



[Fort Belvoir North Area Distribution Center Environmental Assessment](#)

Comments of the Friends of Accotink Creek

25 July, 2022

The Friends of Accotink Creek oppose the construction of the Distribution Center in a forested location with inevitable loss of carbon capture and habitat fragmentation.

1. Climate

"To keep the nation secure, we must tackle the existential threat of climate change. The unprecedented scale of wildfires, floods, droughts, typhoons, and other extreme weather events of recent months and years have damaged our installations and bases, constrained force readiness and operations, and contributed to instability around the world."

- Lloyd J. Austin III, Secretary of Defense, [Department of Defense Climate Risk Analysis](#), Report Submitted to National Security Council, October 2021.

"Accounting for the Benefits of Reducing Climate Pollution. (a) It is essential that agencies capture the full costs of greenhouse gas emissions as accurately as possible, including by taking global damages into account."

- [Executive Order 13990](#) of January 20, 2021

"...place the climate crisis at the forefront of this Nation's foreign policy and national security planning..."

- [Executive Order 14008](#) of January 27, 2021

"DoD has committed to reduce GHG emissions from non-combat activities 42 percent by 2025"

- [Distribution Center Environmental Assessment](#), p. 3-50

How does the Distribution Center project tackle the existential threat of climate change? The chart on p. 3-52 indicates annual CO₂e emissions of over 4000 tons per year, despite the LEED silver certification. Compare this with an estimated 750 tons per year of carbon capture by the 30 acres of mature forest to be cleared. Clearly this is an increase, not a decrease, in CO₂e emissions. If a compensating decrease in emissions from other sources is planned, we did not see it in the Environmental Assessment.

The changing climate will not give us points for good intentions and future plans. Climate change is happening now. We must all of us act yesterday to make the difficult choices needed to diminish the level of catastrophe. No one else will do it for us.

"...operational emissions would represent less than 0.005 percent of the total CO₂ emissions from the state. As such, air emissions produced during operation of the warehouse and administrative building would not meaningfully contribute to the potential effects of climate change..."

- [Distribution Center Environmental Assessment](#), p. 3-53

We all of us make contributions to CO₂ emissions that do not "meaningfully contribute" to climate change. Yet the cumulative effect (including the other buildings planned on FBNA) is changing the Earth. The time has come to make contributions to emissions reductions, however small, that cumulatively will "meaningfully contribute" to the solution.

2. Habitat

“Any fragmentation of ecological cores will result in an obligatory loss of benefits... Planners should strive to protect ecological cores in their entirety in order to retain these benefits not only for plant and animal populations, but for human communities.”

- [Virginia Conservation Vision Natural Landscape Needs Assessment](#)

We appreciate the efforts described in the Environmental Assessment to avoid the Accotink Creek Conservation Corridor and other environmentally sensitive areas. Yet the existence on and around this site of the Conservation Corridor, the DCR [Ecological Core](#) designation, and the Fort Belvoir Proving Ground Conservation Site (DCR) are all red flags warning us to spare these prime habitats along this beleaguered stream. Again, the effects are cumulative, including all the other buildings planned for FBNA, including the loss of much of this area to the extension of the Fairfax County Parkway.

3. Other

We refer to the recommendations of our [early input comments](#), especially to:

- Improve non-motorized transportation routes to Metro and Springfield
- Focus mitigation efforts nearby

“If not us, who? If not now, when?” - John Kennedy

Friends of Accotink Creek

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