



Preserving,
Enhancing,
and Celebrating
the *Blue Ridge Mountains*

Position statement on behalf of *Friends of the Blue Ridge Mountains*

MWEOC
Attn: K. Ellis
PO Box 129
Mt. Weather, VA 22611

Email: comments437ea@fema.dhs.gov

Re: Mount Weather Facility (MWEOC)

Dear Mr. Ellis:

In reviewing the Environmental Assessment report by the US Department of Homeland Security for Building 437, dated January 30, 2017, we appreciate the extensive research and sensitivity to the environment that went into the report. Given that the facility already exists and the new buildings would basically replace older ones, and given the environmental and conservation considerations addressed in the report, our comment consists of two consideration we would ask of you. As noted on page 3-26 of the report:

The most substantial changes to land use within the MWEOC will occur within the 900 Area where undeveloped forested land will be converted to buildings, roadways, parking areas, utilities, and landscaping. . . . In summary, future land uses within the MWEOC will exhibit a low-density office park character, remaining consistent with the character of the existing campus.

We request that the loss of this undeveloped forested land be mitigated by a substantial forest buffer strip¹ along the east boundary of the property, where the steep slopes begin and the facility is quite visible from the countryside below.

In addition, exterior lighting issues were not addressed. Based on recommendations from the Land Trust of VA easement template and recommendations from the Dark Sky Association:

Lighting should be limited to fully horizontally shielded lighting fixtures. The light element (lamp or globe) of a fixture shall not extend below the cut off shield

¹ A **buffer strip** is an area of land maintained in permanent vegetation that helps to control air, soil, and water quality, along with other environmental problems., Buffer strips enhance sediment filtration of nutrients and pesticides by slowing down runoff that could enter the local surface waters. The root systems of the planted vegetation in these buffers hold soil particles together which alleviate the soil of wind erosion and stabilize stream banks providing protection against substantial erosion and landslides. Areas with diverse vegetation provide more protection from nutrient and pesticide flow and at the same time provide better biodiversity amongst plants and animal.. Many government agencies provide incentives for conservation programs such as buffer strips because they help stabilize the environment even when the land is being used. Buffer strips not only stabilize the land but can also provide a visual demonstration that land is under stewardship. Source: https://en.wikipedia.org/wiki/Buffer_strip

Justification for the Request:

Loudoun County website (<https://www.loudoun.gov/index.aspx?nid=1443>) states: “rural land conservation is critical to preserving a sufficient supply of the land and water that is needed for farming. Protecting the integrity of the rural landscape also preserves essential historic resources, habitat for wildlife, and safeguards scenic views and recreation opportunities.” We, the *Friends of the Blue Ridge Mountains*, as protectors of this unique resource, positively agree with this policy. The existing facility is out of character and scale with the surrounding countryside. There are no such facilities of nearly that magnitude in this pastoral area. It is located in the area and view shed of farms, wineries and residences on large lots. The area is known for its natural beauty, rolling hills, the Appalachian Trail, vineyards, breweries, farm to table restaurants, and water sports on the Shenandoah. This is the character of the surrounding area.

In addition to the government’s conservation policy, private land owners have made enormous contributions to conserving our valuable rural resources. For example, the Leggett family donated 1,000 acres for a state on the nearby Short Hill. Other land owners along the Blue Ridge and Short Hill have placed development restrictions on about 14,000 acres. (The total preserved land in the County is more than 65,000 acres, representing almost 20% of Loudoun’s land, all this according the website).

The Mount Weather property is in the Mountainside overlay district. According to the 1993 revised Zoning Ordinance (Section 4-1601) The Purpose and Intent of the Mountainside Development Overlay District is to regulate land use and development on the mountainsides of the County, in such a manner as to provide for low density residential development in remote areas and to: (1) assure mountainside development will not result in substantial damage to significant natural resource areas, wildlife habitats or native vegetation areas; (etc., and (7) implement the intent of the Comprehensive Plan.

Sincerely,



Norman Myers, Vice President
Chairman Land Use Committee

Friends of the Blue Ridge Mountains

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