



GREAT FALLS
CITIZENS ASSOCIATION

May 9, 2016

Honorable John Foust
Supervisor, Dranesville District
McLean Governmental Center
1437 Balls Hill Rd.
McLean, Virginia 22101

Dear Supervisor Foust:

I am writing on behalf of the Great Falls Citizens Association ("GFCA") regarding the pending rezoning and cluster development application for the Brooks Farm property, submitted by Basheer/Edgemore-Brooks LLC (RZ 2014-DR-022). In our September 2015 letter to you, we forwarded a copy of a May 2015 resolution adopted by the general membership of the GFCA opposing the proposed Brooks Farm rezoning. Since then, we and several neighboring HOAs and individuals have worked with the applicant to address the Great Falls community's concerns. Numerous GFCA board members and residents have devoted a great deal of time and energy to identifying solutions to the many issues left open after the County staff report was published in December 2015. Notwithstanding those efforts, the application remains unacceptable to the Great Falls community, and GFCA must therefore reiterate its opposition to the rezoning request and proposed development plan.

The GFCA board discussed the current status of the Brooks Farm application at its April 19, 2016 monthly board meeting and voted unanimously to write your office reiterating the GFCA membership's continued opposition to the application. In the GFCA's view, the applicant has failed in multiple ways to meet the objectives of the Fairfax County Comprehensive Plan, which recognizes the critical importance of good development:

Objective 8: Fairfax County should encourage a land use pattern that protects, enhances and/or maintains stability in established residential neighborhoods.

Policy a. Protect and enhance existing neighborhoods by ensuring that infill development is of compatible use, and density/intensity, and that adverse impacts on public facility and transportation systems, the environment and the surrounding community will not occur.

The current application is inadequate in numerous ways, including but not limited to the following:

- It fails to sufficiently address the environmental and storm water management concerns raised by experts engaged by GFCA and members of the Great Falls community.

- It contains an unacceptable plan for tree preservation and fails to address the likely damage to trees on adjacent properties.
- It includes requests for several waivers of county requirements, which seem unacceptable in an application for a cluster subdivision.
- It fails to address the potential negative consequences of an existing easement for access to Springvale Road, which easement was not voluntarily disclosed and was only recently discovered by community members after independent research of public records.

More specifically:

We are concerned that recommendations for and observations about storm water management have not been adequately addressed by the applicant. GFCA retained the services of Richard Klein, a noted environmental and storm water analyst, who testified before the Fairfax County Planning Commission in January 2016. Mr. Klein recommended that all storm water at Brooks Farm be managed with bioretention #2 facilities and discussed the likely adverse impacts on downstream ponds, streams and roads with cluster development of the Brooks Farm. His thoughtful recommendations for use of bioretention #2 facilities have not been followed by the applicant. In addition, he has pointed out that the baseline used by the applicant for determining phosphorus loads is faulty. Because the fields at Brooks Farm have been idle for many years, the assumption of "managed turf" used by the applicant for estimating baseline phosphorus loads overstates the baseline, thereby understating the increase in post-development discharge of harmful phosphorus into the downstream areas.

Additionally, the current plan fails to adequately meet the county's objective to preserve trees, which likewise impacts storm water management. The Brooks property is bordered by mature woodlands located on 22 adjacent properties. A certified arborist engaged by Great Falls residents has concluded that the current plan fails to ensure the preservation of specimen quality trees on the adjacent properties. The plan fails to address the potential cascading damage to the forested system that borders the property and ignores the value this forested area contributes to soil stability and long-term erosion protection for the RPA.

The applicant has requested waivers of two Public Facilities Manual (PFM) storm water requirements. We do not believe the applicant has demonstrated a need for such waivers, which should be used sparingly by the County, especially in an RPA-adjacent development such as Brooks Farm. In this case, there appear to be design alternatives that would achieve the storm water goals without waiving County requirements. We recommend that the County ask the applicant to submit plans for the drainage area that would demonstrate other means than through waivers.

Further, an additional community concern recently was triggered after public records research by the Lake Estates HOA uncovered a 1968 deed of easement that permits the Brooks Farm and adjacent property owners to combine their respective 16-foot and 34-foot parallel parcels of land to form a 50-foot wide parcel for a public road connecting Brooks Farm to Springvale Road. The terms of the easement permit either party to trigger this combination. As a result, the applicant appears to have the unilateral right to request VDOT approval to construct a roadway connecting the Brooks Farm property to Springvale Road, thereby creating a cut-through to Walker Road via Forest Lake Drive. This easement was

never disclosed by the applicant, and the resulting potential for a cut-through (which would be unacceptable to many residents) has never been discussed with the community.

It is our view that any doubts as to whether this rezoning application is in compliance with applicable ordinances and guidelines should be resolved in favor of those who currently reside in the community.

In short, the Great Falls community remains against this rezoning application. Thus, we request a meeting with you, representatives of the GFCA Board, and a few other residents who have been engaged in key issues pertaining to the proposal, to discuss the above and to better understand the steps you are taking to prevent the approval of this rezoning application.

Regards,

A handwritten signature in black ink, appearing to read 'M. Eric Knudsen', with a long horizontal flourish extending to the right.

M. Eric Knudsen
President