



**GREAT FALLS
CITIZENS ASSOCIATION**

February 3, 2016

Fairfax County Planning Commission
12000 Government Center Parkway, Suite 330
Fairfax, VA 22035

Re: Rezoning Application No. RZ 2014-DR-022
Brooks Farm Rezoning and Cluster Development Proposal

Dear Commissioners:

The Great Falls Citizens Association (GFCA), with nearly 900 members, contacted you last month about our concerns with this proposed rezoning and cluster development. I also spoke at the January 21 hearing to emphasize those concerns and answer your questions. As we noted in those communications, the GFCA membership remains opposed to this rezoning application and believes the development plan and proffers offered by the applicant to be insufficient to address the numerous concerns expressed by the community. **The January 21 hearing did not change our views and we urge you to postpone a vote on this application until community concerns are more adequately addressed.**

The community's lingering concerns include the following:

- **The application and Staff Report do not acknowledge or address the significant existing erosion and storm water damage to the Pond Branch Stream Valley**, which is downstream of the proposed subdivision. GFCA is concerned that the development of Brooks Farm will cause even greater downstream damage unless the subdivision is reduced in scope, the most effective storm water management techniques are implemented and maintained, and the existing degradation is corrected. We also question the utility of the promised stream surveys, when it appears the developer has only committed to "construction-related damage," and not damage caused by increased runoff from the developed property.
- Although the applicant purports to propose state-of-the-art storm water management techniques, **GFCA is concerned about the long-term maintenance of these facilities**. It is also our understanding that the new HOA will be required to maintain these storm water detention facilities in perpetuity. GFCA questions whether the community can be assured that the future HOA will have the funds, skill, or desire to maintain these relatively complex facilities. In contrast, proven options like dry ponds would present a viable alternative requiring little to no maintenance. GFCA values the use of low-maintenance options like dry ponds, even if it means that fewer lots could be developed.
- **The proposed development's proximity to, and negative effect upon, nearby Walker Lake is not being adequately addressed**. Walker Lake is a unique and sensitive environmental resource, and the adjacent residents have devoted significant time, effort and money to maintaining it. The Planning Commission heard testimony from Mr. Richard Klein, who explained how the proposed development will increase the phosphorous load on Walker Lake well beyond current conditions and acceptable limits. Mr. Klein's calculations show that if developed as a 5-acre subdivision with optimum methodologies, the phosphorous load created by the property could be significantly reduced to levels even below existing conditions.

Great Falls Citizens Association, P.O. Box 27, Great Falls, VA 22066

Mr. Klein pointed out during his testimony and January 21 dialogue with the Planning Commission that the County is not using the best bioretention standards on this property. We recommend the Commission direct county staff to upgrade its requirements for this sensitive environment area.

- The developer's **proffers should be specifically allocated for funding the restoration of Pond Branch Stream Valley**, as indicated in the County's Nichols Run/Pond Branch Stream Valley Restoration Plan of 2010.
- The proposed access to this property would require the removal of a major swath of hardwood forest and would require transversing the Environmental Quality corridor that the applicant says it seeks to preserve. In addition, the construction of the swale along much of the northern boundary will most likely compromise the root structure and viability of dozens of mature trees on those neighboring properties, leading to the likely loss of those trees to those residents and their costly removal. **The County Staff report has not given enough attention to the construction effects on trees in the proposed conservation easement and adjoining properties.**
- The applicant and the County staff report rely almost entirely on HOA enforcement and maintenance of the environmental control systems envisioned for this property. Hence, adherence to the HOA documents would be a critical part of the long-term environmental success or failure of this site. In light of this, we ask that the Planning Commission to **require the applicant to submit the proposed HOA manual to the County for public comment three to four weeks before the Board of Supervisors considers this application.**
- **Homeowners near the development remain concerned that their existing wells may be impacted.** An independent geo-hydrologist indicated that the developer's testing protocol is not representative of the real-world draw on the water table of 20 homes, each of 6,500-6,800 square feet, many with irrigation systems and pools. Moreover, the very limited testing was performed last spring when the water table was at its highest; a more robust testing in late summer/early fall and/or during drought conditions would be more representative. While the likelihood of an exhaustive draw on a shared water table may be low, the impact could have significant financial impacts on affected homeowners. Drilling a new well could run into the tens of thousands of dollars. If the developer is so highly confident that there will be no future issue, it should indemnify or insure nearby homeowners against this potentiality.

GFCFA looks forward to additional engagements with the County on this application, so that our community's concerns are addressed. Thank you.

Best Regards,



M. Eric Knudsen, President

cc: Board of Supervisors