



The Mount Vernon Council of Citizens Associations, Inc.

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

<http://www.mvcca.org>

Heather Cisar
Fort Belvoir Environmental Division
Directorate of Public Works, Building 1442
9430 Jackson Loop
Fort Belvoir, VA 22060

RE: Comments on the Draft Environmental Assessment (EA) for the Proposed Fort Belvoir North Area Distribution Center

Dear Ms. Cisar,

July 12, 2022

The Mount Vernon Council of Citizens Associations (MVCCA) thanks you for the opportunity to provide comments on the proposed construction of a 525,000 warehouse and administrative building with associated parking and convert storage for approximately 600 personnel.

In our review of the draft EA, we identified the following areas that we request be addressed:

1. Contamination from UXO and contaminants of concern: While the maps in the body of the report show the presence of surface water and wetlands, they do not show the relationship between UXO and contaminants of concern, which is important because it is unclear if the project is likely to result in the release of contaminants of concern to surface water and wetlands. This is important information that we request be provided for this and future EAs.
2. Land Use Controls: While the EA notes the use of Land Use Controls (LUC), the EA fails to either list or map the LUCs. Mapping the LUCs is critical to seeing that the LUCs will cover the areas with contaminants of concern and UXO so that health and the environment will be protected. The presence of some LUCs, as presented in the EA is insufficient to assess the adequacy of LUCs. This information on LUCs is critical because LUCs must typically be layered and include enforceable components to be effective. This information is especially important to the MVCCA because contamination to the surface and ground waters can impact wildlife and be spread downstream to waters outside the base.
3. On page 3-35 the document states "Construction activities may require measures to prevent vapor intrusion below ground levels." While there may be a greater threat of vapor intrusion

from construction below ground levels, buildings are typically designed so that air handling provides for negative air pressure inside the building relative to the outside. The negative inside pressure will pull VOCs from subterranean soils/groundwater into buildings. Thus, to protect base personnel, shouldn't all construction be evaluated to determine if LUCs are needed?

4. Removal of contamination: Where contamination is known to exist, the EA does not evaluate options to remove the contamination. Left in place contamination may continue to pose a threat to health and the environment if LUCs are ineffective. Effective LUCs should include a combination of LUCs that include enforceable LUCs and the more effective that LUCs are the more expensive. Over the long term the cost of the LUCs can exceed the cost of removal of contamination so shouldn't removal be explicitly addressed?
5. We agree with the comment from Kelly Atkinson that the level of LEED certification sought (at least LEED Gold should be sought).
6. On April 22, 2022, President Biden has set a goal of reducing GHG emissions to 50 percent from 2005 levels by 2030. What is Fort Belvoir doing to achieve that goal? The references in the EA do not reflect any efforts to reduce GHG but instead argue that facility emissions are not significant. Instead, we would expect that Fort Belvoir is seeking to employ renewable energy to reduce its GHG footprint and electric vehicles to reduce their GHG footprint from transportation. Fairfax County is in the process of developing detailed plans to address both GHG emission reductions and establish resilience to the impacts of climate change.

We thank you for the opportunity to review this EA and look forward to your response. Please respond directly to Christopher Morgan, Chair, MVCCA Environmental and Recreation Committee Chair chair.er@mvcca.org.

Katherine Ward

Katherine Ward
Cochair
MVCCA