



County of Fairfax, Virginia

To protect and enrich the quality of life for the people, neighborhoods and diverse communities of Fairfax County

February 23, 2022

Rebecca Horner, Deputy County Executive
Prince William County Planning Office
5 County Complex Court
Prince William County, Virginia 22192-9201

Dear Ms. Horner: *Rebecca*

Thank you for the opportunity to comment on the 1st Submission of the Comprehensive Plan Amendment (CPA #2021-00004) for the Prince William Digital Gateway Corridor. As we understand it, the Comprehensive Plan Amendment proposes to amend both the Comprehensive Plan text and the Long-Range Land Use Map classifications on approximately 2,133 acres of land located in western Prince William County along Pageland Lane from Agricultural or Estate (AE) and Environmental Resource (ER) to Technology/Flex (T/F) and Environmental Resource. Additionally, this land would be removed from the Rural Area Boundary related to public utilities. If the proposed Comprehensive Plan Amendment is approved, it would make available, subject to future rezoning actions, a significant amount of additional land for new data center facilities (with ancillary offices). It is our further understanding that data centers are a “Targeted Industry” commercial tax base use in Prince William County and that no expansion of the Data Center Opportunity Zone Overlay District is proposed as part of this CPA.

The responses in this memo have been coordinated among the Fairfax County Departments of Transportation (FCDOT), Public Works and Environmental Services (DPWES) and Planning and Development (DPD).

Land Use

Currently, the property subject to this CPA is primarily zoned A-1 (minimum 10 acre parcels), in addition to land zoned SR-5 (minimum 5 acre parcels). Existing parcels range in size from one acre to 100 acres and are not currently in an area of Prince William County that is served by public sewer and water. The proposed CPA may result in the ultimate development of up to approximately 27.6 million square feet of data center uses within the area covered by the CPA. To serve the proposed uses, Pageland Lane would be upgraded to a four-lane divided road with pedestrian accommodations on the east side, and public sewer and water would be extended into this area.



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Fairfax County encourages land use patterns of a compatible use and intensity that minimize adverse impacts on transportation and public facilities that do not result in environmental, visual or other impacts created by potentially incompatible uses. To that end, Fairfax County concentrates its highest level of development intensity in development centers, which also helps to ensure environmentally sensitive areas are not impacted.

Critical to Fairfax County is the protection of the Occoquan Watershed. In the early 1980s, Fairfax County took significant planning and zoning actions to protect this vital source of our collective drinking water. One of those measures is that the western portion of Fairfax County, adjacent to the Prince William County border and closest to the proposed CPA, has a rural character and contains parcels that are planned and zoned for very low-density residential, forest, farmland, or public parkland uses to protect the Occoquan Reservoir. Most of this area is outside of Fairfax County's Approved Sewer Service Area and is served by private wells and on-site sewage disposal systems. These planning principles help to protect environmentally sensitive features, wildlife, and the Bull Run Watershed, which ultimately drains to the Occoquan Reservoir, as discussed in greater detail below.

The proposed Plan Amendment to permit the development of over 27 million square feet of data center uses on over 2,100 acres of land that is planned currently in a manner that is compatible with Fairfax County's Plan, and the proposal to expand public sewer and water to serve the proposed data centers would not be compatible with the critical need to protect the Occoquan Reservoir.

This CPA proposes an average floor area ratio (FAR) of 0.30; however, individual developments may develop above the 0.30 FAR provided that the average is maintained throughout the parcels subject to this CPA. Additionally, the CPA states that buildings would have heights that do not exceed three floors, although building heights near the Manassas Battlefield Park and Heritage Hunt Community would range from 1-2 floors. Similar data center applications in Fairfax County have proposed floor area ratios ranging from 0.23 to 0.92 and building heights ranging from 67-feet to 102-feet (which anticipate 2 to 3 floors). Due to concerns regarding compatible development to surrounding low-density residential neighborhoods and impacts to environmentally sensitive features (as further discussed below), Fairfax County recommends that any CPA include a maximum FAR for individual sites and a maximum building height, as opposed to a maximum number of floors, since the individual floors of these facilities could vary greatly.

Water Resources Protection and Stormwater Management/Best Management Practices

Both the western portion of Fairfax County adjacent to the Prince William County border and the area covered by the proposed CPA drain to the Occoquan Reservoir. The Occoquan Watershed contains some of the most extensive remaining wildlife habitat and rural landscape in the area. Both Fairfax County and Prince William County have designated expansive areas of the Occoquan Watershed for agricultural or low-density residential uses to protect this valuable resource. As stated previously, continued protection of this watershed is of paramount concern to

Fairfax County. To that end, we have an overarching concern about the proposal to permit higher density development within the larger Occoquan Watershed due to cumulative impacts on the Reservoir which provides drinking water to a large portion of Northern Virginia.

The Fairfax County Comprehensive Plan contains guidance regarding land use within the Occoquan Watershed. Much of the area is zoned to the Residential-Conservation (R-C) District, in which very low-density uses are anticipated to protect the Occoquan Reservoir. This very low-density development (5 acre lots) and undisturbed contiguous open space are identified in the Comprehensive Plan as key practices for the protection of the Occoquan Reservoir. When used in conjunction with non-structural stormwater management facilities, the water that ultimately enters the Occoquan Reservoir can be managed in a way that positively contributes to the quality of water in the reservoir. Low densities, limited expansion of public infrastructure (public water and sewer) and development designs that encourage preservation of water features and other sensitive lands contribute to water quality protection within the Occoquan Watershed; create corridors of open space for wildlife; and provide recreational opportunities. Additionally, there are several Agricultural and Forestal Districts located in this area of Fairfax County, which further protects the Occoquan Reservoir by maintaining the rural character of the area. In addition to providing water quality benefits, the types of development that we have planned preserve valuable habitat, accommodate wildlife movement, and allow the county to concentrate public facilities, transportation and public utilities in those areas planned for higher intensity development. Finally, Fairfax County has designated this area of the County as a Water Supply Protection Overlay District (WSPOD) where additional water quality control measures are required. Specifically, the projected post-developed phosphorous pollutant load needs to be reduced by at least 50%.

The proposed CPA in an area that is currently identified as a Rural Area and Environmental Resource, would not be consistent with the policies of Fairfax County or the similar current policies of Prince William County and will add a significant amount of impervious cover to an environmentally sensitive area of Prince William County. With a greater amount of impervious surface, more runoff and pollutants reach adjacent streams. Higher levels of runoff from increased imperviousness accelerate stream channel erosion causing increased sedimentation. Deicing salt applied to roads and parking lots is the primary source of chloride in streams. In areas where we expect the conversion of forested and open space to impervious cover, Fairfax County recommends stormwater quality and quantity controls above the minimum requirements to include Low Impact Development (LID) techniques, where feasible, that reduce stormwater runoff volumes and peak flows and increase groundwater recharge and would encourage Prince William County to do the same.

Resource Protection Area (RPA), Floodplain and Wetlands

Floodplain, Resource Protection Areas and likely wetlands associated with Bull Run exist along the Fairfax County/Prince William County border near the proposed development. Since this is a proposal for a CPA, detailed development information is not available at this stage; however, the proposal to add 27.6 million square feet of development and associated parking lots and

infrastructure are anticipated to have impacts on these environmentally sensitive features. Fairfax County recommends that any new development avoid significant ecological resources to the maximum extent feasible and encourages the preservation of these environmentally sensitive features. One method by which this is done in Fairfax County is through the designation and preservation of Environmental Quality Corridors (EQCs) which, as defined in the Policy Plan Element of Fairfax County's Comprehensive Plan, includes all 100-year floodplains, areas of 15% or greater slopes adjacent to the floodplain, and all associated wetlands. Areas of EQCs include Bull Run, Cub Run, and their branches, which flow into the Occoquan Reservoir, and which provide both recreation opportunities and enhanced water quality. A similar approach is recommended for Prince William County to provide enhanced buffers around environmentally sensitive features. This would help protect and preserve habitat quality, protect streams, reduce pollutants from entering the water, and provide a connected segment of open space to facilitate the movement of wildlife in the area. Encroachments should be minimized to the greatest extent feasible. If encroachment into any wetlands is anticipated, any mitigation/compensation of wetlands should occur as close to the area of impact as possible.

Landscaping and Tree Canopy

The proposed CPA would result in the removal of significant mature, forested areas, which would be replaced with highly impervious uses. This could result in fragmented areas of tree preservation, leaving existing vegetation vulnerable to impacts or loss, and loss of safe habitat for plants and wildlife. The western portion of Fairfax County, adjacent to the Prince William County border, contains one of the largest areas of wildlife habitat in the County and this habitat area is augmented by Prince William County's current Plan recommendations.

Due to the size of the proposed data centers and associated grading and tree removal, Fairfax County recommends that any future developments prioritize tree preservation over new plantings to the greatest extent feasible to provide screening, protect viewsheds, and provide habitat corridors. It is further suggested that new development include an urban forestry program and be designed in a manner that retains and restores meaningful amounts of tree cover, consistent with planned land use and good silvicultural practices. Good quality vegetation should be preserved and enhanced and lost vegetation restored through replanting.

Grading should also be minimized to preserve the highest number of existing trees, as well as impacts to the critical root zone of trees to be preserved. If new trees are proposed, high quality, native trees and shrubs and natural landscaping techniques should be used to reduce the use of fertilizers and maintenance and assist with improving air quality. Focus should also be placed on energy-conscious landscaping efforts such as the planting of trees to provide shading of buildings and parking lots during the summer months. Any invasive species should be removed and areas re-forested with native species and shrubs. If approved, the proposed CPA plan could benefit from including additional information and details about areas proposed for development and proposed for preservation to further analyze impacts to adjacent properties and environmental resources.

Green Building and EV Charging Spaces

Fairfax County encourages that any new non-residential development be designed and constructed to use energy and water resources efficiently and to minimize short- and long-term negative impacts on the environment and building occupants. This would include energy conservation, water conservation, and other green building practices in the design and construction of the proposed development, as well as other environmentally friendly approaches, such as bird-friendly glass, non-transparent glass and high reflectivity roofing materials, green roofs, and green walls.

Noise and Lighting

The cumulative impact of 27.6 million square feet of data center uses in a concentrated area will result in additional noise and lighting impacts over the currently planned low density residential uses. Fairfax County encourages the submission of a noise study with any development proposal that includes information regarding generator noise levels; testing procedures (including frequency, duration, & time-of-day); noise baffles; efficacy of noise baffles; on-site mechanical equipment; distances to residential uses; and expected noise impact on adjacent residential uses, as well as proposed mitigation measures. Fairfax County also encourages that any future development minimize light emissions by limiting lighting to a Correlated Color Temperature (CCT) of 3000 Kelvin or less and the use of full cut-off fixtures.

Heritage Resources

Fairfax County Heritage Resources staff supports Prince William County Heritage Resources staff in their recommendations dated December 14, 2021, including creation of 200-foot perimeter buffer on project area land to mitigate visual impacts of development on surrounding properties; completion of a Phase I cultural resource study; completion of a Phase II evaluation of potentially significant sites; preservation in place of sites determined eligible for the NRHP; and preservation of cemeteries in place.

The nearest Fairfax County Inventory of Historic Sites property, the Manassas Gap Railroad Independent Line, is adjacent to the border of Fairfax County and Prince William County; this asset should be physically and visually protected from any future development.

Transportation

The FCDOT reviewed the proposed CPA and, based on review of the reports provided, found that the report is based on correct trip generation codes and reasonable modeling process. While there would be a moderate number of additional trips going to or from Fairfax County on roadways such as I-66 and US 29 under the 2040 Build + mitigation scenario, staff does not anticipate significant impacts. Finally, the proposed mitigation (widening Pageland Lane to four lanes) is reasonable.

Conclusion

As discussed in this letter, Fairfax County staff has significant concerns regarding the impacts that will accrue from adoption of this CPA and encourages Prince William County to reconsider the proposal. It is our understanding that the CPA was originally proposed to apply to approximately 800 acres. If approved, we would encourage that it apply to that lesser acreage and that the proposed CPA could benefit from the inclusion of additional guidance about such things as environmental protection, tree preservation and building heights as elaborated on more fully in this letter.

It should also be noted that Fairfax County staff has provided these comments for the purpose of identifying issues that we believe should be resolved and that these comments represent staff analysis and do not reflect the opinion of the Fairfax County Board of Supervisors.

Thank you in advance for consideration of our comments. If you have any questions about the comments, please contact me.

Sincerely,



Barbara Byron, Director
Department of Planning and Development

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cc: Board of Supervisors

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