



Loudoun Board of Supervisors  
Loudoun County Government Center  
1 Harrison St SE # 5  
Leesburg, VA 20175

RE: ZMAP - 2020-0005 Goose Creek Overlook

Dear Honorable Board of Supervisors:

The Goose Creek Association (GCA)<sup>1</sup> opposes the Goose Creek Overlook rezoning application because it is contrary to the letter and spirit of the 2019 General Plan that provide for the protection and preservation of Loudoun's unique natural resources.

Chapter 3 of the 2019 General Plan includes many pages of policies, strategies, and actions pertaining to protection of the County's precious natural and environmental resources, with the Goose Creek specifically named as one worth protecting. Surely the property adjacent to the Goose Creek that is designated for the Goose Creek Overlook is also to be protected.

- Goose Creek has been a designated state scenic river that is impaired where the development would occur. The impaired streams map exhibit at 3-40 of the General Plan clearly shows that the Goose Creek is an impaired stream at this point. Why add to its impairment with a dense development and its inevitable run-off and litter near the water intake site for Leesburg? How does this development contribute to the scenery or health of the Goose Creek?

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<sup>1</sup> The Goose Creek Association (GCA) appreciates the opportunity to comment on the above project proposal. 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.

- Chapter 3-14 of the 2019 General Plan requires the county to “Identify those properties that are not conducive to development due to sensitive environmental, cultural, and historical characteristics, and promote their preservation through various public and private programs” (such as the Open Space Preservation Program, conservation easements, etc.) As proposed, the Goose Creek Overlook project is totally contrary to this imperative. It destroys wetlands, and impinges on floodplains and no build zones, while lacking adequate public open spaces despite repeated requests from planners. It is simply the wrong development for this sensitive area that should be preserved, not densely developed.
- Chapter 3-16 of the 2019 General Plan requires the county to “prioritize protection of the following priority open space areas through conservation easements acquired by the County or others, participation in the Open Space Preservation Program, development design, and other means: “Areas adjacent to the Potomac, Catocin, Bull Run, Goose Creek, and Broad Run floodplains to protect water quality.” Has the county even considered purchasing this property or attempted to seek a conservation minded buyer rather than destroy this uniquely beautiful property? Has the devastation across the Goose Creek where the True North data center is now pleading to eliminate its height proffer caused this county to simply surrender its General Plan commitments to the Goose Creek?
- The developer’s proffers simply do not go far enough to protect the Goose Creek and this sensitive area. As the planners noted, the project still impinges on no build zones and flood plains. It also fails to provide the requisite civic and active-recreation space required by the Comprehensive Plan.
- The developer has proffered removal of the remains of a historic building dating to 1810-1830 that has been identified in a phase 1 archeological survey of the property. How does dismantling a historic building for relocation and restoration at county expense elsewhere preserve this site’s history? Loudoun County was formed in 1757 from a portion of Fairfax County, which was formed in 1742 from a portion of Prince William County, which in turn was formed from a portion of Stafford County in 1731. In 1728, when the property was still a part of Stafford County, the first pioneer settlement in what is now Loudoun County was established by Jacob Binks, Isaac Lasswell and James Rice, Scotch Irish settlers from the Virginia tidewater region, “on both sides of Goose Creek beginning about three miles above the mouth of Secoline Branch.”<sup>2</sup> The historic structure dated to 1810-1830 identified in the phase 1 archeological survey is 2.78 miles upstream from the mouth of Sycolin Creek and the southern border of the property is 2.9 miles from the mouth of Sycolin.<sup>3</sup> Further

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<sup>2</sup> See Fairfax Harrison, LANDMARKS OF OLD PRICE WILLIAM, A Study of Origins in Northern Virginia (2<sup>nd</sup> Reprint Ed. 1987, pp. 265-266.

<sup>3</sup> These measurements were obtained using the measurement tool on the county’s Weblogis online mapping system, <https://logis.loudoun.gov/weblogis/>. Also, the county’s Weblogis map of “Original Land Grants of Loudoun County, VA,” <https://loudoungis.maps.arcgis.com/apps/MapTools/index.html?appid=d3c4ba1031564f919ca28c9bb5a48350>, shows an 1728 land grant to Issac Lasswell for 198 acres immediately across Goose Creek from the proposed development, thereby placing the first settlement at this point on Goose Creek.

research is required, but it is highly likely that the Goose Creek Overlook property is **at or near the place where Loudoun County had its beginnings**. As the oldest continuously occupied site in Loudoun County, the property may also contain the graves of enslaved plantation workers associated with the structure circa 1810-1830 identified in the Phase I archeological survey. If federal transportation funds will be utilized in any part for the county road and bridge work required to accommodate the proposed project, then an evaluation of historic resources under Section 106 of the National Historic Preservation Act may be required before the project can be approved. Legal requirements aside, it seems a real shame to destroy what is potentially one of the most important archeological sites in the county.

- Under the General Plan, the permitted density for this site is up to four dwelling units per acre. With the addition of affordable dwelling units, the density of this environmentally sensitive site is pushed to the max, with over four dwelling units per acre. If bonus density is to be granted anywhere to encourage development of affordable dwelling units, it should not be on the banks of Goose Creek, a natural resource the General Plan has prioritized for protection as open space.
- While the developer has made several desirable proffers, building a trail or park can be accomplished without destroying a key natural and historic site on Goose Creek. There is a tremendous need for additional parkland in the county as the population continues to grow, especially in the Ashburn area where this development is proposed. The Goose Creek Overlook site would be much better suited to development as a public park than a dense housing development.

There are plenty of other desirable areas in Loudoun County for a dense residential development like that envisioned for the Goose Creek Overlook. Such dense developments should be near public transportation and commercial centers, not here, and on top of the Goose Creek. The costs to the public, in terms of the unique natural and historic resources that the 2019 General Plan recognized, are simply too great to accommodate this project.

Sincerely yours,



Paul Lawrence  
Chair, Loudoun County



Lori K. McGuinness  
Chair, Fauquier County