



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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April 16, 2014

Ms. Elizabeth Nashold
Environmental Program Manager
Department of the Navy
Navy Region Mid-Atlantic
1510 Gilbert Street
Norfolk, Virginia 23511-2737

RE: Federal Consistency Determination for the Construction and Operation of a Small Arms Range Facility at Naval Weapons Station Yorktown, York and James City Counties, DEQ 14-025F.

Dear Ms. Nashold:

The Commonwealth of Virginia has completed its review of the Federal Consistency Determination (FCD) for the above-referenced project. The Department of Environmental Quality (DEQ) is responsible for coordinating Virginia's review of Federal Consistency Determinations and responding to appropriate officials on behalf of the Commonwealth. This letter is in response to your submission dated February 11, 2014 (received on February 14, 2014) requesting concurrence with the Federal Consistency Determination prepared by the Department of the Navy. The following agencies, localities, and planning district commission participated in this review:

Department of Environmental Quality
Department of Game and Inland Fisheries
Department of Conservation and Recreation
Virginia Marine Resources Commission
Department of Forestry
Department of Health
Department of Historic Resources
York County
James City County
Hampton Roads Planning District Commission

In addition, the Department of Agriculture and Consumer Services was invited to comment on the proposal.

PROJECT DESCRIPTION

The Department of the Navy (Navy or applicant) proposes to expand and modernize an existing small arms range facility at Naval Weapons Station (NWS) Yorktown located in York County and James City County. The proposed expansion would include the construction and operation of one 27-lane rifle range with a target distance of approximately 500 yards and one 27-lane pistol range with a target distance of approximately 50 yards. Associated range amenities would include ordnance storage magazines, an operations building for range administration and instruction, an armory for weapons storage, designated areas for weapons maintenance, covered areas for on-site instruction, and a shop for target storage and assembly. In addition, the project would include surface preparation or grading and the widening, re-surfacing, and re-routing of select roadways on NWS Yorktown. Other infrastructure associated with the proposed action would include vehicle control gates to limit access to the range safety danger zones (SDZs) during operations; electrical systems such as distribution lines, lighting, and telecommunications; and mechanical systems such as heating, ventilation and air conditioning (HVAC), potable water, sanitary sewer, and fire protection and supply systems. The total area necessary to implement the proposed action is approximately 31 acres, which includes the proposed range footprints (approximately 26 acres) and areas adjacent to existing roadways at NWS Yorktown where proposed transportation and utility upgrades would occur (approximately 5 acres).

PUBLIC PARTICIPATION

In accordance with 15 CFR §930.2, the public was invited to participate in the review of the FCD. Public notice of this proposed action was published on the DEQ website from February 21, 2014 through March 18, 2014. At the end of the public comment period DEQ had received six written comments (attached) representing eight individuals. One individual expressed support for the proposal and seven individuals expressed opposition.

Overall, the primary concern is with noise from existing range activities (high decibel levels and no day or time restrictions) and the anticipated increase in the volume and duration of noise from an expanded facility. Specific noise related effects identified include its adverse impact on wildlife, negative impact on property values (Kings Mill), and adverse impact on tourism (Water Country, Bush Gardens, Colonial Parkway, Historic Yorktown, Historic Williamsburg, and the Kings Mill golf course). In addition, one respondent noted that existing range activities have resulted in the closure of the York River shipping channel affecting watermen and barge traffic to the West Point paper mill which adversely impacts commerce.

Public concern over adverse wildlife impacts were forwarded to the Department of Game and Inland Fisheries (DGIF) for review and comment. DGIF responded (attached) that it works closely with military installations on the development of Integrated Natural Resources Management Plans (INRMPs) which address the management and protection of the natural resources at military facilities, including

wildlife and their habitats. Considered in these plans are any future expansions and the designation of wildlife habitats for protection. DGIF's comments on the proposed range expansion included recommendations for additional coordination to fully evaluate impacts upon identified species of concern. Furthermore, DGIF identified the following actions the Navy can take to further avoid and/or minimize impacts upon wildlife and their habitats. DGIF's recommendations are:

- Coordinate with DGIF if habitat for the Mabee's salamander will be impacted, so that DGIF may provide specific recommendations for the protection of this species.
- Coordinate with the U.S. Fish and Wildlife Service regarding possible impacts upon bald eagles.
- Avoid and minimize impacts to undisturbed forest, wetlands, and streams to the fullest extent practicable.
- Maintain undisturbed naturally vegetated buffers of at least 100 feet in width around all on-site wetlands and on both sides of all perennial and intermittent streams.
- Adhere to a time-of-year restriction protective of resident and migratory songbird nesting from March 15 through August 15 of any year for all tree removal and ground clearing.
- Adhere to erosion and sediment controls during ground disturbance.
 - Design stormwater controls to replicate and maintain the hydrographic condition of the site prior to the change in landscape. This should include, but not be limited to,
 - utilizing bioretention areas, and
 - minimizing the use of curb and gutter in favor of grassed swales.

DGIF will continue to work with the installation on updates to the INRMP. During these updates, DGIF will have the opportunity to evaluate how any recent expansions in activities and land changes on site may have impacted or may impact wildlife and their habitats. DGIF will work with the Navy to mitigate or compensate for adverse impacts as appropriate. Accordingly, DGIF believes it has fully considered impacts upon wildlife resources under its jurisdiction related to the proposed expansion of the range.

The majority of public concerns are of a socio-economic nature which is outside the scope and authority of the Commonwealth's federal consistency review process under the *Coastal Zone Management Act* and *Federal Consistency Regulations*. Accordingly, none of the identified concerns adversely impact any of the nine enforceable policies of the federally approved Virginia Coastal Zone Management Program, which would be required as a basis for the Commonwealth to object to the Navy's consistency determination.

FEDERAL CONSISTENCY UNDER THE COASTAL ZONE MANAGEMENT ACT

Pursuant to the Coastal Zone Management Act of 1972 (§ 1456(c)), as amended, and the federal consistency regulations implementing the CZMA (15 CFR Part 930, Subpart

C, § 930.30 *et seq.*) federal actions that can have reasonably foreseeable effects on Virginia's coastal uses or resources must be conducted in a manner which is consistent, to the maximum extent practicable, with the Virginia Coastal Zone Management Program (VCP). The VCP is comprised of a network of programs administered by several agencies. In order to be consistent with the VCP, the federal agency activities must be consistent with all the applicable enforceable policies of the VCP prior to commencing the project.

FEDERAL CONSISTENCY CONCURRENCE

Based on our review of the Navy's consistency determination, additional information on project impacts to areas analogous to Chesapeake Bay Preservation Areas provided by the Navy on April 8, 2014 (attached), and the comments submitted by agencies administering the enforceable policies of the VCP, DEQ concurs that the proposal is consistent with the VCP provided all applicable permits and approvals are obtained as described below. However, other state approvals which may apply to this project are not included in this consistency concurrence. Therefore, the Navy must ensure that this project is constructed and operated in accordance with all applicable federal, state, and local laws and regulations.

FEDERAL CONSISTENCY ANALYSIS

According to information in the FCD, the proposed activity would have no effect on the following enforceable policies: fisheries management; subaqueous lands management; and dunes management. The resource agencies that are responsible for the administration of the enforceable policies of the VCP generally agree with the Navy's determination. The Navy must ensure that the proposed action is consistent with the aforementioned policies. The analysis which follows responds to the Navy's discussion of the enforceable policies of the VCP that apply to this project and review comments submitted by agencies that administer the enforceable policies.

1. Fisheries Management. According to the FCD (page 3), surface water levels in the vicinity of the project site are intermittent and do not support viable finfish or shellfish for commercial or recreational purposes. Therefore, the proposed action would not affect commercial or recreational fishery resources.

1(a) Agency Jurisdiction. The Department of Game and Inland Fisheries (DGIF) (Virginia Code §29.1-100 to §29.1-570) and the Virginia Marine Resources Commission (VMRC) (Virginia Code §28.2-200 to §28.2-713) administer the fisheries management enforceable policy of the VCP. In addition, the Virginia Department of Health (VDH) Division of Shellfish Sanitation (DSS) is responsible for protecting the health of the consumers of molluscan shellfish and crustacea by ensuring that shellfish growing waters are properly classified for harvesting, and that molluscan shellfish and crustacea processing facilities meet sanitation standards.

1(b) Agency Findings.

(i) Virginia Department of Game and Inland Fisheries

DGIF documents the James River and King Creek Anadromous Fish Use Areas from the project area. However, based on the scope and location of the proposed work, DGIF does not anticipate it to result in adverse impacts upon these resources.

(ii) Virginia Marine Resources Commission

VMRC finds that it does not appear that any work is proposed within the agency's jurisdiction.

(iii) Department of Health

VDH-DSS did not indicate that shellfish resources under its jurisdiction would be impacted.

1(c) Conclusion. The proposal is consistent with the fisheries management enforceable policy of the VCP.

For additional information, contact DGIF, Amy Ewing at (804) 367-2211; VMRC, Randy Owen at (757) 247-2251; or VDH-DSS, Keith Skiles at (804) 864-7487.

2. Subaqueous Lands Management. The FCD (page 4) states that the operation of the proposed action would generate surface danger zones (SDZs) that extend from the base of the rifle and pistol range, respectively. The SDZs would be regulated for access control to ensure safe range operations and would not encroach upon the subaqueous lands of the York River. The document concludes that the proposed action would not affect the subaqueous lands of the Commonwealth of Virginia.

2(a) Agency Jurisdiction. Pursuant to Section 28.2-1204 of the Code of Virginia the Virginia Marine Resources Commission has jurisdiction over any encroachments in, on, or over any state-owned rivers, streams, or creeks in the Commonwealth. Accordingly, any portion of the project involving encroachments channelward of mean low water below the fall line may require a permit.

VMRC serves as the clearinghouse for the JPA used by:

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

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2(b) Agency Findings. VMRC finds that it does not appear that any work is proposed within the agency's jurisdiction.

2(c) Conclusion. The proposed action is consistent with the subaqueous lands management enforceable policy of the VCP.

For additional information, contact VMRC, Randy Owen at (757) 247-2251.

3. Wetlands Management. According to the FCD (page 4), the Navy completed a wetland delineation in the area in and around the existing small arms range which was confirmed by the Corps. Construction would directly impact approximately 2.4 acres of non-tidal wetlands, of which 1.3 acres are associated with the proposed construction of the range facilities and 1.1 acres with the proposed roadway and utility system upgrades. The document states that, prior to construction of the proposed action, the Navy would obtain a Clean Water Act (CWA) Section 404 permit from the Corps and CWA Section 401 certification from DEQ.

3(a) Agency Jurisdiction. The wetlands management enforceable policy is administered by the Virginia Marine Resources Commission for tidal wetlands (Virginia Code 28.2-1301 through 28.2-1320) and the Department of Environmental Quality through the Virginia Water Protection Permit program for tidal and non-tidal wetlands (Virginia Code §62.1-44.15:5 and Water Quality Certification pursuant to Section 401 of the Clean Water Act).

3(b) Agency Findings.

(i) Department of Environmental Quality

The Virginia Water Protection Permit Program (WPPP) program at the DEQ Tidewater Regional Office (TRO) finds that the proposed Small Arms Range Facility project involves direct impacts to wetlands confirmed by the U.S. Army Corps of Engineers and regulated by the WPPP Program.

(ii) Virginia Marine Resources Commission

As previously noted, VMRC finds that it does not appear that any work is proposed that falls within the agency's jurisdiction.

3(c) Recommendations. The project must comply with section 404 (b)(1) guidelines of the Clean Water Act and with the Commonwealth's wetlands mitigation policies. Both federal and state guidelines recommend avoidance and minimization of wetlands impacts as the first steps in the mitigation process. In general, DEQ has the following recommendations:

- Operate machinery and construction vehicles outside of stream-beds and wetlands; use synthetic mats when in-stream work is unavoidable;

- Place heavy equipment, located in temporarily impacted wetland areas, on mats, geotextile fabric, or use other suitable measures to minimize soil disturbance, to the maximum extent practicable.
- Restore all temporarily disturbed wetland areas to pre-construction conditions and plant or seed with appropriate wetlands vegetation in accordance with the cover type (emergent, scrub-shrub, or forested). The applicant should take all appropriate measures to promote re-vegetation of these areas. Stabilization and restoration efforts should occur immediately after the temporary disturbance of each wetland area instead of waiting until the entire project has been completed.
- Place all materials which are temporarily stockpiled in wetlands, designated for use for the immediate stabilization of wetlands, on mats, geotextile fabric in order to prevent entry in state waters. These materials should be managed in a manner that prevents leachates from entering state waters and must be entirely removed within thirty days following completion of that construction activity. The disturbed areas should be returned to their original contours, stabilized within thirty days following removal of the stockpile, and restored to the original vegetated state.
- Flag or mark all non-impacted surface waters within the project or right-of-way limits that are within 50 feet of any clearing, grading, or filling activities for the life of the construction activity within that area. The project proponent should notify all contractors that these marked areas are surface waters where no activities are to occur.
- Employ measures to prevent spills of fuels or lubricants into state waters.

3(d) Requirement. A Joint Permit Application must be submitted to the Virginia Marine Resources Commission for dissemination to the appropriate regulatory agencies.

3(e) Conclusion. The project will be consistent with the wetlands management enforceable policy of the VCP, provided the Navy obtains and complies with applicable permits and authorizations.

4. Nonpoint Source Pollution Control. According to the FCD (page 5), construction would be subject to the provisions of a Construction General Permit administered as part of the Virginia Stormwater Management Program and would be carried out consistent with the applicable construction site standards established by the Virginia Erosion and Sedimentation Control Program. Prior to implementation of the proposed action, the Navy would prepare a site-specific stormwater pollution prevention plan (SWPPP) and ensure compliance with its provisions during and after the construction phase.

4(a) Agency Jurisdiction. Effective July 1, 2013, the Department of Environmental Quality Office of Stormwater Management (OSWM) administers the *Virginia Erosion and Sediment Control Law and Regulations (VESCL&R)* and *Virginia Stormwater Management Law and Regulations (VSWML&R)*. In addition, DEQ-OSWM is responsible for the issuance, denial, revocation, termination and enforcement of the Virginia Stormwater Management Program (VSMP) General Permit for Stormwater

Discharges from Construction Activities related to municipal separate storm sewer systems (MS4s) and construction activities for the control of stormwater discharges from MS4s and land disturbing activities under the Virginia Stormwater Management Program. Note that these programs were previously administered by the Department of Conservation and Recreation.

4(b) Requirements.

(i) Erosion and Sediment Control and Stormwater Management Plans

According to DEQ, the Navy and its authorized agents conducting regulated land-disturbing activities on private and public lands in the state must comply with the *Virginia Erosion and Sediment Control Law and Regulations (VESCL&R)* and *Virginia Stormwater Management Law and Regulations (VSWML&R)*, including coverage under the general permit for stormwater discharge from construction activities, and other applicable federal nonpoint source pollution mandates (e.g. Clean Water Act-Section 313, federal consistency under the Coastal Zone Management Act). Clearing and grading activities, installation of staging areas, parking lots, roads, buildings, utilities, borrow areas, soil stockpiles, and related land-disturbing activities that result in the total land disturbance of equal to or greater than 2,500 square feet in areas analogous to Chesapeake Bay Preservation Area would be regulated by VESCL&R. Accordingly, the applicant must prepare and implement an erosion and sediment control (ESC) plan to ensure compliance with state law and regulations. The ESC plan is submitted to the DEQ Tidewater Regional Office that serves the area where the project is located for review for compliance. The applicant is ultimately responsible for achieving project compliance through oversight of on-site contractors, regular field inspection, prompt action against non-compliant sites, and other mechanisms consistent with agency policy. [Reference: VESCL 62.1-44.15 et seq.]

(ii) Virginia Stormwater Management Program General Permit for Stormwater Discharges from Construction Activities

The operator or owner of a construction project involving land-disturbing activities equal to 2,500 square feet or more in areas analogous to Chesapeake Bay Preservation Area is required to register for coverage under the General Permit for Discharges of Stormwater from Construction Activities and develop a project-specific stormwater pollution prevention plan (SWPPP). The SWPPP must be prepared prior to submission of the registration statement for coverage under the general permit and the SWPPP must address water quality and quantity in accordance with the *VSMPP Permit Regulations*. General information and registration forms for the General Permit are available on DEQ's website at

<http://www.deq.virginia.gov/Programs/Water/StormwaterManagement/VSMPPPermits/ConstructionGeneralPermit.aspx>. [Reference: Virginia Stormwater Management Act 62.1-44.15 et seq.] VSMPP Permit Regulations 9 VAC 25-870-10 et seq.]

4(c) Conclusion. The proposed action would be consistent with the nonpoint source pollution control enforceable policy of the VCP, provided the project complies with applicable ESC and SWM requirements.

5. Point Source Pollution Control. According to the FCD (page 6), spent military munitions and ordnance are not a hazardous waste subject to regulation under the Resources Conservation and Recovery Act (RCRA; 42 U.S.C. §§6901-6992k) when used for training purposes. However, the Navy would routinely monitor berms and other areas of the range for lead and other metal constituents typically found in spent munitions. The Navy would maintain its Virginia Pollutant Discharge Elimination System (VPDES) permit for NWS Yorktown and update its facility-wide SWPPP to address the management of stormwater runoff from the operation of the proposed action.

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

5(b) Agency Findings. The VPDES program at DEQ-TRO find that metals may leach from the spent munitions in the berm into local groundwater and surface water.

5(c) Requirements. The Navy must implement structural and housekeeping best management practices (BMPs) to prevent metals leaching to the groundwater and surface water. DEQ-VPDES will further address this issue with the reissuance of the facility's VPDES permit. This may include conditions requiring additional monitoring, additional BMP requirements, or a combination of the two.

5(c) Conclusion. The proposed action is consistent with the nonpoint source pollution control enforceable policy of the VCP, provided the project complies with the requirements of the Navy's VPDES permit.

6. Shoreline Sanitation. The FCD (page 6) states that the proposed action would use septic tanks and leach field systems for on-site wastewater disposal. The placement and operation of these systems would be driven by local soil conditions (i.e., avoidance of hydric soils) and sited with sufficient distance from surface waters.

6(a) Agency Jurisdiction. The purpose of this program is to regulate the installation of septic tanks, set standards concerning soil types suitable for septic tanks, and specify minimum distances that tanks must be placed away from streams, rivers, and other waters of the Commonwealth. This program is administered by the Department of Health Division of Onsite Sewage and Water Services (DOSWS) under Virginia Code §32.1-

164 through §32.1-165. VDH is responsible for adopting and implementing regulations for marinas, private wells, and onsite wastewater treatment and disposal.

6(b) Agency Findings. VDH-DOSWS did not indicate that it had any concerns with the proposal.

6(c) Requirement. The Navy should coordinate with VDH under Virginia Code Sections 32.1-164 A. and B through its office at the Peninsula Health District.

6(d) Conclusion. This project will be consistent with the shoreline sanitation enforceable policy of the VCP, provided the Navy coordinates with VDH-DOSWS and receives all applicable approvals prior to implementation of the project.

7. Air Pollution Control. According to the FCD (page 7), the installation maintains a state operating permit (SOP) for air emissions generated from the operation of the existing small arms range. Therefore, the Navy would apply for an amendment to its permit (# 60301) to incorporate the operation of the expanded range.

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

7(b) Agency Findings. According to the DEQ Air Division, the project site is located in the Hampton Roads ozone (O₃) maintenance area and an emission control area for the contributors to ozone pollution, which are volatile organic compounds (VOCs) and nitrogen oxides (NO_x).

7(c) Recommendations. The Navy should take all reasonable precautions to limit emissions of VOCs and NO_x, principally by controlling or limiting the burning of fossil fuels.

7(d) Requirements.

(i) Fugitive Dust

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

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

(ii) Asphalt Paving

In accordance with 9 VAC 5-40-5490, there are limitations on the use of “cut-back” (liquefied asphalt cement, blended with petroleum solvents) that may apply to paving activities associated with the project. Moreover, there are time-of-year restrictions on its use during the months of April through October in VOC emission control areas.

(iii) Open Burning

If project activities include the open burning or use of special incineration devices for the disposal of debris, this activity must meet the requirements of 9 VAC 5-130-10 through 9 VAC 5-130-60 and 9 VAC 5-130-100 of the *Regulations* for open burning, and it may require a permit. The *Regulations* provide for, but do not require, the local adoption of a model ordinance concerning open burning. The Navy should contact York County and James City County fire officials to determine what local requirements, if any, exist.

7(e) Conclusion. The project is consistent with the air pollution control enforceable policy of the VCP provided the Navy obtains and complies with all applicable approvals prior to implementation of the project.

8. Coastal Lands Management. According to the FCD (page 7), the construction of the proposed action would affect locally designated Chesapeake Bay Preservation Areas (CBPAs) in York County. The document concludes that, although such designations do not apply to federal landholdings, the Navy would, to the maximum extent practicable, implement the proposed action consistent with the applicable performance standards for Chesapeake Bay Resource Protection Areas (RPA) and Resource Management Areas (RMAs), respectively.

8(a) Agency Jurisdiction. Effective July 1, 2013, DEQ-OSWM administers the coastal lands management enforceable policy of the VCP which is governed by the Chesapeake Bay Preservation Act (Bay Act) (Virginia Code §62.1-44.15 *et seq.*) and *Chesapeake Bay Preservation Area Designation and Management Regulations (Regulations)* (9 VAC 25-830-10 *et seq.*). Note that this enforceable policy was previously administered by the Department of Conservation and Recreation.

8(b) Agency Findings. DEQ-OSWM finds that it appears that some elements of the proposed project will be located within, and may include impacts to, lands analogous to locally designated RPA and/or RMA. However, DEQ-OSWM notes that additional information from the Navy (April 8, 2014 email, attached) documents that the proposed project cannot be implemented without encroachment into lands analogous to RPAs on the proposed site, and that the project as proposed is the only viable alternative. In addition, the FCD concludes that Navy has determined that the subject proposed action has a reasonable likelihood to affect the use or natural resources of the Commonwealth of Virginia's coastal zone. However, the Navy would implement the proposed action to

be fully consistent or consistent to the maximum extent practicable with the enforceable policies of the VCP.

8(c) Requirements.

(i) Resource Protection Areas

Land disturbance and development in lands analogous to RPA is limited to water-dependent uses or redevelopment. Roads, driveways, and utilities are permitted within lands analogous to RPA provided the provisions in 9 VAC 25-830-130 and 9 VAC 25-830-140 are satisfied including compliance with the requirements of the *Virginia Erosion and Sediment Control Handbook*, and stormwater management criteria consistent with water quality protection provisions of the Virginia Stormwater Management Regulations.

Land clearing or the installation of impervious cover, if not specifically for water-dependent uses, is allowed within lands analogous to RPA provided it meets the requirements for redevelopment, that is, the proposed land disturbance cannot encroach further into, or exceed the total area of existing impervious cover.

(ii) 1998 Federal Agencies' Chesapeake Ecosystem Unified Plan

The 1998 *Federal Agencies' Chesapeake Ecosystem Unified Plan* requires the signatories to fully cooperate with local and state governments in carrying out voluntary and mandatory actions to comply with the management of stormwater. The signatories also committed to encouraging construction design that minimizes natural area loss on new and rehabilitated federal facilities, adopts low impact development and best management technologies for stormwater and erosion and sediment control, and reduces impervious surfaces.

(iii) Chesapeake 2000

The Chesapeake 2000 agreement committed the government agencies to a number of sound land use and stormwater quality controls. The signatories additionally committed the agencies to lead by example with respect to controlling nutrient, sediment and chemical contaminant runoff from government properties. In December 2001, the Executive Council of the Chesapeake Bay Program issued Directive No. 01-1: *Managing Storm Water on State, Federal and District-owned Lands and Facilities*, which includes specific commitments for the signatories to lead by example with respect to stormwater control.

8(d) Conclusion. DEQ-OSWM concludes that the proposal is consistent, to the maximum extent practicable, with the coastal lands management enforceable policy of the VCP as administered through the Bay Act and *Regulations* provided it is consistent with the above-mentioned requirements.

ADDITIONAL ENVIRONMENTAL CONSIDERATIONS

In addition to the enforceable policies of the VCP, comments were also provided with respect to other applicable requirements and recommendations. The applicant must ensure that this project is constructed and operated in accordance with all applicable federal, state, and local laws and regulations.

1. Solid and Hazardous Waste Management.

1(a) Agency Jurisdiction. Solid and hazardous wastes in Virginia are regulated by the Virginia Department of Environmental Quality, the Virginia Waste Management Board (VWMB) and the U.S. Environmental Protection Agency. They administer programs created by the federal Resource Conservation and Recovery Act, Comprehensive Environmental Response Compensation and Liability Act, commonly called Superfund, and the Virginia Waste Management Act. DEQ administers regulations established by the VWMB and reviews permit applications for completeness and conformance with facility standards and financial assurance requirements. All Virginia localities are required, under the Solid Waste Management Planning Regulations, to identify the strategies they will follow on the management of their solid wastes to include items such as facility siting, long-term (20-year) use, and alternative programs such as materials recycling and composting.

1(b) Agency Findings. The DEQ Division of Land Protection and Revitalization (DLPR) (formerly the Waste Division) conducted a geographic information system (GIS) database search of waste sites within a 500-foot radius of the project site and a cursory review of DEQ data files for waste sites within the project zip code. DEQ-DLPR determined that there is one Resource Conservation and Recovery Act hazardous waste site and two petroleum release sites in proximity to the project site. Additional information on these sites is contained in DEQ-DLPR's detailed comments attached to this response.

1(c) Recommendations.

(i) Resource Conservation and Recovery Act Site

The following websites may be accessed to locate additional information for the RCRA site using its identification number:

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

(ii) Petroleum Release Sites

The petroleum release sites should be evaluated by the project engineer or manager to establish the exact location of the release and the nature and extent of the petroleum release and the potential to impact the proposed project. Contact the DEQ Tidewater

Regional Office at (757) 518-2115 for further information and the administrative records of the sites which are in close proximity to the proposed project.

(iii) Pollution Prevention

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

1(d) Requirements.

(i) Waste Management

Any soil that is suspected of contamination or wastes that are generated during construction-related activities must be tested and disposed of in accordance with applicable federal, state, and local laws and regulations. All demolition and construction waste, including excess soil, must be characterized in accordance with the *Virginia Hazardous Waste Management Regulations* prior to disposal at an appropriate facility.

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

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

Questions or requests for further information regarding these comments may be directed to DEQ-DLPR, Steve Coe at (804) 698-4029.

2. Petroleum Storage Tanks.

2(a) Agency Findings. According to DEQ-TRO there have been no petroleum releases reported at or adjacent to the project site.

2(b) Requirements.

(i) Petroleum Release

If evidence of a petroleum release is discovered during construction of this project, it must be reported to DEQ-TRO. Petroleum contaminated soils and groundwater generated during construction of this project must be properly characterized and disposed of properly.

(ii) Portable AST Registration

The installation or use of a portable aboveground storage tank (AST) with a capacity of greater than 660 gallons for more than 120 days must be registered with DEQ using *AST Registration Form 7540-AST*. This form is available on DEQ's web site at <http://www.deq.virginia.gov/Programs/LandProtection/Revitalization/PetroleumProgram/FilesForms.aspx>. The registration should be mailed to the DEQ address listed on the form along with the listed registration fee.

3. Natural Heritage Resources.

3(a) Agency Jurisdiction.

(i) Department of Conservation and Recreation

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

(ii) Department of Agriculture and Consumer Services

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

3(b) Agency Findings. The DCR Biotics Data System documents the presence of natural heritage resources in the project area. However, due to the scope of the activity and the distance to the resources, DCR-DNH does not anticipate that this project will adversely impact these natural heritage resources.

(ii) Threatened and Endangered Plant and Insect Species

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

(iii) State Natural Area Preserves

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

3(c) Recommendations. The Navy should contact DCR-DNH to secure updated information on natural heritage resources if a significant amount of time passes before the project is implemented. New and updated information is continually added to the Bioitics Data System.

4. Wildlife Resources and Protected Species.

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

4(b) Agency Findings.

(i) Mabee's Salamander

According to DGIF records, the state-listed threatened Mabee's salamander has been documented from the project area. This species is known to inhabit upland areas associated with fish-free sinkhole ponds (vernal pools), which are utilized during breeding.

(ii) Bald Eagle

DGIF documents bald eagle nests and a bald eagle concentration zone from the project area. However, DGIF does not anticipate this project to result in adverse impacts upon bald eagles.

4(c) Recommendations.

(i) Mabee's Salamander

If habitat for the Mabee's salamander is proposed for impact, DGIF recommends further coordination with agency staff regarding protection of this species.

(ii) Bald Eagle

DGIF recommends the Navy coordinate with the U.S. Fish and Wildlife Service (USFWS) regarding possible impacts upon bald eagles.

(iii) General Protection of Wildlife Resources

DGIF offers the following recommendations to minimize overall impacts to wildlife and natural resources as a result of proposed development activities:

- Avoid and minimize impacts to undisturbed forest, wetlands, and streams to the fullest extent practicable.
- Maintain undisturbed naturally vegetated buffers of at least 100 feet in width around all on-site wetlands and on both sides of all perennial and intermittent streams.
- Adhere to a time-of-year restriction protective of resident and migratory songbird nesting from March 15 through August 15 of any year for all tree removal and ground clearing.
- Adhere to erosion and sediment controls during ground disturbance.
- Design stormwater controls to replicate and maintain the hydrographic condition of the site prior to the change in landscape. This should include, but not be limited to,
 - utilizing bioretention areas, and
 - minimizing the use of curb and gutter in favor of grassed swales.

Bioretention areas (also called rain gardens) and grass swales are components of Low Impact Development (LID). They are designed to capture stormwater runoff as close to the source as possible and allow it to slowly infiltrate into the surrounding soil. They benefit natural resources by filtering pollutants and decreasing downstream runoff volumes.

5. Water Supply.

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

5(b) Agency Comments. VDH reviewed the FCD and found that there are no groundwater wells within a 1-mile radius of the project site. The City of Newport News

Skiffes Creek surface water intake is located approximately 3.5 miles from the project site. The project is not within Zone 1 (up to 5 miles into the watershed) or Zone 2 (greater than 5 miles into the watershed) of any public surface water sources.

5(c) Requirement. Potential impacts to public water distribution systems must be verified by the local utility.

5(d) Conclusion. VDH concludes that there are no apparent impacts to public drinking water sources due to this project.

Contact VDH, Ezekiel Dufore at (804) 864-7201 for additional information.

6. Forest Resources.

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

6(b) Agency Findings. DOF supports the Navy's willingness to voluntarily carry out construction activities consistent with the applicable performance standards for Chesapeake Bay Resource Protection Areas and Resource Management Areas, respectively. In addition, the Navy is committing to carrying out the proposed action consistent with its responsibilities under Executive Order 13508, "Chesapeake Bay Protection and Restoration" of May 12, 2009.

6(c) Conclusion. DOF concludes that adhering to applicable performance standards mitigates, to the maximum extent possible, any adverse impacts to forestland.

For questions and additional information regarding these comments, contact DOF, Greg Evans at (434) 220-9020 and/or Buck Kline at (434) 220-9035.

7. Historic and Archaeological Resources.

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

7(b) Agency Findings. DHR finds that no historic properties will be affected by the construction of the small arms range facility.

For additional information, contact DHR, Marc Holma at (804) 482-6090.

8. Local and Regional Comments.

8(a) Agency Jurisdiction. In accordance with the Code of Virginia, Section 15.2-4207, planning district commissions encourage and facilitate local government cooperation and state-local cooperation in addressing, on a regional basis, problems of greater than local significance. The cooperation resulting from this is intended to facilitate the recognition and analysis of regional opportunities and take account of regional influences in planning and implementing public policies and services. Planning district commissions promote the orderly and efficient development of the physical, social and economic elements of the districts by planning, and encouraging and assisting localities to plan, for the future.

8(b) Agency Findings. Note that York County and James City County comments are reflected in Hampton Roads Planning District Commission comments below.

(i) York County

York County finds the following:

- It appears that the construction of the rifle range will occur within areas analogous to RPA.
- The project proposes pit toilets in a watershed which is subject to a Total Maximum Daily Load (TMDL) due to bacterial contamination.
- It appears that there are no proposed stormwater management facilities for the quantity or quality control of runoff.
- The project is located within the county's Historical Resources Management Overlay District where a Phase I archaeological study is typically required prior to construction.
- A residential development is proposed approximately 0.4-mile north of the proposed expanded rifle range.

(ii) James City County

Interstate 64 from Newport News to Route 199 in James City County has been identified as a future road widening project by the Hampton Roads Transportation Planning Organization. However, it is unknown at this point the exact location and amount of right-of-way that would need to be acquired to complete this project.

(iii) Hampton Roads Planning District Commission

The staff of the Hampton Roads Planning District Commission (HRPDC) reviewed the consistency determination and contacted the local staff from York County and James City County. HRPDC finds that the proposal appears to be consistent with regional plans and policies. However, both counties have expressed concerns (noted in this section) with the current design or placement of the facility and would prefer that the current plans be amended to address those concerns.

- The current plans could cause significant noise impacts to the surrounding area. A residential development is currently proposed in York County less than half a mile from the proposed rifle range.
- Interstate 64, located adjacent to both proposed ranges, will eventually be widened to four lanes in each direction from Newport News to Richmond. This should be accounted for in the layout and placement of the ranges.
- It appears that the construction of the rifle range will occur within a Chesapeake Bay Preservation Act (CBPA) Resource Protection Area. According to York County's Code of Ordinances, RPAs "have an intrinsic water quality value due to the ecological and biological processes they perform or are sensitive to impacts, which may result in significant degradation to the quality of state waters."
- The construction of the rifle range and new pistol range facility will occur in the King Creek Watershed, which currently is impaired for both recreation (due to the presence of enterococcus) and shellfishing (due to the presence of fecal coliform). A bacterial TMDL has been developed for the Queen Creek, King Creek, and Felgates Creek watersheds. The FCD mentions the use of septic tanks and leach field systems for on-site wastewater disposal. Coordinate with the county to determine the optimal placement of any on-site wastewater facilities.
- York County is also entirely located within the Chesapeake Bay Watershed, which is subject to the Chesapeake Bay TMDL. The HRPDC staff recommends that the Navy provide more detail on what stormwater management facilities will be used to mitigate water quality impacts.
- York County staff reports that the project site is located within the County's Historical Resources Management Overlay District, which would normally require that the development undergo a Phase I archaeological study prior to construction. The HRPDC staff recommends that the Navy coordinate with York County to implement this policy to the maximum extent practicable.

8(c) Recommendations.

(i) York County

York County recommends the following:

- The range location should be adjusted to occur outside the limits of the RPA to the extent possible (see section 8. Coastal Lands Management, page 10-12).

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- Do not use pit toilets (see section 6. Shoreline Sanitation, page 9).
- Use noise attenuation to the extent practical.

(ii) James City County

James City County recommends the following:

- Locate activities a sufficient distance from I-64 to buffer for any future construction.
- Continue to maintain the heavily wooded buffer along I-64 and plan for sufficient screening when I-64 is widened.
- Consider noise mitigation measures to prevent disruptions to surrounding property owners.

For more information, contact: York County, Al Maddalena at (757) 890-3523; James City County, Luke Vinciguerra at (757) 253-6685; or HRPDC, Dwight Farmer at (757) 420-8300.

REGULATORY AND COORDINATION NEEDS

1. Wetlands Management. Proposed surface water and wetland impacts will require authorization through the Virginia Water Protection Permit program pursuant to Virginia Code §62.1-44.15:5. Review under the WPP program is accomplished through the Joint Permit Application process involving the VMRC, DEQ, Corps, and local wetlands boards. For additional information and coordination regarding the WPP, contact DEQ-TRO, Bert Parolari at (757) 518-2166.

2. Nonpoint Source Pollution Control.

2(a) Erosion and Sediment Control and Stormwater Management Plans. This project must comply with Virginia's *Erosion and Sediment Control Law* (Virginia Code § 62.1-44.15:61) and *Regulations* (9 VAC 25-840-30 *et seq.*) and *Stormwater Management Law* (Virginia Code § 62.1-44.15:31) and *Regulations* (9 VAC 25-870-210 *et seq.*) as administered by DEQ. Activities that disturb 2,500 square feet or more in CBPAs would be regulated by VESCL&R and VSWML&R. Erosion and sediment control, and stormwater management requirements should be coordinated with the DEQ Tidewater Regional Office, Noah Hill at (757) 518-2024.

2(b) Virginia Stormwater Management Program General Permit for Stormwater Discharges from Construction Activities. For projects involving land-disturbing activities of equal to or greater than 2,500 square feet or more in CBPAs, the applicant is required to apply for registration coverage under the Virginia Stormwater Management Program General Permit for Discharges of Stormwater from Construction Activities (9 VAC 25-870-1 *et seq.*). Specific questions regarding the Stormwater Management Program requirements should be directed to DEQ, Holly Sepety at (804) 698-4039 or Shantelle Nicholson at (804) 698-4085.

3. Point Source Pollution Control. Pursuant to Virginia Code §62.1-44.15, the Navy must implement structural and housekeeping best management practices (BMPs) to prevent metals leaching to the groundwater and surface water. Coordination involving the reissuance of the facility's VPDES permit may accomplished by contacting DEQ-TR0, Mark Sauer at (757) 518-2105.

4. Shoreline Sanitation. The construction and operation of the onsite sewage treatment systems must be consistent with the shoreline sanitation enforceable policy of the VCP as administered by VDH pursuant to Virginia Code Sections 32.1-164 A. and B. The Navy may coordinate with VDH through its office at the Peninsula Health District, Army Pemberton at (757) 603-4277.

5. Air Pollution Control. Guidance on minimizing the emission of volatile organic compounds (VOCs) and oxides of nitrogen (NO_x) during construction may be obtained from DEQ-TR0. Activities associated with this project are subject to air regulations administered by DEQ. The state air pollution regulations that may apply to the construction phase of the project are:

- asphalt paving operations (9 VAC 5-40-5490 *et seq.*)
- fugitive dust and emissions control (9 VAC 5-50-60 *et seq.*); and
- open burning restrictions (9 VAC 5-130).

Contact the York County and/or James City County fire officials for any local requirements on open burning. For additional information, contact DEQ-TR0, Troy Breathwaite at (757) 518-2006.

6. Coastal Lands Management. This project must be consistent to the maximum extent practicable with the coastal lands management enforceable policy of the VCP as administered by DEQ through the *Chesapeake Bay Preservation Act* (Virginia Code §§ 62.1-44.15:67 through 62.1-44.15:78) and *Chesapeake Bay Preservation Area Designation and Management Regulations* (Virginia Code 9 VAC 25-830-10 *et seq.*). To ensure project consistency, the Navy must continue to coordinate with DEQ-OSWM, Nancy Miller at (804) 445-4435.

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

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

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Some of the applicable Federal laws and regulations are:

- *Resource Conservation and Recovery Act (RCRA)* (42 U.S.C. Section 6901 *et seq.*);
- Title 40 of the Code of Federal Regulations; and
- U.S. Department of Transportation Rules for Transportation of Hazardous materials (49 CFR Part 107).

For additional information, contact DEQ-TRO, Milt Johnston at (757) 518-2151.

7(a) Asbestos-Containing Material. It is the responsibility of the owner or operator of a demolition activity, prior to the commencement of the demolition, to thoroughly inspect the affected part of the facility where the operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material (ACM). Upon classification as friable or non-friable, all waste ACM shall be disposed of in accordance with the Virginia Solid Waste Management Regulations (9 VAC 20-80-640), and transported in accordance with the Virginia regulations governing Transportation of Hazardous Materials (9 VAC 20-110-10 *et seq.*). Contact the DEQ-DLPR, Linda Richardson at (804) 698-4318 and the Department of Labor and Industry, Ronald L. Graham at (804) 371-0444, for additional information.

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

8. Petroleum Storage Tanks.

(i) Petroleum Release

If evidence of a petroleum release is discovered during construction of this project, it must be reported to DEQ-TRO. Contact Lynne Smith at (757) 518-2055 or Gene Siudyla at (757) 518-2117 to report a release.

(ii) Portable AST Registration

The project proponent must register portable ASTs (>660 gallons) installed or used for more than 120 days with DEQ. Tank registration may be accomplished by contacting DEQ-TRO, Tom Madigan at (757) 518-2115 or temadigan@deq.virginia.gov.

9. Natural Heritage Resources. The Navy should contact DCR-DNH, Rene Hypes at (804) 786-7951 to secure updated information on natural heritage resources if a significant amount of time passes before the project is implemented.

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10. Wildlife Resources and Protected Species.

(i) *Mabee's Salamander*

Coordination for potential project impacts on the Mabee's salamander may be coordinated with DGIF, Amy Ewing at (804) 367-2211.

(ii) *Bald Eagle*

Contact the USFWS Virginia Field Office at (804) 693-6694 regarding possible impacts upon bald eagles.

(iii) *General Protection of Wildlife Resources*

Strategies and measures for the overall protection of wildlife resources may be coordinated with DGIF, Amy Ewing at (804) 367-2211.

11. Water Supply. Water supply impacts may be coordinated with the York County Department of Environmental and Development Services, Utilities Division at (757) 890-3752.

Thank you for the opportunity to comment on this FCD. The detailed comments of reviewing agencies are attached for your review. If you have questions, please call me at (804) 698-4325 or John Fisher at (804) 698-4339.

Sincerely,



Ellie Irons, Program Manager
Environmental Impact Review

Enclosures

Ec: Cindy Keltner, DEQ-TRO
Steve Coe, DEQ-DLPR
Kotur Narasimhan, DEQ-AIR
Larry Gavan, DEQ-OSWM
Shantelle Nicholson, DEQ-OSWM
Daniel Moore, DEQ-OSWM
Tony Watkinson, VMRC
Amy Ewing, DGIF
Robbie Rhur, DCR
Keith Tignor, VDACS
Barry Matthews, VDH
Roger Kirchen, DHR
Greg Evans, DOF

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Buck Kline, DOF
Al Maddalena, York County
Luke Vinciguerra, James City County
Dwight Farmer, Hampton Roads PDC
Glenn ReDavid, Navy