



## GREAT FALLS CITIZENS ASSOCIATION (GFCA)

April 2, 2008

Mr. Bruce Nassimbeni, Director, Site Review East  
Land Development Services  
Environmental and Site Review Division  
12055 Government Center Parkway, Suite 535  
Fairfax, VA 22035-5503

Re: Goepfert Property Plan 024964-PL-001-1  
Goepfert Property Waivers 024964-WSVD-001, WTL-001, WSTL-001, WSW-001, WTL-002

Dear Mr. Nassimbeni:

Due to the location, size, and environmental conditions of the subject property, its development is significant to the Great Falls community. Thus, the Executive Board of the Great Falls Citizens Association (GFCA) is submitting this response to you based on the reviews of the subject preliminary plan and associated waiver requests by its Land Use, Transportation and Environment/Trails committees and consideration of the input it has received from affected property owners in the community. The Board has significant concerns regarding the streets, trails/sidewalks, and tree cover.

### Streets

1. We strongly object to the entrance to the subdivision being located on Georgetown Pike (Route 193). These objections are based on:
  - The general preservation of the Pike as reflected in VDHR's designation of the Pike as eligible for listing in the National Register of Historic Places, the County's Comprehensive Plan, VDOT's report to the Governor and General Assembly in Senate Document No. 47, Senate Joint Resolution No. 70 and the Georgetown Pike Traffic Calming Study.
  - The PFM provisions related to arterial road access.
  - The existence of an alternative access via Route 7.
  - The "real world" conditions that exist from previous development and secondary/private access road locations, as well as the uses made of Georgetown Pike.

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Our rationale is as follows:

- Georgetown Pike's special status among the Commonwealth's primary roads has been demonstrated foremost by its designation by VDHR as eligible for listing in the National Register of Historic Places. Its status is also recognized in the County's Comprehensive Plan. In its direction for the Pike, the Plan states: "... curb cuts should not be allowed unless no other alternative exists." As an alternative access to this property exists via Route 7, the plan cannot be considered to be in conformance with the Comprehensive Plan as the applicant represents in Note 9. In Senate Document No. 47, VDOT recommends that actions be taken to minimize the number of new entrances first by alternate access. VDOT, then, has reinforced the County's adopted policy by specifying alternate access as the first means of avoiding entrances on the Pike. Thus, the Route 7 access is the most responsive to VDOT's direction as adopted in Senate Document No. 47. Senate Joint Resolution No. 70 further charges VDOT to assist in preserving Georgetown Pike. This Resolution is being carried out in part through a Traffic Calming Study, the results of which are now being implemented. Over \$1 million of public funds are being committed to this effort, including County matching funds. To increase traffic and further exacerbate unsafe circulation patterns in one of the areas of the Pike identified as of greatest concern in the study after having expended these funds, and when there is an alternative, is imprudent public policy.
- PFM 2-0102.5 states that residential sites or lots in a subdivision are to be designed so that the sites or lots will not have direct access to any arterial road unless specified circumstances are determined to apply. Clearly the intent in part of this restriction is to minimize new subdivision curb cuts on arterial roadways. Both Georgetown Pike and Route 7 are arterial roadways. However, the applicant is proposing a subdivision entrance that does not already exist on the Pike whereas access to Route 7 can be made from an existing entrance via extension of the adjacent service road to the east. The Route 7 access then fulfills the intent of this PFM provision. Accordingly, the subject site should be designed with access to the subdivision provided through the F-1033 service road.
- The records indicate a clear intent for the F-1033 service road adjacent to the Goepfert property to be extended. As indicated on the plats, the Georgetown Court subdivision was required to escrow funds for future construction of the service road to the property line, which was in fact met in July 2000. Further, the pavement design for the service drive was based on 230 VPD from the adjacent acreage to the west (Goepfert) in addition to the 50 VPD from Georgetown Court. In addition to serving the Goepfert property, an extended service road with an additional outlet onto Route 7

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at its western terminus would provide an additional and improved access for the Georgetown Court subdivision and M.T.O. SHAHMAGHSOUDI Center. It would also serve as a safer ingress for those accessing the Dranesville Church of The Brethren, who must currently enter directly off of Route 7.

- Despite an existing “do not block intersection” sign at Falls Bridge Lane and attempted enforcement by the police, this intersection is consistently blocked by westbound evening rush hour(s) traffic. Three potentially deadly circumstances will be created by the location of the Goepfert entrance at this location: Any westbound, i.e., left hand turning vehicle, from the Goepfert subdivision that is fortunate enough to cross through the eastbound traffic that is heavy and constant but typically moving at the 40 mph speed limit, is unlikely to be fully integrated into the westbound line of traffic and thus will block the eastbound lane of Georgetown Pike. Our experience at similar intersections is that if at all possible, the blocked vehicles then cut to the right further endangering all. If not, they will create another problem that does not currently exist - backing up the eastbound Pike traffic to Seneca Road (a major problem intersection already) while waiting for the lengthy interval for the westbound traffic to clear. Most critically, this entire western area of Great Falls is within the first due response of Fire Station 39 which primarily uses this section of eastbound Georgetown Pike for its access. Second, sight distance at the existing Falls Bridge intersection is effectively non-existent for an extended period of time for those residents turning left onto eastbound Georgetown Pike. This subdivision would increase the vehicles using the intersection by 50% and by creating opposing turning maneuvers exponentially increase the danger of this sight distance problem. Third, the westbound Georgetown Pike traffic already often makes midblock “U” turns in this same area. It is reasonable to expect that they would now wait to the wider area of the Goepfert intersection to make this maneuver, again increasing the danger for all. Lastly, this subdivision would result in a 20% increase in VPD beyond what is generated by the households presently using public and private streets and individual driveways on Georgetown Pike (that unlike the Goepfert property had no alternative access). The difficulties of this area have been extensively documented in the Traffic Calming and other reports. We have no evidence that this situation will improve in the future. Therefore, the applicant’s planned entrance location for the subdivision is unacceptable to the community as proposed.

2. In view of the above considerations, GFCA must insist Waiver 24964-WSVD-001 as currently submitted be denied.

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3. We request that the subdivision streets be “ditch section” not “curb and gutter”. This request is based on:

- The greater environmental protection of stream headwaters recently endorsed by the Board of Supervisors.
- Preservation of the semi-rural aesthetic heritage of Great Falls.

Our rationale is as follows:

- The PFM does not require curb and gutter in R-1.
- This property is located in the headwaters of the Dog Run tributary of Difficult Run watershed.

4. A street light waiver (24964-WSTL-001) for Georgetown Pike is unnecessary with a subdivision entrance properly located on Leesburg Pike.

### Trails/Sidewalks

1. We strongly support the construction of trails and “sidewalks” required by the Comprehensive Plan and Public Facilities Manual and request that all proposed waiver requests be denied as submitted (24964-WTL-001 and -002, -WSW-001). These requests for denial are based on:

- The required trail along the north side of Leesburg Pike provides an extension of the existing adjacent trail to the east and continues along the property frontage to an existing intersection at Reston Avenue, thereby immediately creating an improved link between Reston Parkway and Avenue to serve northern users.
- The sidewalk (which the community wishes to be stonedust) required along the south side of Georgetown Pike increases the opportunity for, and the safety of, non-motorized transportation by providing pedestrian/bicycle facilities on both sides of the road where the trails plan does not already, and it does so immediately.
- The Colonial Gas pipeline trail included in the Comprehensive Plan reflects the alignment and surface that the community has supported based on its anticipated use, and was reaffirmed in the most recent review and revision of the Countywide Trails Plan.

Our rationale is as follows:

- A walkable/ridable community is one of the most highly valued elements of our recent 2020 Vision Survey results.

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- Even relatively short segments of trail/sidewalk are in fact used by people in our area; the three required trails/sidewalks work together and thus provide a substantial piece of the western Great Falls network to connect our community and link it to others.
  - There is a demonstrated immediate need for pedestrian/bicycle accommodations along both sides of Route 7 (evidenced, e.g., by a pedestrian being killed previously and another recently seen walking along this very property, grocery bags in hand). As there is no schedule for construction of this trail currently in VDOT or County future transportation plans, the applicant's trail construction will meet this immediate need.
  - There is a demonstrated immediate need for pedestrian/bicycle accommodations along Georgetown Pike as has been identified in the conduct of the traffic calming study and documented in numerous reports/submissions to the County and VDOT. In the short-term, the applicant's "sidewalk" will improve non-motorized access for all users until the north side trail is fully constructed and in the long-term will provide flexibility for users to choose either side of the road based on safety and their intended destination.
  - In Note 9 the applicant states that the plan is in conformance with the Comprehensive Plan, yet has submitted a lot layout that is then used as a rationale for seeking a waiver to the Comprehensive Plan for the Colonial Gas pipeline trail (WTL-002). The waiver proposes a more circuitous alignment and at least 3 surface transitions (natural surface trail, pond road, concrete sidewalk) – both of which are deleterious to users. Further, the applicant's proposal to align a non-motorized vehicle trail in a pond access road designed for vehicular use creates an inherent conflict that is unnecessary if the subdivision is in fact laid out to be in conformance with the Comprehensive Plan.
2. We do request that a "waiver of surface" be submitted by the applicant for the required "sidewalk" along Georgetown Pike, most importantly, and for the sidewalks along the interior subdivision streets.
- VDOT will permit stonedust walkways in its right of way.
  - The PFM does now provide for permeable surfaces in lieu of traditional concrete.
  - Permeable surfaces will reduce runoff in this environmentally sensitive area.
  - Permeable surfaces are consistent with the semi-rural aesthetic heritage of the community; stonedust is the preferred permeable surface for the Georgetown Pike Virginia Byway.
  - Users in the community have consistently expressed their preference for "soft" surfaces.

3. We do agree with the applicant that a sidewalk along the north side of Route 7 in addition to the required trail is not necessary.

### Tree Cover

The property totals 22 acres, of which over 17.5 acres are mature woodlands. The applicant proposes only 1.3 acres of this existing tree cover to remain – approximately 7%! The recently enacted VIRGINIA ACTS OF ASSEMBLY -- CHAPTER 333, which stipulates a 30% minimum tree cover for this zoning district and further provides for tree preservation as a means of meeting this level, serves as a useful benchmark for evaluating the reasonableness of the applicant's plan. Against these measures and others, we object to the applicant's tree cover submission as being inadequate.

1. We request that the tree cover requirements be met by the preservation of existing vegetation to a much greater degree than proposed by the applicant and even exceeded.
2. We request that any of the requirements not met by the above, be fulfilled by the planting of similar native species.
3. We request that the areas designated as tree save be put under conservation easement, to protect against their future removal by individual lot owners or the Homeowners Association if on "common property."

Our rationale is as follows:

- Properties in the vicinity which are adjacent to developments that removed the existing trees report an increase in noise levels of 40-50%. This is expected to be especially true in view of this property's location between two primary roadways whose traffic volumes are projected to increase significantly by VDOT. The noise attenuation benefits of trees with vegetation have been documented. For example, FHWA states that "A 200-foot width of dense vegetation can reduce noise by 10 decibels, which cuts the loudness of traffic noise in half." As little as 100 feet can provide at least half that benefit. It goes on to say that although it is often impractical to plant enough vegetation along a road to achieve such reductions, if dense vegetation already exists it could be saved to accomplish this effect.
- The environmental protection values of tree cover are also well documented: ground water retention, stream bank stabilization, wildlife habitat and carbon sequestration to name only a few. A mature tree stores an average of 667 pounds of carbon each year according to the nonprofit American Forest and this is important for global warming; saplings will take 70 years to duplicate the benefits of existing mature trees. Further, these values have been recognized in Fairfax County: In June 2007 the Board of Supervisors

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approved, as part of the Tree Action Plan, a goal of raising the tree canopy to 45%. To reverse the trend of the past 30 years where Fairfax County's tree cover has dropped from 70% to 41% due to development, however, requires the preservation and care of existing mature trees which are providing ecosystem benefits NOW.

- As this property abuts Georgetown Pike, the preservation of trees on it is significant to fulfilling the direction of the Comprehensive Plan, which emphasizes the preservation of the scenic significance and beauty of the corridor, consistent with its designation as Virginia's first Scenic Byway.

Thank you for your consideration of our comments. In view of the significant concerns our community has with the applicant's proposal, we respectfully request that you not approve this preliminary plan as submitted. If the Association can provide any further information or answer any questions please do not hesitate to contact me.

Sincerely,

*Jackie Taylor*

Jackie Taylor, President

Great Falls Citizens' Association

