



The Mount Vernon Council of Citizens Associations, Inc.

P.O. Box 203, Mount Vernon, VA 22121-9998

<http://www.mvcca.org>

Kelly Atkinson
Director, Planning Division and Senior Staff Coordinator
Fairfax County Government
12055 Government Center Parkway, Suite 730
Fairfax, VA 22035

May 30, 2025

Dear Ms. Atkinson,

**Reference: MOUNT VERNON COUNCIL OF CITIZENS' ASSOCIATIONS (MVCCA)
Resolution Providing Comment on the Environmental Element of the Plan Forward draft
dated 4/1/2025 (MVCCA, E&R 2025-03)**

**The Mount Vernon Council of Citizens' Associations (MVCCA) has reviewed the
Environmental Element of the Plan Forward draft dated 4/1/2025 and has provided our
comments in the attached resolution.**

**We found the draft to contain a number of material and editorial issues that are discussed
in the resolution and we ask that they be addressed and a new draft be put out for an
additional round of comments. We welcome questions and thank you for your
consideration of these comments.**

Scott Taylor
Co-chair MVCCA

cc: Fairfax County Board of Supervisors

Attachment: Resolution

MOUNT VERNON COUNCIL OF CITIZENS' ASSOCIATIONS (MVCCA) Resolution
Providing Comment on the Environmental Element of the Plan Forward draft dated 4/1/2025
(MVCCA, E&R 2025-03)

Whereas, the MVCCA, an organization representing approximately 40 community associations in the northern half of the Mount Vernon District, routinely reviews environmental activities, site plans, pollutant threats, and other issues that are of concern to residents of the Mount Vernon District;

Whereas, the Environmental Element will guide policy development and guide decisions on projects that are not by right;

Whereas, the plan should be clear in providing a vision for the future so that developers, investors, and the community will have a shared understanding of expectations;

Whereas, the components of the Policy Plan, which includes the Environmental Element have been underway for 3 years,

Whereas, while the draft Environmental Element was released for comment on April 1, it failed to reflect significant comment from other county departments;

Whereas, the draft has many issues including:

- a) The description of compliance with the ozone standard is problematic. While the language claims that ozone levels have been declining in recent years, the Washington Metropolitan area has been hovering around 70 ppb for about 15 years. The region is applying for exemptions that will allow for a change to attainment status even though there were 4 days in 2025 that exceeded the standard level.
- b) While the draft highlights some environmental programs, it fails to provide comprehensive information (for example, NAAQS are highlighted, but other air pollutants and the means to manage them so that the public is not at risk are not addressed) (e.g., page 3, Objective 1);
- c) The draft lacks information to guide outreach so that county residents and businesses can be informed of expectations;
- d) The draft highlights the importance and restrictions for Resource Protection Areas and waterways, but these provisions are not well understood. Both Virginia law and the county have been increasingly restrictive. The county should acquire undeveloped RPA areas so that they can be managed as the county desires;
- e) In addition to design and construction of facilities, like stormwater management, monitoring, and maintenance should be included (Page 6 bullet 4);
- f) The draft is very limited in discussing pollutants because there are many pollutants that can or do pose risks in the county, such as ozone, lead, PFAS, and other pollutants.

Whereas, different elements of the comprehensive plan should all work together, and the timing for the release of a version of the Environment Element that is ready for review makes it very difficult for organizations to comment on plans because a revision was expected that has not yet been provided;

Whereas, while Department of Planning and Development stated that an updated draft would be available by the end of April so that comments could be prepared by the May 30 deadline, no update to the draft has been provided;

Therefore, be it resolved, the MVCCA asks that the Board of Supervisors extend the comment period to at least one month past the release of the last element to be reviewed in Phase 1 so that important relationships among these documents can be compared;

Be it further resolved that the many technical and editorial issues be addressed and a revised draft, at least for the Environmental Element, be circulated for review with ample time for review;

Be it finally resolved that the county hold outreach sessions with the draft documents to discuss comments, how the documents interrelate, and explain how they would aid in future decisions.