

**REPORT  
of the  
GOOSE CREEK SCENIC RIVER ADVISORY COMMITTEE  
Academies of Loudoun Service Center  
CMPT-2022-0003**

The GOOSE CREEK SCENIC RIVER ADVISORY COMMITTEE (GCSRAC) received a referral of this application, has reviewed the submissions, and visited the site. The GCSRAC is charged by the Commonwealth of Virginia to advise and comment on matters that affect the natural, scenic, historic and recreational values of Goose Creek as an officially designated Scenic River. The comments that follow are made in execution of those duties.

**PHYSICAL OVERVIEW OF THE SITE**

The 20 acre site proposed for a Commission Permit and Special Exception is located on Gulick Mill Road on the rear portion of the 119 acre Academies of Loudoun school site. It is located in the Goose Creek Reservoir Protection Overlay District. The submitted plat shows natural drains on the property which flow to Goose Creek. There are wetlands on the site.

The parcel proximate to Goose Creek by about  $\frac{3}{4}$  of a mile and is currently undisturbed. Only low density residential development, forests, and fields lie between the site and Goose Creek and together form a continuous viewshed.

**FOCUS OF THE GCSRAC**

The GCSRAC has determined for its purposes that the site has an impact on Goose Creek. It is in an Overlay District designed to protect the waters of the creek. Further, in its undisturbed state it contributes substantively to the scenic and ecologic vitality of the Goose Creek corridor. **The proposals by the School Board will introduce hazardous substances that are harmful to the health of the waters of the creek and surrounding vegetation. Further, removing and disturbing the existing natural resources of the site will erode the ecological vitality of the corridor.**

**RESERVOIR OVERLAY DISTRICT CONCERNS**

The School Board proposal is for a high-traffic industrially-intense facility to occupy and replace a tract that the GCSRAC finds, from historic aerial photography, to have been in a natural state for over 100 years. The proposed improvements would introduce road treatments (salt, sand, similar materials) to be stored on the site. Additionally, a small engine repair plant is planned. This would bring motor oil and a host of repair and maintenance associated chemicals to be used and stored on the site. The vehicles to be stored on the site include trucks, snowplows, salt spreaders, mowers and trailers among others. There will be equipment washing on the site.

The GCSRAC finds that it is inevitable that these products will enter the soil, directly or through runoff. This process runs counter to the purpose of the overlay district and will be harmful to the aquifer, the corridor environment, and ultimately the waters of the creek. The proposal says, vaguely and in general, that remedial measures will be taken. The proposed plat identifies potential storm water management/best management practice sites, but their use and efficacy is not detailed or outlined. The committee questions whether adequate studies have been performed and examined.

### **LOSS OF ECOSYSTEM VITAL TO CREEK CORRIDOR**

The GCSRAC notes that the site is a mature hardwood forest supporting a forested wetland ecosystem. The soils in the vicinity are mapped as hydric, which along with the hydric vegetation and the general hydrology signify a wetland. Inasmuch as the proposal by the applicant discloses a few aspects of the general ecology, the effects of the proposal should be studied further before the current environmental system is erased and replaced by the heavy industrial improvements. It does not serve the creek corridor when a portion of its larger environment this is “carved out” for the purposes the proposal lays out. The present systems are dynamic, and the anticipated uses and development will act cancerously to what remains.

There will be substantial loss of old growth and aged tree canopy. The committee considers the canopy in and near the corridor vital to the maintenance of the general healthy ecology, and wildlife and wildlife pathways. Trees and wildlife are important to maintaining what is left of the Goose Creek ecosystem and what can be enjoyed by the citizenry. The applicant cites the 2019 comprehensive plan in support of its expansion to this site. The GCSRAC cites the same plan for its concerns for the preservation of open space, natural areas, and old growth forests. Under the applicant’s plans the forested area would be permanently lost, after over a century of standing and growing.

Wildlife in the area would suffer a substantial negative setback due to the proposed operations. Noise and light alone will drive many species from the area, and the potential for hydric infiltration threatens lesser species in the chain, all having a negative ripple effect.

### **NECESSITY OF THE IMPROVEMENTS**

The GCSRAC is aware of the county’s and school board’s need for maintenance facilities; it is axiomatic. That said, the government currently operates many facilities across the county and the committee’s close reading of the proposal finds that the overall justification is one of desire and not one of necessity. Put differently, the GCSRAC opines that approval of the application amounts to a sacrifice of vital pristine parcel of land for one goal only: convenience. This goal does not evenly balance the citizenry’s need and desire for open space (a limited resource) with its needs for maintenance of roads and facilities, for which there are already many sites. In short, whatever can be done on this site can already be done on another of many sites currently in operation.

## CONCLUSIONS AND FINAL REMARKS

The GCSRAC finds the proposal to be inconsistent with protecting the Goose Creek Scenic River corridor in many regards as noted above. Further, the GCSRAC questions the need for improving the site, especially at the detriment to the creek.

**Staff is urged to consider these observations and review the proposal more closely for its detrimental aspects.**

The GCSRAC reserves the right to make further comments and is also open to consultation with the Applicant and other parties to the re-zoning.

*Unanimously approved on September 6, 2022 at a special meeting of the Goose Creek Scenic River Advisory Committee, and respectfully submitted for consideration this September 25, 2022.*

Benjamin Winn, Chairman  
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