



Goose Creek Association comments on Draft Natural and Environmental Resources Protection Standards: 5.03.01 and .02: River and Stream Corridor Resources

Table 5.03.01-1: We appreciate that Goose Creek is denoted as a Scenic River; however, please note that the North Fork of the Goose Creek is not so designated. The North Fork watershed constitutes approximately 65,000 acres in Loudoun County. It originates in the Blue Ridge Mountains and flows through regions of agricultural land as well as urban and suburban land, including the towns of Round Hill, Purcellville, and Hamilton, and the villages of Saint Louis, Philomont, and Bluemont. We would like to see the North Fork added to the table to be protected by the same standards as the Scenic Rivers, Potomac, and Bull Run. The illustration of the North Fork of the Goose Creek from the Loudoun County GIS mapping service is included with this correspondence. In addition:

- 1) Illustrations would be very helpful.
- 2) How do you determine what is a stream and if it drains 100 acres?
- 3) 50' on each side of flood plain? (presume resource protection area)
- 4) 5.03.02 – Indicates no land disturbing activities but then indicates “Encourage innovative and imaginative building techniques to create structures and site plans that are suited to sloped terrain.” This seems to suggest developers can develop in the steep slope areas provided they are innovative and imaginative. We think this sentence should be deleted.
- 5) 5.03.04.B.2.g – Discusses the use of blasting for sewer and water on steep slopes. It requires that blasting follow standard procedures, but we need to limit the magnitude of blasts to limit the disturbance and damage to the environment. In karst areas, we recommend limiting particle acceleration from blasts to be no more than 2 inches/sec, and that blasting be monitored by use of seismographs to confirm the particle acceleration is not exceeded.
- 6) 5.03.04.B.2.k – Recommends the use of 2 super silt fences in steep slope areas. This is inadequate. We should recommend a 25 feet vegetated buffer be required after the 2 layers of super silt fence. We should also require that storm water management designs limit the amount of storm water runoff that flows over steep slopes.
- 7) Table 5.03.03 appears to indicate active recreation within the River and Stream Corridor Resources (RSCR) is permitted. We think the recreation should be limited to passive in the RSCR. It also indicates active recreation by special exception if the use uniquely requires a site within a RSCR adjacent to steep slopes or very steep slopes and the applicant can demonstrate the proposed use is not compatible with a site that lacks RSCR or very steep slope areas. This section is worded almost as if as long as the developer can say “we have to utilize the RSCR/slopes for this active recreation and can’t put it anywhere else” that they have met the requirement. We shouldn’t have active recreation in these areas in any case. If we really want to

protect these areas, we may have to realize that not every site can be developed without damaging the RSCR or steep slopes.

- 8) Table 5.03.04-1 NERS Table. Item #2 indicates Storm Water Management (SWM) in RSCR/slope areas must be in accordance with chapter 1096 of codified code and Facilities Standards Manual (FSM). I do not have access to the SWM requirements for steep slopes in the FSM, but they were probably developed a long time ago and have not changed much. We need state of the art SWM in our RSCR/Steep slope areas. Why are we settling for standards in the FSM that were developed prior to understanding the detrimental impacts of development on our sensitive environmental areas?
- 9) Table 5.03.04-1 NERS Table. Item #8 – Siting and disturbance – Indicates land disturbance must have minimal adverse effects on water quality and erosion. This is extremely vague. The impact on water quality and erosion can be easily measured now with automatic water monitoring equipment. There should be a requirement to obtain baseline water quality information, on-going monitoring during the land disturbance, and a report with a summary of test data from a professional engineer who verifies no negative impact on water quality and erosion has occurred.
- 10) Table 5.03.04-1 NERS Table. Item 9 – Requires permeable surfaces be used. However, it has been clearly demonstrated that without maintenance, permeable surfaces clog very quickly and stop functioning soon after they are installed. In order for permeable surfaces to function over time, there must be a requirement for periodic maintenance/cleaning of the permeable surfaces with annual reports confirming the maintenance has been completed.

With sincere appreciation,



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The Goose Creek Association (GCA) appreciates the opportunity to comment on the above draft natural and environmental resource protection standards. Our organization is charged with monitoring stream water quality, proposed developments, legislation, zoning changes, and other actions that have potential impact on the environment and quality of life in the Goose Creek watershed in Fauquier and Loudoun Counties, VA. We are a nonprofit 501C3 organization with hundreds of members who share a determination to protect and preserve the natural resources, historic heritage and rural quality of life found in this beautiful part of Virginia.