Supervisors have approved a plan for mixed-use development along State Route 3 in the area of the King George Courthouse, down Route 3 until it intersects with U.S. Route 301, and along that highway until it meets State Route 206. This development would occur in the vicinity of NSF Dahlgren, near the U.S. Route 301/State Route 206 junction, which is approximately three miles from the Gambo Creek alternative sites. The approved mixed-use development ordinance would allow up to 18 dwelling units per acre, sidewalks on both sides of the street, and underground utilities (Dyson, 2018).

# 4.4 Cumulative Impact Analysis

Where feasible, the cumulative impacts were assessed using quantifiable data; however, for many of the resources included for analysis, quantifiable data are not available, and a qualitative analysis was undertaken. In addition, where an analysis of potential environmental effects for future actions has not been completed, assumptions were made regarding cumulative impacts related to this EA where possible. The analytical methodology presented in Chapter 3, which was used to determine potential impacts on the various resources analyzed in this document, was also used to determine cumulative impacts.

## 4.4.1 Air Quality

# 4.4.1.1 Description of Geographic Study Area

The study area for cumulative impacts on air quality is King George County, within the Northeastern Virginia Intrastate Air Quality Control Region.

## 4.4.1.2 Relevant Past, Present, and Future Actions

All present and reasonably foreseeable future actions listed in Table 4-1 and the Proposed Action have the potential to affect air quality.

## 4.4.1.3 Cumulative Impact Analysis

For present and future projects, any construction would generate short-term criteria pollutant and fugitive dust emissions while ground-disturbing activities are occurring. Air emissions are based on the size and complexity of the project and whether construction activities would occur on unpaved surfaces. All present and reasonably foreseeable future actions could collectively increase emissions of criteria air pollutants temporarily in and around the project sites at NSF Dahlgren, but variations in the timing of the present and future projects, and the relatively short durations of project-related effects, would distribute air quality impacts temporally and geographically. The Proposed Action would only have short-term construction-related contributions to air emissions. Projects identified in Table 4-1 could also have negligible-to-minor increases as well from the installation and operation of boilers or back-up generators, but long-term emissions increases would be cumulatively minor.

Cumulatively, emissions from all projects are negligible or minor and would occur within an attainment area. Furthermore, construction emissions would be temporary. Therefore, implementation of the Proposed Action, combined with the past, present, and reasonably foreseeable future projects, would not result in significant impacts within the study area.

## 4.4.2 Water Resources

## 4.4.2.1 Description of Geographic Study Area

The study area for assessment of cumulative impacts on water resources is NSF Dahlgren and adjacent areas that could be indirectly affected.

# 4.4.2.2 Relevant Past, Present, and Future Actions

All projects listed in Table 4-1 and the Proposed Action have the potential to affect water resources.

## 4.4.2.3 Cumulative Impact Analysis

For present and future projects, any construction has the potential to affect surface water, groundwater, and stormwater runoff while ground-disturbing activities are occurring. The Proposed Action could affect the inflow of surface water and sediments in Gambo Creek and potentially change local drainage patterns. However, impacts associated with erosion and sedimentation into water bodies would be limited by the implementation of appropriate BMPs to minimize soil and contaminated water from leaving construction sites.

For the underground utility line construction at Gambo Creek, entry points for horizontal directional drilling will be located outside of the wetland areas, and then drilling will occur well below the wetlands and creek bed. A Permit Application under Nationwide Permit 12 for Utility Line Activities will be required for the horizontal directional drilling for the underground placement of utilities. In the long term, utility repairs, if needed, would typically be addressed using a guided drill head at the same entry points used for installing the utility piping. If such extensive repairs required trenching within the wetland or creek bed, the Navy would adhere to all necessary permits and regulations.

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In the long term, projects that would increase impervious surfaces could also cumulatively reduce groundwater infiltration, increase stormwater runoff, and decrease stormwater quality. Present and foreseeable future projects involving new structures must adhere to federal and state requirements of ensuring the post-development hydrology is the same as predevelopment hydrology and treating 100 percent of the stormwater from new development.

Cumulatively, impacts on water resources would be negligible or minor and localized to individual project sites. In addition, projects on the installation would implement construction BMPs, follow stormwater management principles in the installation's stormwater pollution prevention plan, and preserve hydrology after development. Therefore, implementation of the Proposed Action, combined with past, present, and reasonably foreseeable future projects, would not result in significant impacts within the study area.

#### 4.4.3 Geological Resources

#### 4.4.3.1 Description of Geographic Study Area

The study area for assessment of cumulative impacts on geological resources is NSF Dahlgren.

#### 4.4.3.2 Relevant Past, Present, and Future Actions

Present and foreseeable future actions described in Table 4-1 are considered in this cumulative impact analysis on geological resources for the Proposed Action.

#### 4.4.3.3 Cumulative Impact Analysis

Cumulative impacts on geological resources from past, present, and future actions within the study area would be less than significant because impacts are location-specific.

For the underground utility line construction at Gambo Creek, horizontal directional drilling will require some trenching and will lead to short-term disturbance of the soil, although soil disturbance will be limited to areas outside the creek bed. This will result in ground disturbance and require permits including Virginia NPDES; however, these impacts would be short term.

The present and foreseeable actions described in Table 4-1 may have impacts on soil and topography, but those would be bound by the site location. Furthermore, impacts from soil erosion would be limited by implementation of BMPs. The projects listed in Table 4-1 are not located in the immediate area of the alternative sites. Therefore, implementation of the Proposed Action, combined with the past, present, and reasonably foreseeable future projects, would not result in significant impacts on the geological resources within the study area.

#### 4.4.4 Cultural Resources

## 4.4.4.1 Description of Geographic Study Area

The study area for assessment of cumulative impacts on cultural resources is NSF Dahlgren.

### 4.4.4.2 Relevant Past, Present, and Future Actions

All past, present, and reasonably foreseeable future actions occurring at NSF Dahlgren listed in Table 4-1 have the potential to affect cultural resources within the study area. All individual projects that involve ground-disturbing activities or any changes within NRHP-eligible historic properties or districts, or within their viewshed, may directly or indirectly affect cultural resources.

## 4.4.4.3 Cumulative Impact Analysis

The Navy meets its stewardship requirements toward cultural resources under NHPA Sections 106 and 110. The installation has an Integrated Cultural Resources Management Plan that is a reference and planning tool for managing and preserving cultural resources while maintaining mission readiness (Navy, 2014). Any building demolition or construction of buildings within NRHP-eligible historic districts or their viewsheds would be mitigated in accordance with Section 106 of the NHPA. Any building renovations would be done in accordance with the Secretary of the Interior's Standards of Rehabilitation (36 CFR part 68). Any ground-disturbing activities in undeveloped areas would undergo surveys for archaeological artifacts, and/or project boundaries would be compared against known areas of archaeological sensitivity. Consultation with the SHPO (and other appropriate parties, such as the Pamunkey Indian Tribe in the case of this Proposed Action) is undertaken prior to project commencement. In this way, the Navy works to identify, avoid, minimize, and/or mitigate any potential impacts on cultural resources when implementing individual projects.

The underground utility line construction at Gambo Creek will avoid known existing archaeological sites. However, because survey of the area under the creek is not possible using traditional survey methods, there is the potential to encounter unanticipated discoveries. In the event of an unanticipated discovery, the Navy would follow specific procedures detailed in SOP 5, *Response to Unexpected Archaeological Discoveries*, in NSF Dahlgren's ICRMP.

Other present and future projects from Table 4-1 would be within the viewshed of the Dahlgren Mainside Historic District and/or Residential Historic District, including the runway, the Marple-Bronson Campus, the Integrated Air and Missile Defense Center, and MILCON P-327. Individually, each project must undergo review and consultation. Cumulatively, impacts on cultural resources would not likely affect the status of contributing resources to the NRHP-eligible resources, namely the historic districts. Therefore, implementation of the Proposed Action, combined with the past, present, and reasonably foreseeable future projects, would not result in significant impacts on cultural resources within the study area.

## 4.4.5 Biological Resources

## 4.4.5.1 Description of Geographic Study Area

The study area for assessment of cumulative impacts on biological resources is NSF Dahlgren and the surrounding biological community.

## 4.4.5.2 Relevant Past, Present, and Future Actions

All projects listed in Table 4-1 could contribute directly or indirectly to impacts on biological resources.

### 4.4.5.3 Cumulative Impact Analysis

For past, present, and future projects at NSF Dahlgren, construction projects would be expected to generate some noise and fugitive dust, which could directly or indirectly affect wildlife species. Individually, projects would be expected to have negligible to minor impacts, dependent on the biological community where the construction occurs, and would vary with the size, intensity, and duration of construction activities. Given the ample habitat on NSF Dahlgren, wildlife would be able to retreat if disturbed by noise, dust, or increased human activities.

For the underground utility line construction at Gambo Creek, horizontal directional drilling will have short-term, minor impacts on biological resources if extensive utility repairs are required in the future. If repairs were needed that required trenching within the wetland or creek bed, the Navy would adhere to all necessary permits and regulations.

Projects that could have cumulative impacts in combination with the Proposed Action would result in increased sedimentation and turbidity in downstream surface waters. However, the projects listed in Table 4-1 are not in close proximity to Gambo Creek Bridge and would not have direct increases in sedimentation and turbidity in Gambo Creek. In addition, construction projects would adhere to federal and state regulations and permits and would implement erosion- and sediment-control measures and stormwater management facilities, as required.

Cumulative projects that would develop currently undisturbed land would contribute to the cumulative loss of vegetation and wildlife habitat. However, most of the projects outlined in Table 4-1 are within the existing operational and support areas of NSF Dahlgren, much of which is either developed or maintained open space. These areas would be considered poor habitat and would have less cumulative contributions. Implementation of the Proposed Action, combined with the past, present, and reasonably foreseeable future projects, would not result in significant impacts within the study area.

#### 4.4.6 Infrastructure

## 4.4.6.1 Description of Geographic Study Area

The study area for assessment of cumulative impacts on infrastructure is NSF Dahlgren.

## 4.4.6.2 Relevant Past, Present, and Future Actions

All past, present, and reasonably foreseeable future actions listed in Table 4-1 and the Proposed Action have the potential to affect infrastructure.

## 4.4.6.3 Cumulative Impact Analysis

Individual construction activities have varying infrastructure requirements. Utility system capacities on NSF Dahlgren are adequate. Individual projects could have temporary impacts during construction activities while systems are being interconnected, but these kinds of disruptions would be minor and short term in nature. Cumulatively, construction projects are expected to improve overall system reliability.

For the underground utility line construction at Gambo Creek, short-term service disruptions will be expected immediately before the connection to the new utilities. These service disruptions will be coordinated with the affected installation facilities and will likely occur during a weekend, minimizing their operational impacts. The electrical power crossing Gambo Creek only serves Terminal Range, and range operations do not occur on weekends (Sowell, 2019). Because the watermain and various

communications lines are part of a looped system, there will be no short-term disruption to these utility services.

The Proposed Action would not increase demand for or change the capacity of the existing utility infrastructure, and therefore would not contribute cumulatively to impacts in these areas. Therefore, implementation of the Proposed Action, combined with the past, present, and reasonably foreseeable future projects, would not result in significant impacts in the study area.

#### 4.4.7 Hazardous Materials and Wastes

## 4.4.7.1 Description of Geographic Study Area

The study area for the assessment of cumulative impacts on hazardous materials and wastes is NSF Dahlgren.

#### 4.4.7.2 Relevant Past, Present, and Future Actions

All past, present, and reasonably foreseeable future actions listed in Table 4-1 have the potential to affect hazardous materials and wastes.

#### 4.4.7.3 Cumulative Impact Analysis

Cumulative impacts associated with hazardous materials and wastes from past, present, and future actions within the study area would be less than significant. Construction and demolition activities would be expected to use small quantities of hazardous materials and generate small quantities of hazardous wastes while these activities are occurring. Activities would adhere to existing hazardous materials, waste, and spill management plans. The Navy continually monitors its operations to find ways to minimize the use of hazardous materials and to reduce the generation of hazardous wastes. Therefore, implementation of the Proposed Action, combined with the past, present, and reasonably foreseeable future projects, would not result in significant impacts on hazardous materials and wastes within the study area.

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# 5 Other Considerations Required by the National Environmental Policy Act

## 5.1 Irreversible or Irretrievable Commitments of Resources

Resources that are irreversibly or irretrievably committed to a project are those that are used on a longterm or permanent basis. This includes the use of non-renewable resources, such as metal and fuel, and natural or cultural resources. These resources are irretrievable in that they would be used for this project when they could have been used for other purposes. Human labor is also considered an irretrievable resource. Another impact that falls under this category is the unavoidable destruction of natural resources that could limit the range of potential uses of that particular environment.

Implementation of the Proposed Action would involve human labor; the consumption of fuel, oil, and lubricants for construction equipment and vehicles; and the potential to lose cultural resources including the bridge (a contributing resource to Dahlgren Mainside Historic District) and portions of Site 44KG0157 (NRHP-eligible). No long-term changes in operations would occur. The loss of natural resources would include up to 3,340 square feet of trees under Alternative 1; 10,790 square feet of trees under Alternative 2; or 8,290 square feet under Alternative 3. These resources are not rare or scarce on NSF Dahlgren; therefore, their use for the Proposed Action would not result in significant irreversible or irretrievable commitment of resources. In addition, there would be short-term loses of jurisdictional wetlands to include up to 63,860 square feet under Alternative 1; 75,520 square feet under Alternative 2; or 70,190 square feet under Alternative 3. Bridge designs have not been finalized, but any direct, long-term impacts (i.e., discharge of fill material) within the jurisdictional wetland would be permitted and mitigated in accordance with Section 404 of the Clean Water Act, to reduce impacts to less than significant.

# 5.2 Unavoidable Adverse Impacts

Implementing the Proposed Action would result in the following unavoidable environmental impacts. For all three alternative sites, there would be short-term, minor, adverse impacts on air quality, water resources, geological resources, biological resources, infrastructure and hazardous materials and wastes. There would also be long-term, minor, adverse impacts on water resources, cultural resources, biological resources, loss of trees, loss of wetlands, and an increase in impervious surfaces. The Proposed Action would have long-term, beneficial effects from upgrading and improving utilities on NSF Dahlgren.

Due to its location, the Proposed Action would have unavoidable impacts on wetlands and floodplains. The Navy would mitigate any impacts on jurisdictional wetlands in accordance with all permits and regulations. The Navy would restore and preserve the existing floodplain to the extent practicable to reduce flood risk. Avoiding archaeological site 44KG0157 is also not possible under Alternatives 2 and 3 and may not be possible under Alternative 1. The Navy would enter into a PA concerning potential impacts on this site under any of the alternatives. The PA would stipulate bridge design submissions to the SHPO as well as a Phase III data recovery plan with the intent of avoiding or minimizing impacts on Site 44KG0157.

## 5.3 Relationship between Short-Term Use of the Environment and Long-Term Productivity

NEPA requires an analysis of the relationship between a project's short-term impacts on the environment and the effects that these impacts may have on the maintenance and enhancement of the long-term productivity of the affected environment. Impacts that narrow the range of beneficial uses of the environment are of particular concern. This refers to the possibility that choosing one development site reduces future flexibility in pursuing other options, or that using a parcel of land or other resources often eliminates the possibility of other uses at that site.

In the short term, effects on the human environment with implementation of the Proposed Action would primarily relate to the construction activity itself. Air quality, and water, geological, and biological resources would be affected in the short-term during construction. In the long term, there would be a loss of trees, loss of vegetation, loss of wetlands, and an increase in impervious surface under any of the action alternatives. However, the loss of trees would be a fraction of the total existing forested areas on NSF Dahlgren. The construction and operation of proposed bridge would not significantly impact the long-term natural resource productivity of the area. The Proposed Action would not result in any impacts that would significantly reduce environmental productivity or permanently narrow the range of beneficial uses of the environment.

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