



Holly Meade  
Chief of Planning  
Fauquier County  
Department of Community Development  
10 Hotel Street  
Warrenton, Virginia 20186

May 16, 2017

RE: SPEX-16-006207

Dear Ms. Meade:

The Goose Creek Association<sup>1</sup> is concerned with the size and scope of the special exception applications filed by the Easton Porter Group (EPG) for development of the Blackthorne Inn property in Upperville, Virginia. This 57acre property lies within the Goose Creek watershed, an integral source of groundwater for residents of Fauquier and Loudoun counties, as well as part of the Potomac and Chesapeake Bay watersheds. The property also lies within the Unison Battlefield Historic District.

GCA endorses the Planning Commission's review comments on the proposed development and appreciates the professional review you, your staff and other agencies have provided. We strongly believe that the EPG should address all the issues and questions raised in your report, before any special exception permit is issued. In particular, the extensive use of water and alternative septic systems (ASS) should be scrutinized and tested before any development for their impact on the ground water.

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The Goose Creek Association is a tax exempt nonprofit with over 600 members in Fauquier and Loudoun Counties that is dedicated to the protection and preservation of the natural resources, open spaces, historic heritage, and rural quality of life within the Goose Creek watershed. GCA began in the early 1970s to address proposed release of effluents into the Goose Creek. Since then, we have remained vigilant in promoting the quality of life in our watershed for, without clean water, there is no life. GCA's stream monitors vigilantly have sent data on the health of our streams for over a decade to the Virginia Department of Environmental Quality, we have sponsored and supported our historic preservation districts, planted riparian buffers, commented on development efforts, and promoted conservation education. In recent months, the GCA Board has met with both Greystone neighborhood association and EPG representatives about this proposal.

We cannot simply accept EPG's assertions that there will be no impact on the watershed, as we have heard this before. Marshall is facing a groundwater crisis that is being addressed with over a million dollars of taxpayers' money, despite frequent assertions that there is plenty of water in Marshall. Fauquier and the US Army Corps of Engineers are in the midst of a multi-year study of Fauquier's aquifers. Without the results of this study and a site-specific drawdown study on the property, we simply cannot accept the developer's assertions that there will be no impact on the surrounding wells and watershed.

Further, the use of ASS raise issues of maintenance and the toxicity of dispersed outflow. These systems incur more frequent mechanical break-downs than regular septic systems, especially when used intermittently due to seasonal fluctuations of use, and do not resolve all toxic outflow when operating as intended, as nitrates and other non-biologicals can infiltrate and pollute the groundwater.

Finally, granting these special exception requests, as proposed, will create a precedent for all properties zoned as Rural Agricultural in Fauquier. Such zoning does not require or compel commercial development on the scale proposed, even for so-called agri-tourism. Granting this application could lead to similar development requests throughout the county with consequences that are not amicable to the peace and quietude of our countryside.

The size and location of the events center and other potential outdoor events are of particular concern given that they are likely to impose excessive noise, light and traffic burdens on the otherwise rural and residential community. Last November Mr. Dean Andrews asserted that the resort would work within the parameters of the 2014 special exception "license" approval. However, EPG's current application far exceeds the parameters of that approval. See Fauquier Times, "Blackthorne's new owners vow to 'minimize impact' on neighbors," November 17, 2016. The proposed size and frequency of events belie EPG's assertion. In the article, Mr. Andrews also suggests that the overnight guest accommodations would be capped at 120, not the EPG proposal's 78. EPG's subsequent assertion that the number of overnight residents will be fixed as proposed at 78 rather than lead to more lodging development in the future must be scrutinized. Whatever the amount of accommodations and events that are permitted, perhaps the EPG could put the property under an easement that sets the development at that level to ensure no further development by EPG or another owner occurs in the future.

The nearby Salamander Resort began as a proposed @ 70 room inn and morphed, for commercial reasons, into the size and scale it is today (168 rooms). EPG's proposed events center size and the frequency of events requested are similar to those of the Salamander Resort and more than the Airlie Resort, both of which are located on hundreds of acres, not 57, with specially built water reserve facilities. In addition, other nearby resorts and event centers are being planned on a massive scale that will only bring more competition for accommodations and events. See Banbury Cross Reserve on Rt.50 east of Middleburg in Loudoun County.



If Fauquier County's Comprehensive Plan for Rural Agricultural zoning is to have any meaning, our Planning Commissioners and Supervisors must address whether and where developments of this size are appropriate and credible. Promises of over one hundred full-time jobs in a seasonal business and bounteous tax revenues must be weighed against declining adjacent property values and reality.

EPG's proposal seems to be preliminary, and they have not yet responded to staff comments, so GCA will continue to monitor EPG's application for responses to the concerns raised here, by neighbors and by the Department of Community Development. EPG is a high quality developer and professes to be a good steward of the environment that has produced beautiful properties elsewhere. Therefore, we hope that EPG will amend its proposal to address these concerns and produce a more appropriate plan for our watershed and community.

Sincerely yours,

A handwritten signature in black ink, reading "Lori Keenan McGuinness". The signature is fluid and cursive, with the first name "Lori" being more prominent and the last name "McGuinness" written in a continuous script.

Lori Keenan McGuinness  
Chair, Fauquier County, on behalf of the  
Goose Creek Association