



July 10, 2020

Mayor and City Council  
Fairfax City Hall  
10455 Armstrong Street  
Fairfax, VA 22030

Dear Mayor Meyer and Members of the City Council:

The Audubon Naturalist Society (ANS) would like to provide you with our perspective and broader context regarding the June 2020 Multi-Parameter Stream Quality Assessment Northfax Property report prepared by Apex Companies, LLC for Northfax JV LLC.

We have reviewed this report and listened to the discussions about this report at the June 22<sup>nd</sup> Planning Commission. We have several concerns with the interpretation of the data, both within this report and as discussed at the meeting.

But first let me state a point of agreement: this stream is *not* pristine. Surrounded as it is by development, no one could reasonably have this expectation. This is where our agreement ends.

What we raised previously as an issue, and continue to have issue with, stemmed from Mr. Rosenberger's statement on May 13<sup>th</sup>, 2020<sup>1</sup> that: "...based on studies that Apex Companies... has done, the [North Fork] stream is not in good condition. There's no observed fish or other macroinvertebrates indicative of good water quality in that stream area." And he continued to compare it to Van Dyck Stream Park which "...contains fish, birds, mammals, and other macroinvertebrates that do constitute a sustainable ecosystem within that stream valley."

We believe this is not only a false statement, but also one lacking context given:

1. In a May 27<sup>th</sup>, 2020 follow up call with Mr. Rosenberger, Mr. Brooks, Ms. Fraser, and Mr. Ruck, no study was able to be referenced to support the quote for either the North Fork or Van Dyck Park.
  - In fact, the Apex study that is now being used to support Mr. Rosenberger's statement mentions a June 1<sup>st</sup>, 2020 site visit, further undermining our confidence in the applicant's claims given that their report was done only after the comment.

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<sup>1</sup> 5 hr 14 min: [https://fairfax.granicus.com/MediaPlayer.php?view\\_id=11&clip\\_id=2252&meta\\_id=80418](https://fairfax.granicus.com/MediaPlayer.php?view_id=11&clip_id=2252&meta_id=80418)

2. No sufficient comparison of the A1 section of the North Fork with Van Dyck Park has been presented by the applicant showing these two aquatic ecosystems as vastly different (as expressed on May 13<sup>th</sup>), and in fact our investigations show them to be similar.<sup>2</sup>
3. No broader context has been provided as to how the North Fork stacks up in comparison to other headwater streams in the City of Fairfax.

In fact, the Apex report *supports* our assertions that the stream *does* contain macroinvertebrates indicative of better water quality than presented by Mr. Rosenberger. The Audubon Naturalist Society has been doing water quality monitoring and macroinvertebrate reporting for 27 years in the metro region. Cathy Wiss, our MD/DC Water Quality Monitoring Program Coordinator read Apex's report and discussed her perspective on it with me.

Even in its current state, the North Fork of Accotink Creek harbors an abundance of life. The macroinvertebrates listed in the Apex report, **notably *Neophylax*** (case-making caddisfly) **and *Serratella*** (mayfly), paint a different picture to our trained staff than the one presented to you by Apex. In Montgomery County, Maryland – a comparable jurisdiction where ANS has been studying stream ecology for decades – we find these taxa in healthier streams in less-developed areas. We have not found them in urban or suburban streams, even in low-density neighborhoods such as the ones to the north and west of this stream.

To suggest that the presence of these macroinvertebrates in low numbers indicates poor stream health is nothing short of a misrepresentation of the facts. Most stream macroinvertebrates in this area are insect larvae which emerge as adults in the spring and summer and *leave the water*. This seasonality means that one would expect to find them in the stream in greatest abundance *in mid-spring* – not June, when this survey was conducted (for this reason, in our monitoring program and in most government monitoring programs, the most important data-collection window is April). In addition, the younger forms (eggs and early instars, which would be increasingly present in the summer months) are too small to be caught in nets of the type used for this survey. The timing of the stream survey is absolutely key.

While the dominant taxa are *Chironomidae* (midge) and *Hydropsychidae* (net-spinning caddisfly), that is to be expected in habitats in the DC metro area. These macroinvertebrates, along with the *Physidae* (snails), are commonly found *year-round*. Conversely, shredders, a functional feeding group highlighted as *missing* from this report, are *not expected to be found* in June. They are typically found in autumn, winter, and early spring. These taxa include several stonefly families often found in the same streams as *Neophylax* and *Serratella* in Montgomery County. They time their lives to eat leaves that fall into the stream in autumn. By June, the leaves are gone, and the stoneflies that eat them have emerged.

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<sup>2</sup> P. 8-9 go into more detail: <http://cleanstreams.anshome.org/wp-content/uploads/2020/05/20200617-ANS-NorthfaxWest-and-realted-hearings.pdf>

The Apex study did not find predators either, which is not unusual even when they *are* present. A stream supports far fewer predators than the prey they consume. Furthermore, some predators like damselflies prefer specific habitats, such as root wads on the side of the stream rather than in the middle where Apex sampled. It is highly likely that this stream harbors damselflies because an adult was seen flying above the stream when we visited on May 17<sup>th</sup>, 2020.

In short, if the stream were truly as impaired as Apex claims, these animals would not have been found there at all. If the City had an ecologist familiar with the habitats and conditions of urban streams, this broader view could have been presented more clearly. And in fact, if the arguments being made in the Apex report have encouraged the City to culvert this stream, then the precedent that sets for other streams of this quality is dire. As the City encompasses a significant portion of the headwaters of Accotink Creek, as urban pressures increase, more streams will be at risk. As documented in our June 17<sup>th</sup> comments<sup>3</sup>, other locales in our region understand that piping streams is an antiquated approach to development and are seeking to daylight (un-pipe) streams.

At the Audubon Naturalist Society, we pride ourselves on our commitment to science and data. We also understand that data can be shown out of context, thus leading to misleading conclusions. That appears to be the case in this report.

**ANS continues to urge the City of Fairfax to deny, or further delay a decision on, the Northfax West application.** We urge the City to strive to preserve the healthier urban stream headwaters it has, such as the A1 section of the North Fork of Accotink Creek, instead of trading them away for man-made green infrastructure and stream restorations. Green infrastructure and stream restorations should be used to help *minimize* impacts to our urban streams, not as a *replacement* for them.

Sincerely,



Renee Grebe  
Northern Virginia Conservation Advocate  
Audubon Naturalist Society

Cc:

Eliza Cava, Director of Conservation, ANS  
Robert Stalzer, City Manager, City of Fairfax

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<sup>3</sup> P. 16-17: <http://cleanstreams.anshome.org/wp-content/uploads/2020/05/20200617-ANS-NorthfaxWest-and-realted-hearings.pdf>

Brooke Hardin, Director of Community Development and Planning, City of Fairfax  
David Summers, Director of Public Works, City of Fairfax  
Jason Sutphin, Division Chief, Community Development, City of Fairfax  
Paul Nabti, Planning Division Chief, Community Development & Planning, City of Fairfax  
Wendy Block Sanford, Transportation Director, City of Fairfax  
Christina Alexander, Transportation Capital Projects Manager, City of Fairfax  
Satoshi Eto, Stormwater Resource Engineer, City of Fairfax  
Stefanie Kupka, Sustainability Coordinator, City of Fairfax  
Michelle Coleman, Zoning Administrator/Deputy Director, City of Fairfax  
Albert Frederick, Planner III, Community Development & Planning, City of Fairfax  
Lynne Strobel, Walsh, Colucci, Lubeley & Walsh, P.C.