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: May 5, 2022 (3rd submission)

REQUEST: CPA to create a Digital Corridor

COMMENTS:

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

Natural Resources

3.1   (Repeat Comment) 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 associated 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 potential impacts to 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 typical 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.

3.2   Watershed supports the statement of other County Agencies that this application would benefit from information obtained through completion the study of impacts of data centers outlined in the Board Resolution #21-327, dated May 18, 2021.

3.3   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.

Should this change take place, in order to lessen these environmentally and visually detrimental effects, staff recommends implementation of major preservation, buffering and

site design strategies. Accordingly, any change to the Comp. Plan Land use designations should include Policies and Action Strategies incorporated into Comprehensive Plan and then into Zoning Ordinance amendments. See the goals staff outlines below in Comment 3.4. Staff has preliminarily mapped most of these areas discussed.

3.4   The Applicant's response to staff's 2nd submission comments states that their proposed Plan "…seeks to harmonize and integrate high tech employment uses with environmental sustainability, in a manner which creates a new standard for commercial development."

Staff agrees that a new environmental standard is needed should the application move forward (See EN-1.3, EN-1.5, EN-5.1, EN-5.3, EN-5.17, EN-5.19, EN-6.10). Many of their proposed policies speak to this, however staff's experience in applying Comprehensive Plan policies that don't specify a quantifiable goal is that policies such as minimizing forest fragmentation and preserving mature forests and wildlife habitat are not being achieved. What is needed is Policy language that includes identifying minimum area goals and graphics identifying key features described below. In light of, this staff recommends the following Comprehensive Plan Policy language for this CPA:

a. Establish Protected Open Space that prioritizes the establishment of a substantial amount of public and private protected open space. Protected Open Space should consist of two types of open space aimed specifically at preserving and restoring natural landforms: Natural Open Space as defined in the Zoning Ordinance, and Restored Open Space. Restored Open Space consists of previously disturbed areas that will be restored to native forests, wetlands or meadows during development and subsequently protected from further disturbance. Protected Open Space areas should include:
    1. Environmental Resource areas which include FEMA floodplain, and FEMA flood Hazard, natural 100-year floodplains as defined by the DCSM, Chesapeake Bay RPAs, wetlands, 25% or greater slopes, areas with 15% or greater slopes in conjunction with soils with severe limitations, areas of marine clays, public water supply sources, and critically erodible shorelines and streambanks.
    2. A minimum 500' wide undisturbed corridor on each side of all perennial streams. These areas would pick up many of the Environmental Resources in #1, above. (This item relates to the Applicants "Primary RPA, Floodplain, Creeks, Streams" language which speaks to making a priority of buffer existing RPA's beyond what current standards require.)
    3. Restored natural landforms such as forests, native meadows and wetlands. Most of these area also would likely be within the 500' wide corridors in #1, above.
    4. Wildlife Corridors a minimum of 500' in width. This may include the expanded RPA areas as well as non-RPA areas.
b. Restore previously disturbed areas to native forest, wetland and/or meadow habitats and designate as Protected Open Space.
c. Create wildlife corridors along perennial streams and within existing woodland areas along the western boundary from Artemus Road to Lick Branch.

     d. Require generalized development plans, MZPs and SUPs, to establish 30% Natural Open Space (NOS), as NOS is defined in the Zoning Ordinance. NOS should emphasize the preservation of existing forest cover and other natural resources where they exist and restoration of forest cover where it does not exist. The Applicant has proposed 20% NOS.

     e. Seek commitments from applicants to provide funding for restoration of forest cover through existing County programs.

     f. 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 environmental and cultural resources.

     g. 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)

     h. Preserve specimen trees within and adjacent to Protected Open Space.

3.5   (Repeat Comment) 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.

3.6   (Repeat Comment) 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.

3.7   (Repeat Comment) No updated Environmental Conditions Map was provided with this submission. 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.

II. Site Specific Concerns:
    None at this time.

III. Conflicts with Minimum Development Standards:
    N/A