



*Promoting and protecting the natural resources, rural economy,
history and beauty of the Virginia Piedmont*

March 30, 2022

Prince William County Planning Commissioners; Patty Kuntz, Chair at-Large

c/o Prince William County Planning Office 5 County Complex Court, Suite 210 Prince William, VA
22192

Re: Draft Land Use Chapter of the Comprehensive Plan

Dear Planning Commissioners,

I am writing on behalf of the Piedmont Environmental Council, a non-profit land conservation and land use advocacy group. Our mission is to protect the natural resources, rural economy, and historic resources of the Piedmont while supporting development of sustainable communities that are well connected and inclusive where people want to live, work, and play. I would like to share a few comments on the proposed Land Use Chapter of the Pathway to 2040 Comprehensive Plan.

PEC believes in the importance of sound land use policy to encourage compact, fiscally-sustainable growth as well as the protection of natural, agricultural and scenic resources. While the Pathway to 2040 Comprehensive Plan appears to aspire to these same principles, we believe a number of policies proposed by the Plan fall short of these aspirations.

One such policy is the proposed increase in residential density in the County's Rural Area. The proposed Agricultural and Forestal Designation to replace the Rural Area designation would double the allowable density for roughly 75,000 acres in the Rural Area and the introduction of new rural place types would further increase the density allowances on approximately 10,200 acres in the Rural Area. Although PEC supports localities identifying areas to accommodate future growth, we do not believe either of these changes will promote balanced, compact growth in the County. Rather, these changes encourage residential densities that are largely consistent with suburban development. If approved, they could open the Rural Crescent to suburban sprawl, requiring the extension of services and infrastructure at a significant cost to the County. The changes proposed in the land use chapter pose an existential threat to the Rural Crescent urban growth boundary, which has played a major role in concentrating development near services and protecting water quality, agricultural and forested lands and national parks in the County since 1998. The County should not move forward with such a large re-designation of rural land without first knowing its fiscal and environmental implications for County residents and existing communities.

Another policy is the designation of approximately 1,800 acres of land in the Rural Area along Rt. 28 in Nokesville for Industrial Employment use. We believe that this is an arbitrary land use designation, unfounded by community outreach or data, that would further encroach into the rural area and significantly increase traffic, particularly truck traffic, on Rt. 28. The surrounding area is rural and Rt. 28 is currently only 2 lanes with plans to remain 2 lanes in Fauquier County. To support the traffic generated by the envisioned development, costly road improvements would be needed not only in Prince William but also adjacent Fauquier County. In addition, some adjacent property owners are on wells and conducting farming operations that might be impacted by certain industrial activities/uses. More information about traffic implications and impacts to adjacent property owners is needed before including such a substantial land use change in Prince William's Comprehensive Plan. A drastic land use change such as this would significantly alter the rural character of the area, impacting the Rt. 28 corridor, surrounding residents, and the agricultural economy of Nokesville. Outreach specifically to Fauquier County regarding traffic implications and the Nokesville community regarding land use implications should be done prior to adopting such a major land use change.

We believe it is important that the County seek out opportunities to retain and build new affordable housing in places that have good access to employment opportunities, services, and public transportation. Although the plan recognizes this need in various places and incorporates it into the strategies and policies, there seems to be a disconnect between what is written and the land use changes proposed. Extending County services and infrastructure to new rural areas and with densities of 1 house per 5 acres or even quarter acre lots in rural hamlets is not a solution for affordable housing. If housing is going to be built, affordable housing should be included, but it is not a sustainable location for growth and does not provide easy access to needed employment, services, or transportation. There are ample opportunities for the County to expand its affordable housing stock within the development area. Opportunities such as transit-connected activity centers or mixed use centers designated on the long-range land use map are ideal locations to offer additional density to developers in exchange for higher percentages of affordable housing. In addition, there are infill and redevelopment opportunities which, done well, could tremendously enhance and benefit surrounding communities.

Anticipated Board of Supervisors decisions for the Comprehensive Plan Update, the Data Center Overlay District, and the Prince William Digital Gateway comprehensive plan amendment are all slated for May 2022. If the Comprehensive Plan is in fact the overarching document guiding the County's growth, we believe any decisions regarding the Data Center Overlay Zone and the Digital Gateway should be delayed until the comprehensive plan update is complete. The County is further deviating from its planning process by considering a high number of landowner requests for changes to their long range land use designation, many of which are to accommodate data center development. By moving forward on all of these proposals in tandem, in an effort to accommodate the speculative interests of developers, the County is undermining its own planning process and eroding the public's trust in it.

It is not too late for the County to engage in a well-thought-out comprehensive planning process that all of its residents can endorse. Before adopting the comprehensive plan update, we urge you to:

- Reevaluate the draft future land use plan and the fiscal / economic benefit of extending growth into the rural area.
- Prioritize public investments in our existing neighborhoods and commercial areas such as expanding sidewalk connections, improving lighting, implementing traffic-calming measures, and improving stormwater management, among others.
- Evaluate the traffic implications of the proposed growth and the costs associated with needed improvements. Be forthright about future water and sewer in the plan and provide cost estimates for expansions associated with projected growth.
- Conduct an analysis of traffic impacts, infrastructure expansion required, and potential land use conflicts of the Nokesville Industrial Employment Area.
- Conduct targeted outreach to the Nokesville community regarding the proposed Industrial Employment Area designation.
- Discuss the implications of the Nokesville Industrial Employment Area designation with Fauquier County staff and elected officials.

Thank you for considering our comments and feel free to contact me with any questions or concerns.

Sincerely,

Kevin Kask
Land Use Coordinator
Piedmont Environmental Council
kkask@pecva.org
540-347-2334 ext. 7046