

**Accotink Gravity Sewer Improvements**  
**Friends of Accotink Creek, Comment Response**

Q. The Friends of Accotink Creek take an interest in all projects within our watershed. Please add steward@accotink.org to the stakeholder notification email list for this project.

A. The contact information has been added to our list.

Q. Along most of the project route, two or three sewer lines run parallel. Will more than one line be expanded, or just one?

A. The project recommended alternative is to add one (1) additional pipe to increase overall capacity. The existing sewer in the vicinity will remain in use, although sections of the 21-inch line near the intersection of Route 50 and Nutley will be removed and consolidated with the new sewer.

Q. Will any of these parallel lines be consolidated at any point?

A. Sections of the 21-inch line will be removed and consolidated with the new sewer near the intersection of Route 50 and Nutley.

Q. Will the number of manholes remain the same? Will their locations change?

A. New manholes will be installed along the length of new sewer to enable access and cleaning of the sewer. There are **no anticipated changes to the number/location** of the existing manholes.

Q. This is a floodplain subject to regular inundation. Will new manholes be sealed or elevated? How high? How wide at the base?

A. New manholes located withing floodplain will be provided with **watertight lids** to protect from flooding. Manhole widths are **5' diameter** standard manholes used by Fairfax. Exceptions are the junction structures which consolidate flows from the existing and new sewer. These structures vary by location and are detailed in the design drawings.

Q. Will draining and pumping of Hunters Branch be required at any point?

A. Creek bypass specifics are unknown at present. Controls for the new pipe crossing will be subject to the Contractors means and methods and will be coordinated with the erosion and sediment control certified inspectors to ensure conformance with the contract and permits for the project.

**Interpretation – We will do what we want how we want.**

**Comment - I count three crossings of Hunters Branch.**

Q. Much (but not all) of the route of the sewer line has been maintained clear of trees. Would we expect this cleared strip to be widened?

A. Tree clearing in the existing easement may be completed as necessary for cured in place lining of the existing sewer being rehabilitated. Tree clearing will be required for the construction of the new sewer in a new easement.

Q. Will a tree survey be conducted tabulating where and how many trees would be removed?

A. Yes, a tree survey has been completed. This information is included in the 95% design plans which have been forwarded for information.

Q. Would additional tree clearing for equipment staging areas be proposed beyond the confines of the sewer line itself?

A. Yes, additional tree clearing is anticipated in the vicinity of the junction structure (JS-1) at the confluence of Hunters Branch and Accotink Creek due to the scope of construction activities in that area. Additional tree clearing for staging, other than that needed for new pipe construction, is not anticipated for other areas in the project.

**? – Why are no other staging areas needed?**

**Comment - Significant additional clearing is shown on the plan, for several new access points.**

Q. What form would replanting take? Seed mix only? Trees and shrubs? Native species only? Measures to preclude early colonization by invasives?

A. The project approach to restoration has been based on discussions and **coordination with the FCPA and the Stormwater Planning division**. The approach is based on the use of native species and conducted such that **invasives are removed** and actions taken to minimize their spread into restored areas. The approach includes a mix of trees and shrubs and use of seed mixes. The final plan continues to evolve in our design plans and specifications and may be further refined as permit review comments are received.

Q. What long term monitoring would be in place to assess watershed and habitat impacts related to the project?

A. Project restoration and monitoring will be completed to assure that restoration has been properly established and is in conformance with permit requirements. Any additional restoration or monitoring requirements that are imposed by the permit review process will be incorporated into the project.

**Interpretation – There will be no monitoring beyond the end of the project.**

Q. What format, frequency, and length of time?

A. This depends on what is required by the permits necessary for the work. The permits have not yet been issued.

Q. What are the criteria for watershed and habitat impacts?

A. This depends on what is required by the permits necessary for the work. The permits have not yet been issued.

Interpretation – The absolute minimum imposed on us by law.

Q. How can arrangements be made for volunteer rescue of native plants in the path of the project and for their return after construction?

A. This work can be coordinated with Fairfax County during the construction phase of the project. Coordination can occur with the County project manager. Please provide more information about your capacity (how many plants can you manage), advance notice (how far in advance do you need to schedule), objectives (what type of plants are you interested in rescuing) to help the County prepare.

Reply – Frankly, our capacity is minimal. It is unlikely more than a dozen participants will come forward. There is no minimum for advance notice, but longer lead times allow more participation. The types of plants are any native species that face destruction by the project. We would be interested in opportunities to return plants to the project area after work is complete.

Q. In this streamside corridor, coordination with the Stormwater Planning Division can be expected to yield opportunities for avoidance of negative environmental impacts and for synergy and cost savings by incorporating County watershed enhancement goals into this project.

A. The project has been coordinated with DPWES Stormwater Planning to minimize impacts. Unfortunately, a larger watershed restoration for the project area is not possible.

? – Not possible or can't be bothered?

Q. With the beginning and end segments of the project in parks, coordination with Fairfax County Park Authority is called for to minimize disruption to citizen use of parks and, again, can be expected to yield opportunities for overall cost avoidance by prevention of redundant disruptions of the same areas.

A. Coordination with the FCPA was initiated during design. Adjustment to the project alignment and limitations on construction to certain times of year to minimize disturbance to users to the greatest extent possible have been incorporated.

Q. Much of the project route is in the Town of Vienna, which we understand also independently operates some of the adjoining sewer lines. Again, coordination will certainly yield opportunities for collaboration in achieving mutual sewer maintenance needs and watershed enhancement goals at reduced financial and environmental cost.

A. The project has been coordinated with the Town of Vienna and coordination of necessary permits and approvals continues. This project does not require any modification of the Town's sanitary sewer.

Q. We found rather concerning this slide included in the May 24, 2022, public presentation. The implication that parks and forested areas are not valued resources, but rather are "undeveloped" targets suitable for clearcutting, is distressing.

A. The reference to "undeveloped" was intended to be in reference to disturbance areas and possible relocation of existing structures and utilities.

**Interpretation – And the 95% plan shows exactly the indifference we feared.**

Q. No mention of stream, park, or other environmental concerns seemed to be found in the same presentation.

A. Streams, parks, and other environmental factors have been considered in the new sewer design.

**Interpretation – Yes, as obstacles to be pushed through.**

**Nottoway Park to Tapawingo Road segment:**

Two sewer lines converge in Nottoway Park and run parallel as far as Tapawingo Road. The area is divided between a narrow forested riparian corridor and areas of mowed lawn including sections of park pedestrian trails.

A. Acknowledged.

Q. Will closure of park facilities (service road, open play field, and trails (including trail along Courthouse Road) be required? If so, how long?

A. Park closures have been coordinated with FCPA to occur between December 1 and March 31 at Nottoway Park and between August 1 and March 15 at Accotink Stream Valley Park to avoid high use periods.

Q. The current sewer line runs through a wildlife corridor in a narrow forest strip between a mowed area/community gardens and Moorefield Park. Will tree clearing be required for the new sewer line installation?

A. The new sewer alignment has been coordinated with both the FCPA and the Town of Vienna to minimize impacts in this area. A small section of trees will be removed to facilitate construction. See response(s) above regarding restoration in FCPA areas. A similar approach will be used for the Town of Vienna area.

Q. What will be the impact on community garden plots, including gardener vehicular access to the area?

A. Temporary impacts to the community garden plots are expected. See response(s) above regarding time of year restrictions to minimize impacts to users.

Q. Is sewer maintenance coordinated with the Town of Vienna for possible cost saving collaborations?

A. The project has been coordinated with Vienna. See the response above regarding no impact on Vienna sewer operations.

Q. Much of the project will be directly on the banks of Hunters Branch, with at least one crossing. Coordination with the Park Authority, Stormwater Planning Division, and Town of Vienna to minimize negative impacts to the stream and identify opportunities for environmental enhancements are imperative.

A. See responses above regarding project coordination.

### **Tapawingo Road to Virginia Center Blvd segment:**

Three sewer lines run roughly parallel alongside and cross Hunters Branch between Tapawingo Road and Virginia Center Blvd. The area is divided between a narrow forested riparian corridor and areas of mowed lawn entirely within the common area of the Townes of Moorefield community.

A. Acknowledged.

Q. Is sewer maintenance coordinated with the Town of Vienna for possible cost saving collaborations?

A. See responses above regarding coordination with Vienna.

Q. Much of the project will be directly on the banks of Hunters Branch, with at least one crossing. Coordination with the Town of Vienna to minimize negative impacts to the stream and identify opportunities for environmental enhancements are imperative.

A. The new sewer is located within the Tapawingo Rd and Nutley St roadways, no impacts to Hunters Branch stream banks are anticipated. Crossings of Hunters Branch will occur at existing roadway culverts and will be done using a tunneled approach for the crossings.

Q. The Town of Vienna Hunters Branch Stream Restoration Phase II project is planned on this section of Hunters Branch. Can the two projects be coordinated for cost savings and avoidance of redundant disturbance of the same areas?

A. Our project disturbance is within the roadway and is outside the Hunters Branch Stream Restoration Phase II limits.

Q. Opportunities exist for replacing some mowed areas with reforestation.

A. As our project disturbance is limited to the vicinity of our pipe construction, there will be little opportunity to replace mowed areas with trees as tree roots above our new sewer adversely impact the long-term operation and maintenance of the County sanitary sewer.

**Comment – This implies a policy of more active mowing than is currently the case for most County sanitary sewer lines, with corresponding loss of wooded habitat.**

Q. A magnificent specimen of the native vine Yellow Passionflower, *passiflora lutea*, grows here. It should be singled out for preservation.

A. Please provide the location of the Yellow Passionflower on a markup of the 95% plans for consideration.

**Response – The yellow Passiflora is outside the project limits.**

### **Virginia Center Blvd to Saintsbury Drive segment:**

One sewer line runs beside Nutley Pond and townhouses between Virginia Center Blvd. and Saintsbury Dr. The area is largely covered with asphalt or areas of mowed lawn. There is little environmental concern on this section. The damage was done decades ago when the unfortunate decision was made to put Hunters Branch in a quarter mile long culvert beneath I-66.

A. Acknowledged

Q. The currently ongoing Nutley Pond Restoration Project may not be directly in the path of the project, but coordination with Stormwater Management Division will ensure minimal disturbance of the project features and possible mutually beneficial collaboration.

A. Our understanding is the Nutley Pond Restoration Project is complete. Pipe alignment has been carefully coordinated to minimize impacts to the upland area from the pond.

**Saintsbury Drive to Route 29 segment:**

Two sewer lines run parallel alongside Hunter Branch between Saintsbury Drive and Route 29. The area is forested riparian corridor featuring areas on the FWS National Wetlands Inventory.

A. Acknowledged.

**Comment – This segment does not follow the existing alignment, so more clearing.**

Q. This area is divided among three private parcels. Coordination with Stormwater Planning Division may provide opportunities to incorporate elements of stream restoration that might otherwise be impracticable on these private parcels.

A. Please see responses to Stormwater Division coordination above. Stream impacts and restoration will be completed, as required, for the new sewer construction.

Q. Much of the project will be adjacent to the banks of Hunters Branch. Minimizing negative impacts to the stream will be imperative.

A. Erosion and sediment controls during construction have been added to the project to minimize disturbance. The plans are currently under review through the Joint Permit application process and any additional provisions noted during this review will be added to the project.

**Interpretation – We will do the minimum imposed on us by law.**

**Route 29 to Route 50 segment:**

Two sewer lines run parallel alongside Hunter Branch, with at least two stream crossings, between Route 29 and Route 50.

A. Acknowledged.

Q. The area is forested riparian corridor featuring extended wetland areas (although none on the FWS National Wetlands Inventory) containing several vernal pools.

A. Plans have been updated with wetland locations in the vicinity of our proposed construction activities and the alignment has attempted to minimize impacts. The plans are currently under review through the Joint Permit application process and any additional mitigation provisions noted during this review will be added to the project.

Q. A stand of the uncommon native wetland wildflower White Turtlehead, *Chelone glabra*, grows here. It should be singled out for preservation.

A. A markup of the wildflower location on the 95% plans is requested to determine preservation options.

Q. This area is divided among five private parcels. Coordination with Stormwater Planning Division may provide opportunities to incorporate elements of stream restoration that might otherwise be impracticable on these private parcels.

A. See response(s) above regarding coordination with the Stormwater Division.

Q. Much of the project will be adjacent to the banks of Hunters Branch. Minimizing negative impacts to the stream will be imperative.

A. Much of the new sewer alignment in this vicinity is located east of the banks of Hunters Branch. There are some impacts in this vicinity to provide the necessary access to complete the pipe rehabilitation and construction needed.

**Comment – This segment does not follow the existing alignment, so involves more clearing.**

#### **Route 50 to Accotink Creek segment:**

Two sewer lines run parallel alongside Hunter Branch between Route 50 and Accotink Creek. This area is within the Accotink Creek Stream Valley Park.

A. Acknowledged.

Q. This is also the location of a Park Authority Invasive Management Area project led by volunteers.

A. Removal and monitoring of invasive species while new plantings are being reestablished is currently included in the project. Coordination with FCPA is continuing with the review of the 95% plans in this area. Volunteer coordination will be discussed further with FCPA.

**Comment – The project will devastate the existing IMA project area. The response does not acknowledge the loss.**

Q. Directly adjacent to the sewer lines, the Accotink Stream Valley Trail connects Rt. 50 to the Cross County Trail.

A. Acknowledged.

Q. This segment is the most environmentally sensitive along the project route.

A. The pipe alignment was adjusted to minimize impacts and allow for the re-establishment of wetlands within the limits-of-disturbance and above the new sewer. The Joint Permit application and review will evaluate our proposed approach to the disturbance and restoration of these wetlands. Any additional provisions recommended during this review will be incorporated into the project.

Comment – This is difficult to comprehend. Minimized impacts would not mean clearing a 50' wide strip, plus a staging area. Could the new pipe not be put under the trail? Could the new pipe not simply replace the pipe being abandoned? "Re-establishment of wetlands" seems far-fetched.

Q. The area is forested riparian corridor featuring areas on the FWS National Wetlands Inventory and containing numerous vernal pools providing amphibian breeding habitat.

A. During our consulting engineer's site investigations (June 2021 and June-July 2023) no vernal pools were identified. In the event they are found within the limits-of-disturbance during another time of year, a vernal pool restoration detail has been included in the project design drawings.

Comment – If you don't want to see something, you won't. The word "vernal" means spring – summertime searches are not effective.

Q. The most outstanding of these pools is located directly in the path of construction, providing habitat for salamanders, frogs, crayfish, snails, amphipods, & copepods.

A. See response above.

Questions:

Q. Will work extend beyond junction 074?

A. See plans provided for anticipated work near Junction 074.

Comment – The plans indicate no.

Q. At the southern end of the project, an eroded ephemeral channel runs from junction 074 to Hunters Branch. Can this channel be restored as part of the project (working with Stormwater Planning Division)?

A. The project has been designed to avoid impacts to the historical mill race east of MH 48-4-074. This issue has been reviewed and coordinated with the FCPA.

Interpretation – Don't bother us.

Q. How long can we expect the trail will be closed?

A. It is estimated the work will take 3 months to complete. See response(s) above indicating the time of year restrictions for this work to complete these activities during lower usage months.

Comment – Three months for the whole project seems surprising and perhaps indicative of a rushed job that will disregard environmental impacts.

Q. Rather than spot repairs to the trail upon project completion, the project should incorporate resurfacing the whole trail from Route 50 to the Cross County Trail, thereby reducing the need for further disturbance of the area and saving taxpayer funds.

A. The project will protect the existing trail with a mulch access path and widen the access with a reinforced grass paver to maintain the aesthetic of the area. Restoration discussions are ongoing with the FCPA.



Comment – Why not save taxpayer funds by completing the trail resurfacing, which was delayed by FCPA because of this project?

Interpretation – “Maintain the aesthetic” is empty verbiage. The project will replace wooded habitat with concrete pavers, entirely for the convenience of vehicles.

Q. There are three benches along this stretch of the trail. Will they be affected? If so, would they be replaced or are they superfluous? If replaced to current ADA standards with a concrete pad, how will the additional impervious surface be compensated?

A. Two benches are called out to be protected and the southern bench will be removed and replaced during construction. The bench being replaced will be coordinated further with FCPA to determine what improvements may be needed.

Q. Would tree clearing be required beyond the limits of the existing mowed areas beside the trail?

A. Yes – see limit-of-disturbance drawings.

Comment – The limit of disturbance (including the existing paved Accotink Trail) will be 50’ wide.

Q. Would additional tree clearing for an equipment staging area be proposed?

A. Due to the extent of construction activities to complete work near junction structure 074, an area has been identified for staging the improvements. The area identified is for this area only and is not meant to provide staging for the entire project.

Comment – The staging area would be about 75’ x 200’.

Q. Would replanting be limited to native species typical of the surrounding habitat? Would the Park Authority Natural Resource Branch be a partner in replanting selection and methods?

A. Replanting along the route has been coordinated with FCPA and includes appropriate native species specific to the floodplain environment per Fairfax County Seeding Guidelines (LDS Tech Bulletin #22-04).

Comment - LDS Tech Bulletin #22-04 does not seem to be mentioned in the 95% plan (but the plan is not searchable, so it may be in there somewhere). 22-04 requires species native to Fairfax County, but higher standards are needed to accomplish anything resembling restoration of the existing habitat.

<https://www.fairfaxcounty.gov/landdevelopment/sites/landdevelopment/files/assets/documents/22-04-fairfax-county-seeding-guidelines.pdf>

Q. What can be done to preserve adjacent wetlands and vernal pools from direct construction impacts or negative alteration of hydrology?

A. The proposed pipe alignment has been optimized to limit disturbance to wetland areas to the greatest extent possible. Most impacts to wetlands will be temporary during construction, with the areas restored to original contours using native materials. Some conversion impacts to wetlands were required to assure that there will be long term access to the sewerage system to conduct routine maintenance.

Comment – “optimized to limit disturbance” seems to mean the pipe is in a straight line. “Restored to original contours” again seems far-fetched.

Q. What long term monitoring would be in place to assess watershed and habitat impacts related to the project?

A. None are anticipated extending beyond the expectations defined for the contractor during and post construction.

Interpretation – We will congratulate ourselves and then wash our hands of any habitat impacts.

Q. In particular, what steps can be taken to preserve or even enhance the vernal pool in the direct path? This pool provides an exceptional opportunity for public education, in addition to its inherent wildlife value.

A. The proposed alignment, where practicable, is located adjacent to the existing infrastructure. A detail has been included to reestablish a vernal pool should this be necessary. The impacts to vernal pools and public education concepts will be discussed further with FCPA.

Comment – It appears the existing vernal pool will be obliterated. Digging a replacement pool is better than nothing. The existence of any vernal pools along the route is still unacknowledged.