



703-356-0551  
Fax 703-821-4275  
TTY 711

E-mail: [dranesville@fairfaxcounty.gov](mailto:dranesville@fairfaxcounty.gov)  
Web site: [www.fairfaxcounty.gov/dranesville](http://www.fairfaxcounty.gov/dranesville)

COMMONWEALTH OF VIRGINIA  
**COUNTY OF FAIRFAX**

McLean Governmental Center  
1437 Balls Hill Road  
McLean, VA 22101



**JOHN W. FOUST**  
**DRANESVILLE DISTRICT SUPERVISOR**

October 2, 2019

Stephen C. Brich, P.E.  
Commissioner  
Virginia Department of Transportation  
1401 East Broad Street  
Richmond, VA 23219

Re: Permit No. 947-134496; Washington Gas Light Company Appeal of Permit Denial

Dear Commissioner Brich:

As elected representatives of the Pimmit Hills community, we write in support of the Virginia Department of Transportation's (VDOT) denial of a land use permit by Washington Gas Light Company (Washington Gas) to install a 24-inch gas transmission pipeline along the proposed Fisher and Cherri Streets route (the Neighborhood Route). For the reasons explained below, we endorse VDOT's Local District determination that Washington Gas should pursue the Route 7 and Magarity Road route (the Corridor Route) and that it should be constructed contemporaneously with the upcoming project to widen Route 7 from the Capital Beltway to I-66.

We appreciate the proactive effort by Washington Gas to upgrade and replace its aging infrastructure. Phase 6, which is the subject of the appeal, is part of a larger project to replace one of the oldest transmission pipelines in the Washington Gas system. The western portion of their project runs entirely in the Route 7 right-of-way from Bishop Gates Way in Herndon to Tyco Road in Tysons and was closely coordinated with VDOT as part of the Route 7 widening project from Reston Avenue to Jarrett Valley Drive. The use of VDOT's rights of way by public utilities is a privilege extended to the utility owners by VDOT in an attempt to best serve the public interest and the simultaneous construction of the two projects limits the disruption that would have resulted from constructing the projects sequentially.

Most of the eastern portion of the transmission pipeline project winds its way almost exclusively through retail and office business areas in Tysons. However, the proposed Neighborhood Route would unnecessarily cut through the middle of Pimmit Hills, a well-established, vibrant and diverse neighborhood consisting of 1640 homes, many of which date back to the 1950's.

Because of its proximity to Tysons, the Pimmit Hills neighborhood is experiencing significant redevelopment in the form of tear downs and rebuilds. We expect that many of the nearly 200 homes along the route will be rebuilt in the future, and that a significant amount of work will be required to tie into utilities in the right-of-way. In many cases these utilities are near the depth of

the proposed transmission pipeline. The risk of damage to such a significant piece of infrastructure is too high for the residents along the route, for the region and Washington Gas, itself.

The community, our offices, and VDOT have asked Washington Gas to instead install the transmission pipeline coincident with the on-going efforts to widen Route 7 from the Beltway to I-66. Completion of the County's Route 7 project is expected to take several years and be finished by 2030. Not only does this route have more right-of-way in which to construct the transmission pipeline but the largely commercial nature of the corridor makes it less likely that an inexperienced homeowner or contractor will damage the transmission pipeline.

At no time during our many meetings with Washington Gas nor in its appeal, does the company unequivocally state that it is not feasible to construct within the Corridor Route. Instead, they mention "logistical, economic, and engineering hurdles" in their appeal. Working within the Corridor Route right-of-way may be more challenging, but the benefits associated with coordinating the two projects while avoiding unacceptable impacts to an established residential community outweigh the inconvenience or cost cited by Washington Gas.

Before closing, we would like to provide context for some of the statements and conclusions included in the Washington Gas appeal documents. As you consider the appeal, we ask that you also consider the following:

1. Washington Gas started the discussion on the need for this pipeline connection at least as early as 2012! From the very beginning they were told that the Neighborhood Route was unacceptable. At this point, if the pipeline is not completed as soon as they would like, they have themselves to blame for more than 7 years of delay.
2. Amazingly, Washington Gas claims that "in its Denial, the District Office overstates the level of opposition by the community, elected officials and Fairfax County staff." Although Washington Gas argues that there is limited opposition to the Neighborhood Route, the fact is that the Pimmit Hills Citizens Association (which represents over 1600 homes) passed a resolution in opposition and the Association's Pipeline Committee has been very active in presenting the community's opposition. In addition, in 2015, over 50 individual homeowners signed a petition to the State Corporation Commission in opposition. Further County Transportation staff have expressed opposition to the Neighborhood Route and Washington Gas is well aware of our opposition. (Supervisor Foust notes that for at least seven years they have known of the strong opposition of the County Supervisor who represents Pimmit Hills.)
3. Washington Gas now claims they conducted a thorough route analysis prior to applying for a land use permit. However, Washington Gas previously told residents that they had not performed such an analysis of the Corridor Route and, in any event, we are not aware of any such analysis having been produced.
4. Washington Gas states that it estimates project completion for 2023 if the Neighborhood Route is used. It is important to note that they do not say that the project must be completed by then. Although their story has changed frequently over the past seven years, we understand that Washington Gas will have 15 years to complete the project after the pending rules are implemented. If the regulations were enacted next year, the upgrade would not be required until 2035, a date that easily falls within the completion date for the Route 7 widening project.

5. To suggest lack of community opposition, Washington Gas claims the Pimmit Hills community supported construction of a regulator station at the Pimmit Hills Center. This is misleading. Washington Gas had initially proposed that the station be built at the site of the historic Pimmit Hills Barn but met very substantial opposition. Washington Gas argued that, regardless of whether they followed the Neighborhood Route or the Corridor Route, they needed to install a regulator in Pimmit Hills (or outside of Pimmit Hills and then run another pipeline through Pimmit Hills to connect to the regulator). The community worked collaboratively with Washington Gas to meet this need by not opposing installation at the Pimmit Hills Center.
6. Washington Gas accurately states that the Fairfax County Board of Supervisors has identified Tysons to undergo some of the most robust growth in the area. What Washington Gas does not state, however, is that the Fairfax County Board of Supervisor has also said that every effort must be made to mitigate the impact of that growth on established neighborhoods like Pimmit Hills. This can only be done by implementing the Corridor Route.

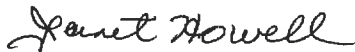
Coordinating utility and transportation projects has been a best practice for VDOT that has served to minimize disruptions to the traveling public and residents. Approving this appeal would result in two significant projects that would likely be constructed sequentially and result in disruptions to the traveling public and nearby residents for many years. The risks and impacts associated with the Neighborhood Route are great and the benefits of pursuing the Corridor Route are obvious. Therefore, we encourage you to uphold the denial of the land use permit for that route.

Thank you for your consideration.

Sincerely,



John W. Foust  
Fairfax County Board of Supervisors, Dranesville District



Janet Howell  
Senate of Virginia, 32<sup>nd</sup> District



Marcus Simon  
Virginia House of Delegates, 53<sup>rd</sup> District