

WATERSHED MANAGEMENT COMMENTS

PROJECT: PW Digital Gateway

PROJECT#: CPA2021-00004

FROM: Benjamin Eib, Assistant Chief of Watershed Management Branch

REVIEWERS: Julia Flanagan (Arborist), Clay Morris (Environmental Engineer)

DATE: December 10, 2021 (1st submission)

REQUEST: CPA to create a Digital Corridor

COMMENTS:

I. Anticipated Impacts on Goals, Policies and Action Strategies of the Comprehensive Plan Natural Resources

1.1 The entirety of the 2,132 acre CPA proposed is currently planned to remain in the Rural Area and Environmental Resource (AE & ER) The proposed Tech Flex (T/F) Long Range Land Use classification would allow a dramatic change to the land use with associate far-reaching impact to natural resources.

Major impacts would include loss of extensive tracts of forest land, dramatic increases in impervious area, impact to numerous intermittent and perennial streams, steep slopes with highly erodible soils, wildlife habitat (including habitat for rare, threatened and endangered species) and potential impacts to wetlands.

Numerous Comprehensive Plan Policies and Action Strategies speak to protecting and preserving these valuable natural resources (See DES-12.1, 12.2, 12.3 and 12.5; EN-1.3 and 1.7; EN-4.8; EN-5.1, 5.3, 5.17, 5.19; EN-6.10; EN-9.10; EN-10; DES-9.4; EN-3.7 and 3.13) Thus far development of data centers has resulted in mass grading that does not preserve forests, steep slopes or other sensitive features, resulting in little preservation of natural resources outside of areas protected by state or federal law.

Therefore, staff recommends the Comprehensive Plan remain unchanged.

1.2 Impacts to the Little Bull Run RPA would be affected by the proposed widening of Pageland Lane to 4 lanes associated with the data center development.

1.3 The proposed data centers would also allow encroachments into the RPAs for utilities, as such uses are considered either exempt or permitted within the RPA.

1.4 On the “Environmental Conditions Map” (Sheet 7) show (ZO 32-700.21.6; EN-1.2, Reference Manual):

- a. Soils overlay
- b. Steep slopes of 15% and slopes of 25% and greater
- c. Show the outline of all land qualifying as ER, as ER is defined in the Comprehensive Plan, Long Range Land Use Plan (See Page LU-31).

- d. Use a larger, readable scale. Perhaps nothing smaller than 1:400. We do not need to see all of the battlefield property.

1.5 With regard to Community Design, the proposed land use change would bring about extensive and incompatible changes both within the proposed CPA and with all abutting land uses. The development of existing data centers has demonstrated that extensive mass grading and the nearly wholesale clearing and flattening of large parcels is the norm. Replacement of forests and fields with numerous buildings, each the size of several football fields, will greatly alter the community appearance. In order to lessen these visual and environmentally detrimental effects, staff would recommend implementation of major preservation, buffering and site design strategies should this change take place.

Staff recommends any change to the Comp. Plan Land use designations be accompanied by such measures as the following:

- a. Make the highest priority the establishment of substantial protected open space (Natural Open Space and Environmental Resource Corridors) around wetlands; extending along perennial and intermittent streams along with adjacent bluffs and steep slopes with highly erodible soils; and for rare, threatened and endangered species.
- b. Restoration of natural resources and habitats such as native forest and meadows for inclusion in protected Natural Open Space, where such resources have previously been removed. (DES-13)
- c. Perimeter buffering of existing natural and historical resources beyond what current standards require. For example, a minimum 200' wide buffer of preserved forest where it exists with supplemental planting as needed along the borders with the Manassas National Battlefield Park, Conway Robinson State Forest, and other lands protect for cultural resources.
- d. Buffering of roadways beyond the current standards with a minimum of 200' buffer. This should include prioritizing preservation of forests and native meadows where they exist and restoration of these land features where they do not. (DES-4)
- e. Higher mitigation standards for impacts to wetlands and RPAs.
- f. Improvement of degraded streams by the rezoning applicants (EN-7.2)

II. Site Specific Concerns:

None at this time.

III. Conflicts with Minimum Development Standards:

N/A