



County of Fairfax, Virginia

To protect and enrich the quality of life for the people, neighborhoods and diverse communities of Fairfax County

May 7, 2020

Avi Sareen
4455 Brookfield Corporate Drive, Suite 100
Chantilly, Virginia 20151

Subject: Langley Forest, Section 4, lot 6; 6630 Holland Street; Tax Map Number: 021-2-02-0006, Dranesville District

Reference: Water Quality Impact Assessment # 129-WQ-001-2

Dear Mr. Sareen:

The referenced Water Quality Impact Assessment (WQIA) has been **disapproved**. Please review and revise the Water Quality Impact Assessment (WQIA) and address the following:

General

1. Address disruptions, reductions, or increases in the supply of water to wetlands, streams, or other surface waters shown / identified, address ground water recharge.
2. Provide the % of the site disturbed since the exception in 2004, break down the disturbance prior to the present owner's purchase, that area disturbed as a result of the violation, and that to be disturbed with the proposed remediation.
3. General location and type of all significant onsite plant material; specific location and type of all trees, shrubs, or groundcovers to be removed is shown on the plan; Page 3; Paragraph B1, clarify any plant material to be removed. Show on sheet 4.

Sheet 1

4. 118-3-2(e) Show the flow to conserved open space on the BMP exhibit, Sheet 1.

Sheet 4

5. The following information is missing from sheet 4 (ZO 9-011):
 - i. Boundaries of entire property, with bearings and distances of the perimeter property lines.
 - ii. Show all minimum yards, and the distances from existing structures to the lot line.
 - iii. Delineation of the existing centerline of all streets abutting the property, including dimensions from the existing centerline to the edge of the pavement and to the edge of the right-of-way.
 - iv. The approximate on-site and off-site areas to be served by each stormwater management facility, along with the acreage draining to each facility.



- v. A preliminary stormwater management narrative: a statement that the project is exempt for Chapter 124 and why.
- vi. Show the calculation of percent increase in impervious surface on-site and types of surfacing materials used on the plan.
- vii. Include a statement on Sheet 4 “that all selected plants are indigenous species appropriate for the riparian buffer to the extent practicable”.

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- 6. 118-3-2(a); The exception granted in 2004 for the construction of the house was deemed the minimum necessary to achieve a reasonable buildable area for a principal structure and necessary utilities. Explain why the proposed improvements are the minimum necessary and discuss any alternatives.
- 7. 118-3-2(c); Show the location of the proposed fire pit.
- 8. 118-3-2(d); Removal of impervious areas should be done with handheld equipment only.
- 9. 118-3-2(e); clarify the existing and proposed conditions:
With the approval of the exception in 2004 the site comprised:
Forest Open space = 0.62 ac; 27,007 sqft
Managed Turf = 0.15 ac; 6534 sqft
Impervious Cover = 0.18 ac; 7840 sqft

The proposed conditions:

- Forest Open space = 0.59 ac; 25,700 sqft; reduction of 1307 sqft since 2004 exception
- Managed Turf = 0.12 ac; 5227; sqft reduction 1307 sqft since 2004 exception
- Impervious Cover = 0.24 ac; 10,454 sqft; increase 2614 square feet since 2004 exception

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- 10. Show the existing vegetation on the “Existing Conditions (2019)” exhibit.
- 11. Address any invasive species; address how indigenous vegetation is preserved to the maximum extent practicable. Included an invasive species management plan (e.g., type of vegetation removed, preserved and replaced, and methods proposed) if invasive species management is an objective of this application.
- 12. Clarify any plant material to be removed and show it on Sheet 4.
- 13. Measures to re-establish the understory vegetation should be proposed; seed mix may be appropriate.

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14. In the narrative for 118-4-3(b) address the following:
 - i. The condition and type of vegetation;
 - ii. Provide details of the requested exception;
 - iii. Existing topography, soils, hydrology, and geology of the site and adjacent lands;
 - iv. Impact of the proposed development to the existing topography, soils, hydrology, and geology of the site and adjacent lands;
 - v. Nature and extent of any fill material, the duration and proposed phasing of the project;
 - vi. All requisite wetland permits from other agencies;
 - vii. Type of all vegetation to be removed;
 - viii. Location, type, characteristics, and condition of RPA features;

15. In the narrative for 118-4-3(c) address the following:
 - i. Provide a detailed justification; explain the violation and provide justification for the patio and grill and any other encroachments beyond those on the 2004 exception to remain. For items to be removed explain further the encroachment required to remove the items. Address the above in this section or state where it is addressed in the WQIA.
 - ii. 118-4-3(e) The narrative should be expanded to discuss the proposed BMPs and explain how they will be effective in preventing an increase in nonpoint source pollution.
 - iii. 118-4-3(e) The narrative should address measures for hydrogeological (the distribution and movement of water) impacts.
 - iv. 118-4-3(e) The statement “It is TNTs opinion that the current property owners should not have to mitigate for the actions of the previous owners of the property” does not belong in this section. The Water Quality Impact Assessment is a statement of fact. Statements of opinion should be restricted to the statement of justification.
 - v. 118-4-3(f) Provide additional information to support the need for the extensive patio and explain why this is needed at this time and was not needed at the time the exception for the house was granted.

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16. 118-6-6(a); Reference the section 118-6-6. In addition to the history state why the requested exception is the minimum necessary to afford relief.

17. 118-4-3(g); This section should be updated to reflect the VRRM computations; the two planter boxes with sheet flow to conserved open space.

18. State the 2004 phosphorous load and the proposed 2020 phosphorous Load; demonstrate that there is a water quality benefit.

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19. 118-6-6(b) That granting the exception will not confer any special privileges denied in similar situations. Staff do not concur that the referenced properties with RPA encroachment support this finding:

The encroachments at 900 Mackall Avenue, 839 Whann Avenue; the patios and pools in the RPA are existing non-conforming uses constructed before the RPA was established.

With the exclusion of a small part of the pathway, the improvements at 836 Mackall Avenue which would require an exception are outside the RPA; as demonstrated by the field delineation on the infill lot grading plan.

20. 118-6-6 (d) The application does not contain sufficient facts to enable staff to ascertain why the exception is not based on circumstances that are self-created and self-imposed.
21. 118-6-6(f) / 118-6-9. Consider a gravel diaphragm around the patio and treating this area as sheet flow to conserved open space.

If further assistance is desired, please contact me at 703-324-1808 or Camyllyn.Lewis@fairfaxcounty.gov.

Sincerely,



Camyllyn Lewis, PE., CFM
Senior Engineer III, North Branch
Site Development Branch (SDID)
Land Development Services (LDS)

CL/tc

cc: Shannon Curtis, Chief, Watershed Assessment Branch, Stormwater Planning Division,
Department of Public Works and Environmental Services
Shahab Baig, Chief, North Branch, SDID, LDS
Dr. Yosif Ibrahim, Senior Engineer III, North Branch, SDID, LDS
Waiver File