

The Mount Vernon Council of Citizens Associations, Inc.

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

http://www.mvcca.org

August 31, 2017

Mr. Bill Sanders Director of Public Works Directorate of Public Works United States Army Garrison, Fort Belvoir 9820 Flagler Road Suite 213 Fort Belvoir, VA 22060

Re: Comments MOU Woodlawn East Development

Mr. Sanders,

The enclosed comments are forwarded regarding the Woodlawn East Development MOU. The Mount Vernon Council of Citizen's Associations (MVCCA) is pleased to offer our constructive comments and look forward to working with the post on this important matter.

Ms. Cathy Ledec our Environmental Committee Chair is our point of contact. Chair.er@mvcca.org

Katheríne Ward

Katherine Ward Co-Chair **MVCCA**

Enclosed: August 29, 2017

Memorandum of Agreement Among U. S. Army Garrison, Fort Belvoir, Virginia; The Virginia State Historic Preservation Officer; The Advisory Council on Historic Preservation; and Fort Belvoir Residential Communities LLC to mitigate adverse effects to the Dogue Run Farm Earthen Berm Fence for the Construction of Family Housing at Fort Belvoir, Virginia

Comments submitted by Catherine C. Ledec, Chair, Environment and Recreation Committee Mount Vernon Council of Citizens' Associations

Mitigation Hierarchy: Avoid, Minimize, Mitigate, Restore, Compensate

The MOA indicates that the Undertaking will adversely impact the Berm Fence what actions are being taken by the project to avoid this? Avoidance should be the top priority. The layout of the community should work around the unique and important features of the site preserving and protecting these historic and natural resources (including wetlands, trees and other vegetation).

Minimization of Effects to Historic Properties and Natural Resources: Page 2 of the MOA under Stipulations Section I: the MOA states that the mitigation plan "provides design plans for the location of the roadway, utility, and other crossings of the Berm Fence (which will be limited to the greatest extent possible to the six (6) areas of disturbance as depicted on Attachment D) for the Undertaking and for the proposed treatment of other areas of the Berm Fence that will be preserved."

Six areas of disturbance is too many – these are not needed and can be eliminated. We recommend redesigning the layout of the Family Housing development **around these important historic features in order to preserve the historic resources** <u>and</u> **the natural resources** on this property. Further they should be designed such that they will be preserved and protected in perpetuity and that this preservation is sustainable in the long term.

Road connections that cross over the earthen berm should be eliminated, these are not necessary. Road connections should be established directly to Pole Road and Plantation drive rather than crossing directly through (even though through a disturbed area) the earthen berm. These roads should be dead-ended with a turnaround/cul-de-sac rather than passing through the berm.

We remain concerned about the direct and indirect impacts of this housing development on natural and historic resources. For example indirect impacts include changing the surface and subsurface water flows resulting in dry up all wetlands on the site. Road crossings through the berm even if through the disturbed areas will result in increasing the area of disturbance into intact areas of the berm.

On page 3, section 1 A, 2. Walking Trail: Any reference to a walking trail should also reference a protective buffer area for any historic or natural resources. Designs and placement of a walking trail should take into account indirect management techniques for managing walkers such that the users are kept ON the trail. Some techniques include using a second layer of fencing on the edges of the trail, or constructing the trail as a raised boardwalk with fencing on the boundary.

Vegetation management should reference restoration of vegetation to that which is historically accurate and/or that which will protect and preserve the historic and natural resources in perpetuity with minimal human intervention. Removal of other vegetation on and within a designated buffer around the Berm Fence should be done consistent with management of these natural resources for wildlife. Only native plants should be used. Wheeled and tracked equipment on the Berm Fence **should be prohibited**.

Any contracts entered into with third party contractors for vegetation management should have special provisions included in the contracts that are reviewed and accepted by consulting parties. These contracts should include special instructions for work on the earthen berm and penalties for non-compliance or deviations.

Procedures for Chance Finds of archaeological artifacts or rare natural resources should also be included in any contracts issued for this Undertaking including specific actions plans including work stoppage for investigations if found.

On page 3, section 1 A 3: There is reference to "...an educational display on the history of the Dogue Run Farm and George Washington's Experimental farming practices and alternatives to post and rail fences..." Where will this be located? This should be explicitly referenced in the MOA.

We recommend adding this - it seems to have been missed:

At a recent meeting with the Mount Vernon Council of Citizens' Associations there was mention of a display area in a community center that will be provided. This publicly accessible exhibit is not mentioned in the MOA and appears to have been missed. Interest in these historic and natural resources is not just local, but is international in scope and the displays and materials prepared should match the level of importance.

The preparation of the referenced educational displays and educational pamphlets must be coordinated with historic resources staff at the Mount Vernon Estate, the Fairfax County Park Authority (where related resources that are on the adjacent Huntley Meadows Park) and the National Trust for Historic Preservation, if appropriate. This should be explicitly stated in the MOA. Interest in these resources is not just with Fort Belvoir, but includes interest that is nation-wide and international in scope. It is critical to coordinate, collaborate and partner with these groups to ensure the consistency of the message and story being told.

On page 4, Section 1, C 2

The \$20,000 of funding noted herein is not adequate to cover the preparation of an exhibit in a community center, educational display nearby the site and pamphlets. \$20,000 will only cover research, design/layout and printing of the pamphlet.

Copyright and Intellectual Property

Any materials prepared should be done in collaboration with the historic resources staff at the Mount Vernon Estate and the FCPA and should include publishing these materials on these respective Web sites including the web site for Fort Belvoir. Copyright to materials prepared should be shared with the Mount Vernon Estate since the historic resource is directly related to our nation's first President.

We recommend adding the following to the MOA:

At completion of the Undertaking a special event should be organized (which could be repeated annually in coordination with the Mount Vernon Estate) to unveil this important historic finding that is of interest nation-wide and internationally. Local elected officials and dignitaries, Mount Vernon Estate officials, neighbors, and Fairfax County Government Officials (including the FCPA) should be invited to an unveiling event. This event should include an educational symposium/talk that describes the finding and should be timed to coordinate off of other events that could raise the profile of the importance of the finding. This should include appropriate press and media coverage and videos of the event posted online as an additional educational tool for the public. All of this work should also be coordinated with the Mount Vernon District Supervisor's office and consulting parties. The importance of local coordination of this finding must be taken into consideration.

Consulting Parties:

Please add as consulting parties to this Undertaking the following:

- (1) Mount Vernon District Supervisor Daniel G. Storck (c/o <u>Donna.slaymaker@fairfaxcounty.gov</u>)
- (2) Mount Vernon District Tree Commissioner (Catherine Ledec <u>ledecinvirginia@yahoo.com</u>),
- (3) Mount Vernon District History Commissioner (Sally Lyons, <u>lyonshare@cox.net</u>)
- (4) Fairfax County Park Authority (David Bowden, Director Planning and Development, Fairfax County Park Authority, <u>david.bowden@fairfaxcounty.gov</u>),
- (5) Huntley Meadows Park staff (Karen Sheffield, Park Manager karen.sheffield@fairfaxcounty.gov),
- (6) Friends of Historic Huntley, (Todi Carnes, todicarnes@verizon.net)
- (7) Mount Vernon Estate staff (Luke Pecararo, Director of Archaeology <u>LPecoraro@mountvernon.org</u>),
- (8) National Trust for Historic Preservation?

We recommend these interested parties be specifically included as consulting parties in order to coordinate treatment and documentation of the history and story content of directly related historic resources of our nation's first President.