Print Date: February 25, 2022



CURRENT PLANNING CASE INFORMATION

Plan/Case Information:

Case Type: Comprehensive Plan Amendment

Plan/Case#: CPA2021-00004

Plan/Case Name: PW Digital Gateway
Plan/Case Address: 12816 THORNTON DR

CATHARPIN VA 20143

Location: The expanded study area includes both sides of Pageland

Lane and is generally bounded by Sudley Road to the north

and Route 29 to the south.

Request: A Comprehensive Plan Amendment to change the Long

Range Land Use from AE, Agricultural or Estate and ER, Environmental Resource to Technology / Flex (T/F) with a T-3 Transect create a Digital Corridor and include related

impacts on supporting infrastructure and consider

alternative comparable land use designation options that meet the needs of the Applicant and the priorities of the Prince William Board of County Supervisors. The Prince William Board of County Supervisors approved a an amendment to this initiation enhancing the study area to include the entire corridor between Route 29 and Sudley Road in order to review in a holistic manner (traffic, land use, and environmental concerns), look carefully at the areas directly abutting Conway Robinson Memorial State Forest and the Manassas National Battlefield Park, and coordinate the review with the open space corridor concepts of the rural area (native plant buffering and

sustainability) to preserve as much of the area as possible. The parcels are zoned A-1, Agricultural and designated AE, Agriculture or Estate and ER, Environmental Resource in the Comprehensive Plan. Some or all parcels in this application and Study Area are located in the Rural Area Boundary and Airport Safety, Domestic Fowl, 100-year Flood Hazard, and Resources Protection Area Overlay Districts. Additionally, some parcels are located in Cemetery

Preservation Areas (Phillips, Civil War Graves) and the

Preservation Areas (Phillips, Civil War Graves) and the

Silver Lake Dam inundation Zone.

Submission #: 2

Submission Acceptance

Date: January 19, 2022

Applicant Information:

Applicant/Agent: MARY ANN GHADBAN

6389 PAGELAND LN GAINESVILLE, VA 20155

Phone: E-mail:

Case Planner Information:

Case Planner: BARRETT, BRYCE

Phone: 703-792-8007 **E-mail:** BBarrett@pwcgov.org



Plan Comments Report Community Development Manager Review Completed

| Plan/Case #: | CPA2021-00004 | Date: |
|-----------------------|--|---------------------|
| Plan/Case Name: | PW Digital Gateway | |
| Plan Case Address: | 6385 PAGELAND LN GAINESVILLE VA 20155 | |
| Reviewer: | Barrett, Bryce | |
| | 703-792-8007 | BBarrett@pwcgov.org |

The following items/issues were noted on your case. Please review and provide a letter responding to these comments, along with revised plans and proffers. Please be advised that staff might not identify all of the issues that arise during the case review and public hearing process. In addition, the solutions to the issues identified in this correction report might not be the only solutions, but are thought to be the most desirable solutions as determined by staff. Please note that any modifications will result in further review by pertinent agencies and staff, and could result in changes to the analysis and/or any recommendations.

Section I - Comments that Require Applicant's Response:

SEE CASE PLANNER COMMENTS

Section II - Questions/General Information:



Plan Comments Report Conway Robinson Park

Reviewed w/Comments

| Plan/Case #: | CPA2021-00004 | Date: 02/16/2022 |
|-----------------------|--|---------------------------------|
| Plan/Case Name: | PW Digital Gateway | |
| Plan Case Address: | 6385 PAGELAND LN GAINESVILLE VA 20155 | |
| Reviewer: | Parmelee, Sarah | |
| | 434-220-9085 | sarah.parmelee@dof.virginia.gov |

The following items/issues were noted on your case. Please review and provide a letter responding to these comments, along with revised plans and proffers. Please be advised that staff might not identify all of the issues that arise during the case review and public hearing process. In addition, the solutions to the issues identified in this correction report might not be the only solutions, but are thought to be the most desirable solutions as determined by staff. Please note that any modifications will result in further review by pertinent agencies and staff, and could result in changes to the analysis and/or any recommendations.

Section I - Comments that Require Applicant's Response:

SEE ATTACHED

Section II - Questions/General Information:

SEE ATTACHED



COMMONWEALTH of VIRGINIA

Department of Forestry

900 Natural Resources Drive, Suite 800 • Charlottesville, Virginia 22903 (434) 977-6555 • Fax: (434) 296-2369 • www.dof.virginia.gov

Wednesday, February 16, 2022

Bryce Barrett
Planning Office
Prince William County
BBarrett@pwcgov.org

Subject: CPA2021-00004, PW Digital Gateway

Dear Bryce,

Thank you for the opportunity to review and comment on the proposed comprehensive plan amendment CPA2021-0004. We have reviewed the Applicant Response and additional proposal documents provided to VDOF on Tuesday, February 1st, 2022.

On Page 25 of 49, the Proposed Plan Text concerning Environmental Protections; Parks and Recreation, Mobility, notes that the proposal will, among other measures:

"

- A. Make a priority the establishment of substantial protected open space (natural open space, Environmental Resource, and habitat corridors) along the Little Bull Run, Lick Branch and Catharpin Creek stream valleys (and their adjoining bluffs, contiguous steep slopes with highly erodible soils, and connected wetlands).
- B. Make a priority the restoration of Environmental Resource (ER) areas within protected open space areas, where such have previously been disrupted or impaired.
- C. Make a priority the perimeter buffering of existing RPAs and flood plains of Little Bull Run, Lick Branch and Catharpin Creek, beyond what current standards require.
- D. Maintain and protect wildlife corridors along the Little Bull Run, Catharpin Creek and Lick Branch streams.
- E. Utilize third-party conservation easements to protect public and private natural open space areas. "

While VDOF supports the decision to make these measures "a priority", these proposals do not ensure that any quantifiable measures are actually taken. For example, how many acres of open space or ER areas will be created as a result of this amendment?

VDOF recommends that before approving this proposed amendment, Prince William County require the applicant to commit to the mitigation measures they propose and make those commitments quantifiable, including:

- guaranteed acreage to be afforested,
- guaranteed acreage to be placed under conservation easement and,
- guaranteed minimum width of forested riparian buffers.

Should the proposed amendment require any advice or assistance with forest management, pre-harvest planning, mitigation practices, or easement development, please feel free to contact me or other staff at the Department of Forestry.

Sincerely,

Sarah Parmelee Sarah Parmelee

Forestland Conservation Coordinator



Plan Comments Report County Archaeologist Pending

| Plan/Case #: | CPA2021-00004 | I | Date: |
|-----------------------|--|----------|--------------|
| Plan/Case Name: | PW Digital Gateway | | |
| Plan Case Address: | 6385 PAGELAND LN GAINESVILLE VA 20155 | | |
| Reviewer: | Patton, Justin | | |
| | 703-792-5729 | jspattor | n@pwcgov.org |

The following items/issues were noted on your case. Please review and provide a letter responding to these comments, along with revised plans and proffers. Please be advised that staff might not identify all of the issues that arise during the case review and public hearing process. In addition, the solutions to the issues identified in this correction report might not be the only solutions, but are thought to be the most desirable solutions as determined by staff. Please note that any modifications will result in further review by pertinent agencies and staff, and could result in changes to the analysis and/or any recommendations.

Section I - Comments that Require Applicant's Response:

NO COMMENTS

Section II - Questions/General Information:



Plan Comments Report Crime Prevention Police

Review Completed

| Plan/Case #: | CPA2021-00004 | | Date: 02/02/2022 |
|-----------------------|--|-----------|-------------------------|
| Plan/Case Name: | PW Digital Gateway | | |
| Plan Case Address: | 6385 PAGELAND LN GAINESVILLE VA 20155 | | |
| Reviewer: | Trujillo, Juan | | |
| | 571-492-8503 | Jtrujillo | o@pwcgov.org |

The following items/issues were noted on your case. Please review and provide a letter responding to these comments, along with revised plans and proffers. Please be advised that staff might not identify all of the issues that arise during the case review and public hearing process. In addition, the solutions to the issues identified in this correction report might not be the only solutions, but are thought to be the most desirable solutions as determined by staff. Please note that any modifications will result in further review by pertinent agencies and staff, and could result in changes to the analysis and/or any recommendations.

Section I - Comments that Require Applicant's Response:

NO COMMENTS

Section II - Questions/General Information:

The Police Department has reviewed the application for CPA2021-00004 PWC Digital Gateway. The proposed Comprehensive Plan Amendment will amend the Long-Range Land Use for the subject 2,133 acre area from AE (Agricultural or Estate) + ER (Environmental Resource) to T/F (Technology/Flex) + ER (Environmental Resource). The Police Department does not believe this application will create a significant impact on Police calls for service.

The Police Department has reviewed the application for CPA2021-00004 PWC Digital Gateway. The applicant requests a Comprehensive Plan Amendment to create a digital corridor. The Police Department does not believe this application will create a significant impact on Police calls for service.



Plan Comments Report Fairfax County

Reviewed w/Comments

| Plan/Case #: | CPA2021-00004 | Date: 02/23/2022 |
|-----------------------|--|-------------------------|
| Plan/Case Name: | PW Digital Gateway | |
| Plan Case Address: | 6385 PAGELAND LN GAINESVILLE VA 20155 | |
| Reviewer: | Byron, Barbara | |
| | 703-324-9300 | |

The following items/issues were noted on your case. Please review and provide a letter responding to these comments, along with revised plans and proffers. Please be advised that staff might not identify all of the issues that arise during the case review and public hearing process. In addition, the solutions to the issues identified in this correction report might not be the only solutions, but are thought to be the most desirable solutions as determined by staff. Please note that any modifications will result in further review by pertinent agencies and staff, and could result in changes to the analysis and/or any recommendations.

Section I - Comments that Require Applicant's Response:

SEE ATTACHED

Section II - Questions/General Information:

SEE ATTACHED



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: KAPAK

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.



Rebecca Horner CPA #2021-00004 Page 2

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

Rebecca Horner CPA #2021-00004 Page 3

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 lowdensity 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 polices 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.



Plan Comments Report Fire Marshal's Office

Reviewed w/Comments

| Plan/Case #: | CPA2021-00004 | Date: 02/01/2022 |
|-----------------------|--|-------------------------|
| Plan/Case Name: | PW Digital Gateway | |
| Plan Case Address: | 6385 PAGELAND LN GAINESVILLE VA 20155 | |
| Reviewer: | Little, Ernest | |
| | 703-792-6883 | elittle@pwcgov.org |

The following items/issues were noted on your case. Please review and provide a letter responding to these comments, along with revised plans and proffers. Please be advised that staff might not identify all of the issues that arise during the case review and public hearing process. In addition, the solutions to the issues identified in this correction report might not be the only solutions, but are thought to be the most desirable solutions as determined by staff. Please note that any modifications will result in further review by pertinent agencies and staff, and could result in changes to the analysis and/or any recommendations.

Section I - Comments that Require Applicant's Response:

NO COMMENTS

Section II - Questions/General Information:

- 1.01- Fire/Rescue Stations 22 and 15 are the first due fire/rescue resources in the corridor.
- 1.02- The facility is outside the required 4 minute travel time for Basic Life Support and Fire from either Fire/Rescue resource.
- 1.03- The facility is inside the required 8 minute travel time for Advanced Life Support.
- 1.04- Fire/Rescue Stations 22 and 15 responded to 1,480 and 868 incidents in FY 21 respectively.
- 1.05- The workload capacity for Fire/Rescue Stations 22 and 15 is 4,000 and 2,000 incidents per year respectively.
- 1.06- Commercial use, such as data centers, will require fire flow of at least 2,500 gallons of water per minute at 20 psi residual pressure available at the site(s).
- 2.01- Fire/Rescue Stations 22 and 15 are the first due fire/rescue resources in the corridor.
- 2.02- The facility is outside the required 4-minute travel time for Basic Life Support and Fire from

either Fire/Rescue resource.

- 2.03- The facility is inside the required 8-minute travel time for Advanced Life Support.
- 2.04- Fire/Rescue Stations 22 and 15 responded to 1,480 and 868 incidents in FY 21 respectively.
- 2.05- The workload capacity for Fire/Rescue Stations 22 and 15 is 4,000 and 2,000 incidents per year respectively.
- 2.06- Commercial use, such as data centers, will require fire flow of at least 2,500 gallons of water per minute at 20 psi residual pressure available at the site(s).



Plan Comments Report Finance

Reviewed w/Comments

| Plan/Case #: | CPA2021-00004 | Date: 02/22/2022 |
|-----------------------|--|-------------------------|
| Plan/Case Name: | PW Digital Gateway | |
| Plan Case Address: | 6385 PAGELAND LN GAINESVILLE VA 20155 | |
| Reviewer: | Leclerc, Tim | |
| | 703-792-6724 | TLeclerc@pwcgov.org |

The following items/issues were noted on your case. Please review and provide a letter responding to these comments, along with revised plans and proffers. Please be advised that staff might not identify all of the issues that arise during the case review and public hearing process. In addition, the solutions to the issues identified in this correction report might not be the only solutions, but are thought to be the most desirable solutions as determined by staff. Please note that any modifications will result in further review by pertinent agencies and staff, and could result in changes to the analysis and/or any recommendations.

Section I - Comments that Require Applicant's Response:

SEE ATTACHED

Section II - Questions/General Information:

SEE ATTACHED

Good afternoon Bryce & Meika!

Finance official comments are as follows:

If this CPA and the resultant data center build-out occurs Finance will need to add a minimum of 1 Principal Fiscal Analyst (C43), 3 Commercial RE Appraisers (C42), 2 Auditors (C42), 2 Business Inspector's (B23), 1 Collector (B23) and 2 Data Processors (B21).

I don't believe there is a 35% commercial tax base goal any longer as mentioned in the answers document, although provided full build-out is accomplished this would certainly make strides towards increasing the commercial tax base. The percentage would be determined, of course, as calculated annually including additional commercial and residential tax revenue increases.

The estimated tax revenue impact of the subject CPA is projected to be approximately \$400.5M including real estate and business tangible property tax, rather than the \$700M mentioned. I did not subtract the current real estate revenue collected annually on the vacant land. The Projected Investment Total is \$24.7B and is located at the bottom of the attached model, as well as it's component parts.

Substituting the FY2023 proposed tax rates for real estate and computer and peripherals increases the projected total tax revenue to \$410.5M, reducing the real estate tax revenue (RE taxes for all taxpayers both residents and businesses would decrease) while increasing the business tangible tax revenue.

I've attached the base model delineating the ratio chosen (Retail vs. Powered Shell), assumptions utilized as well as the tax rates resulting in the estimated tax revenue and projected investment (in 2022 dollars).

Changing the ratio, which is highly likely, results in a range of values for the tax revenue of \$328.5M to \$472.3M.

Changing the Computer & Peripheral rate to \$2.20 per \$100 of valuation (which is roughly equivalent to the rate Citizens pay on their vehicles due to PPT Relief) yields an estimated total tax revenue of \$481.2M; increasing it to \$3.70 per \$100 of valuation, which is the highest rate allowed by law unless the Board chose to increase the vehicle rate too, yields an estimated total tax revenue of \$654.1M, but would impact all businesses.

It should be noted that there is not enough information to properly build this model and the results can and will vary immeasurably; Square Footage is NOT an accurate driver of real estate or business tangible property valuations for Data Centers as they lease POWER rather than space.

The real estate valuation includes land and improvements (buildings) but it does not include the vacant land valuation increase until it is improved, although the vacant land (post rezoning) would increase in value.

There is currently legislation (SB513 sponsor: Senator McPike) in the general assembly, as lobbied for by the data center community in an attempt to standardize and lower real estate valuations for the industry as a whole across the Commonwealth. I believe there is an identical bill from the House. It appears to be on track to pass and become effective July 1, 2022 which would impact Prince William's assessed values as of January 1, 2023 (FY2024 revenue), although anything is possible.

Sincerely,



Department of Finance Tax Rates 2021



| PERSONAL PROPERTY | | |
|--|---|--|
| Personal Property - Tax Relief (PPTRA) | | |
| Assessed Value of a Vehicle | Percent of Tax Relief | |
| \$1,000 or less | 100% | |
| \$1,001 - \$20,000 | 45% | |
| \$20,000 or more | 45% on the first \$20,000 of assessed value | |
| Personal Property - License Fee | | |
| Vehicles - Include Automobiles, Trucks, and | \$33.00 | |
| Motorhomes | | |
| Motorcycles | \$20.00 | |
| Personal Property - per \$100 of valuation | | |
| General Class: vehicles, certain trailers, and motorcycles | \$ 3.70 | |
| General Class: business equipment, furniture, fixtures | \$ 3.70 | |
| Heavy Equipment and Machinery | \$ 3.70 | |
| Machinery and tools used in manufacturing, mining, | \$ 2.00 | |
| water well drilling, processing or reprocessing, radio or | | |
| television broadcasting, dairy, dry cleaning or laundry | | |
| business and all other classifications of machinery | | |
| and tools | | |
| Mobile (Manufactured) Homes | \$ 1.115 | |
| Programmable Computer Equipment and Peripherals used in a Trade/Business | \$ 1.50 | |
| Computer Equipment and Peripheral used in a data center | \$1.50 | |
| Tangible personal property used in a Research & Development business | \$ 1.00 | |
| Due to the low tax rate (.00001) per \$100 of assessed value | e for property tax classifications listed below, no tax bills | |
| are generated if the assessed value is \$50,000,000 or less. | | |
| Small scheduled aircraft, other aircraft, and flight simulators | \$ 0.00001 | |
| One vehicle owned or leased by a volunteer emergency medical services agency | \$ 0.00001 | |
| One vehicle owned or leased by an auxiliary volunteer | \$ 0.00001 | |
| fire department or | | |
| Farmers Machinery and Tools | \$ 0.00001 | |
| Certain personal property owned by elderly and handicapped persons | \$ 0.00001 | |

| Privately-owned camping and travel trailers used for recreational purposes and privately-owned trailers designed and used for the transportation of horses | \$ 0.00001 |
|---|------------|
| Privately-owned vans with a seating capacity of not less than seven nor more than fifteen persons, including the driver, used exclusively pursuant to a ridesharing arrangement | \$ 0.00001 |
| Privately-owned motor homes used for recreational purposes | \$ 0.00001 |
| Vehicles specially equipped to transport disabled persons | \$ 0.00001 |
| Boats and watercraft used for recreational purposes and all other boats | \$ 0.00001 |

| REAL ESTATE | | |
|--|-----------|--|
| Real Estate - per \$100 of valuation | | |
| Base Rate | \$ 1.1150 | |
| Fire and Rescue Levies (Countywide, except for the Town of Quantico) | \$ 0.0800 | |
| Mosquito and Forest Pest Management (previously Gypsy Moth) | \$ 0.0025 | |
| Solid Waste Management Annual Fee | | |
| Single Family | \$ 70.00 | |
| Townhouse | \$ 63.00 | |
| Mobile Home | \$ 56.00 | |
| Multi Family (Apartment or Condo) | \$ 47.00 | |
| Business/Non-Residential | \$ 70.00 | |
| (per SFE where a SFE = 1.3 tons) | | |
| Storm Water Management Annual Fee | | |
| Single Family | \$ 39.36 | |
| Townhouse | \$ 29.52 | |
| Mobile Home | \$ 29.52 | |
| Multi Family (Apartment or Condo) | \$ 29.52 | |
| Business/Non-Residential (per 2,059 sq. ft. of impervious area) | \$ 39.36 | |
| Service District Levies | | |
| Bull Run Mountain | \$ 0.123 | |
| Lake Jackson | \$ 0.1650 | |
| Transportation District Levies | | |

| 234-Bypass | \$ 0.0200 |
|--|-------------------|
| Overlapping Governments | |
| Town of Dumfries (real estate) | call 703-221-3400 |
| Town of Haymarket (real estate and business personal property) | call 703-754-4816 |
| Town of Occoquan (real estate) | call 703-491-1918 |
| Town of Quantico (real estate) | call 703-640-7411 |

| BUSINESS | |
|---|---------------|
| Business License - per \$100 gross receipts | |
| Contractors, Builders and Developers | \$0.13 |
| Business Services, Personal Services, Repair Services | \$0.21 |
| and Other Services | |
| Financial Services | \$0.33 |
| Hotels, Motels and Lodging Facilities | \$0.26 |
| Professional Occupation | \$0.33 |
| Real Estate Services | \$0.33 |
| Research and Development *see VA Code 58.1-706(D)(1) | \$0.03 |
| Retail Merchants | \$0.17 |
| Wholesale Merchants per \$100 gross purchases | \$0.05 |
| Funds received by a person, firm, or corporation designated as the principal or | \$0.03 |
| prime contractor for identifiable federal | |
| appropriations for research and | |
| development services as defined by Section 11.1- 17(a)(9) of the PWC Code | |
| 17(a)(3) of the PWC Code | |
| Mixed Drink License (Flat Fee) | \$200 - \$500 |
| Peddlers (Flat Fee) | \$500 |
| Public Utilities-Electric and Natural Gas-per Section | \$0.50 |
| Public Utilities-All Others-per Section 11.1-20 of the PWC Code | \$0.29 |
| | |

UTILITIES

Natural Gas - Consumer Utility Tax

Residential Users - Minimum Billing Charge \$1.60 + \$0.06 per CCF not to exceed \$3.00 per month.

Commercial Users - Minimum Billing Charge \$3.35 + \$0.085 per CCF not to exceed \$100.00 per month.

Natural Gas - Local Consumption Tax

All Users - \$.004 per CCF with a consumption ceiling of 500 CCF per state code.

Electricity - Consumer Utility Tax

Residential Users - Minimum Billing Charge \$1.40 + \$0.01509 per kWh not to exceed \$3.00 monthly.

Commercial Users - Minimum Billing Charge \$2.29 + \$0.013487 per kWh not to exceed \$100.00 monthly.

Electricity - Local Consumption Tax

All Users -

\$0.00038 per kWh from 0 to 2,500 kWh, per state code

\$0.00024 per kWh from 2,501 to 50,000 kWh, per state code

\$0.00018 per kWh in excess of 50,000 kWh, per state code

Communications – Virginia Sales and Use Tax

5% Communications Sales tax on telecommunications services

\$0.75 State E-911 tax for landline and Voice Over Internet Protocol phones

\$0.50 Prepaid Wireless E-911 tax for mobile phones

\$1.09 Landline telephone and cable TV franchise right of way fee (will increase to \$1.20 in July 2019)

MISCELLANEOUS

Miscellaneous Tax Types

- Daily Rental Tax Short Term Rental Business 1% of the gross proceeds arising from rental of tangible personal property.
- Daily Rental Tax Heavy Equipment Rental Business 1.5% of the gross proceeds arising from rental of heavy equipment property.
- Transient Occupancy Tax 7% of total charge for lodging or space furnished to a transient.

| Ratio | | | Assu | mp | tions | | | | | | Disclaimer | /W | arning: | | |
|-------------------------------|------------|-----------|-----------------------|----|-----------------|-----|---------------|----|------------------|-----|----------------|-------------|---------------|-----|---------------|
| Sq Ft* | 27,600,000 | | Powered Shell: | | \$160/sf | | | | Square Fo | ota | ige is NOT a R | elia | ble Driver of | Val | uation |
| Powered Shell | 50% | | Retail (\$/MW): | | \$8,500,000 | | | | Projected | | | | | | _ |
| Retail Data Center | 50% | | kW / Sq Ft** | | 0.07 | | | | Annual Tax | | | | | | |
| * added 600,000 Sq Ft year 10 | | | C&P / Sq Ft | | \$6.265 | | | | Revenue | | | | | | |
| | | | F&F / Sq Ft | | \$3.724 | | | | at Build-Out | | | | | | |
| | | | BTP / Sq Ft*** | | \$9.989 | | | | (2022 Dollars) | | | | | | |
| | | | ** 1,000 kW = 1 MW | | | | | | \$400,463,925 | | | | | _ | |
| | | | ** BTP TY2021 average | | | | \$1.1975 | << | << Tax Rates >>> | | \$1.5000 | | \$3.7000 | | |
| Phasing Assumptions | Year | New Sq Ft | Cumulative Sq Ft | As | sumed Valuation | | RE | To | otal Tax Revenue | | C&P | | F&F | | ВТР |
| 10% | Year 1 | 675,000 | 675,000 | \$ | 254,812,500 | \$ | 3,051,380 | \$ | 9,793,955 | \$ | 4,228,875 | \$ | 2,513,700 | \$ | 6,742,575 |
| 27,000,000 * 10% = | Year 2 | 675,000 | 1,350,000 | \$ | 509,625,000 | \$ | 6,102,759 | \$ | 19,587,909 | \$ | 8,457,750 | \$ | 5,027,400 | \$ | 13,485,150 |
| 2,700,000/4 = | Year 3 | 675,000 | 2,025,000 | \$ | 764,437,500 | \$ | 9,154,139 | \$ | 29,381,864 | \$ | 12,686,625 | \$ | 7,541,100 | \$ | 20,227,725 |
| 675,000/year | Year 4 | 675,000 | 2,700,000 | \$ | 1,019,250,000 | \$ | 12,205,519 | \$ | 39,175,819 | \$ | 16,915,500 | \$ | 10,054,800 | \$ | 26,970,300 |
| 25% | Year 5 | 1,687,500 | 4,387,500 | \$ | 1,656,281,250 | \$ | 19,833,968 | \$ | 63,660,705 | \$ | 27,487,688 | \$ | 16,339,050 | \$ | 43,826,738 |
| 27,000,000 * 25% = | Year 6 | 1,687,500 | 6,075,000 | \$ | 2,293,312,500 | \$ | 27,462,417 | \$ | 88,145,592 | \$ | 38,059,875 | \$ | 22,623,300 | \$ | 60,683,175 |
| 6,750,000/4 = | Year 7 | 1,687,500 | 7,762,500 | \$ | 2,930,343,750 | \$ | 35,090,866 | \$ | 112,630,479 | \$ | 48,632,063 | \$ | 28,907,550 | \$ | 77,539,613 |
| 1,687,500/year | Year 8 | 1,687,500 | , , | \$ | 3,567,375,000 | \$ | 42,719,316 | \$ | 137,115,366 | \$ | 59,204,250 | \$ | 35,191,800 | \$ | 94,396,050 |
| 30% | Year 9 | 2,025,000 | 11,475,000 | \$ | 4,331,812,500 | \$ | 51,873,455 | \$ | 166,497,230 | \$ | 71,890,875 | \$ | 42,732,900 | \$ | 114,623,775 |
| 27,000,000 * 30% = | Year 10 | 2,625,000 | 14,100,000 | \$ | 5,322,750,000 | \$ | 63,739,931 | \$ | 204,584,831 | \$ | 88,336,500 | | 52,508,400 | \$ | 140,844,900 |
| 8,100,000/4 = | Year 11 | 2,025,000 | 16,125,000 | \$ | 6,087,187,500 | \$ | 72,894,070 | \$ | 233,966,695 | \$ | 101,023,125 | \$ | 60,049,500 | \$ | 161,072,625 |
| 2,025,000/year | Year 12 | 2,025,000 | 18,150,000 | \$ | 6,851,625,000 | \$ | 82,048,209 | \$ | 263,348,559 | \$ | 113,709,750 | | 67,590,600 | \$ | 181,300,350 |
| 25% | Year 13 | 1,687,500 | 19,837,500 | \$ | 7,488,656,250 | \$ | 89,676,659 | \$ | 287,833,446 | \$ | 124,281,938 | \$ | 73,874,850 | \$ | 198,156,788 |
| 27,000,000 * 25% = | Year 14 | 1,687,500 | 21,525,000 | \$ | 8,125,687,500 | \$ | 97,305,108 | \$ | 312,318,333 | \$ | 134,854,125 | \$ | 80,159,100 | \$ | 215,013,225 |
| 6,750,000/4 = | Year 15 | 1,687,500 | 23,212,500 | \$ | 8,762,718,750 | \$ | 104,933,557 | \$ | 336,803,220 | \$ | 145,426,313 | \$ | 86,443,350 | \$ | 231,869,663 |
| 1,687,500/year | Year 16 | 1,687,500 | 24,900,000 | \$ | 9,399,750,000 | \$ | 112,562,006 | \$ | 361,288,106 | \$ | 155,998,500 | \$ | 92,727,600 | \$ | 248,726,100 |
| 10% | Year 17 | 675,000 | 25,575,000 | \$ | 9,654,562,500 | \$ | 115,613,386 | \$ | 371,082,061 | \$ | 160,227,375 | \$ | 95,241,300 | \$ | 255,468,675 |
| 27,000,000 * 10% = | Year 18 | 675,000 | 26,250,000 | \$ | 9,909,375,000 | \$ | 118,664,766 | \$ | 380,876,016 | \$ | 164,456,250 | \$ | 97,755,000 | \$ | 262,211,250 |
| 2,700,000/4 = | Year 19 | 675,000 | 26,925,000 | \$ | 10,164,187,500 | \$ | 121,716,145 | \$ | 390,669,970 | \$ | 168,685,125 | \$ | 100,268,700 | \$ | 268,953,825 |
| 675,000/year | Year 20 | 675,000 | 27,600,000 | \$ | 10,419,000,000 | \$ | 124,767,525 | \$ | 400,463,925 | \$ | 172,914,000 | \$ | 102,782,400 | \$ | 275,696,400 |
| | | | Projected Tax | Re | evenue Totals | \$: | 1,311,415,181 | \$ | 4,209,224,081 | \$ | 1,817,476,500 | \$ 1 | 1,080,332,400 | \$ | 2,897,808,900 |

| Projected Investment Total | \$24,724,502,703 | \$10,419,000,000 |
|----------------------------|------------------|------------------|
| | | Real Estate |
| | | Valuation |

| \$11,527,600,000 | \$2,777,902,703 | \$14,305,502,703 |
|------------------|-----------------|--------------------------|
| Computer & | Furniture & | Business Tangible |
| Peripherals | Fixtures | Property |



Plan Comments Report Health Department Pending

| Plan/Case #: | CPA2021-00004 | Date: |
|-----------------------|--|----------------------------------|
| Plan/Case Name: | PW Digital Gateway | |
| Plan Case Address: | 6385 PAGELAND LN GAINESVILLE VA 20155 | |
| Reviewer: | Anderson, Joshua | - |
| | 703-792-7335 | Joshua.Anderson@vdh.virginia.gov |

The following items/issues were noted on your case. Please review and provide a letter responding to these comments, along with revised plans and proffers. Please be advised that staff might not identify all of the issues that arise during the case review and public hearing process. In addition, the solutions to the issues identified in this correction report might not be the only solutions, but are thought to be the most desirable solutions as determined by staff. Please note that any modifications will result in further review by pertinent agencies and staff, and could result in changes to the analysis and/or any recommendations.

Section I - Comments that Require Applicant's Response:

NO COMMENTS

Section II - Questions/General Information:



Plan Comments Report Historical Commission Reviewed w/Comments

| Plan/Case #: CPA2021-00004 | | Date: |
|----------------------------|--|---------------------|
| Plan/Case Name: | PW Digital Gateway | |
| Plan Case Address: | 6385 PAGELAND LN GAINESVILLE VA 20155 | |
| Reviewer: | Patton, Justin | |
| | 703-792-5729 | jspatton@pwcgov.org |

The following items/issues were noted on your case. Please review and provide a letter responding to these comments, along with revised plans and proffers. Please be advised that staff might not identify all of the issues that arise during the case review and public hearing process. In addition, the solutions to the issues identified in this correction report might not be the only solutions, but are thought to be the most desirable solutions as determined by staff. Please note that any modifications will result in further review by pertinent agencies and staff, and could result in changes to the analysis and/or any recommendations.

Section I - Comments that Require Applicant's Response: See

Attached Draft Land Development Recommendations from the February 8, 2022.

Rezoning Proffers - Cultural Resources Proffer

For Comprehensive Plan Amendment (CPA): Recommend splitting the parcel into South and North sections (see attached map).

Southern section - keep existing land use or change to Parks and Open Space (P&OS).

Northern section – before decision on the CPA, request an Architectural Survey and

Evaluation of above ground resources; those above ground resources eligible for listing on the National Register of Historic Places should be preserved in place.

Northern Section - Mitigation so any new buildings, structures, power lines, towers are not visible from the Manassas National Battlefield Park

Northern section - request Phase I study with a rezoning application and, if warranted, Phase II evaluation and Phase III data recovery study. Artifacts to be donated to and curated with the County;

If rezoning is requested: Southern section same as CPA recommendation.

Cemeteries - in all sections to be preserved in place with enhanced preservation area/buffers;

| Section | TT _ | Questions | /Ganaral | Inform | nation |
|---------|------|------------------|-----------|--------|---------|
| Section | 11 - | Ouestions | , denerai | THIOLD | nation: |

HISTORICAL COMMISSION MEETING – February 8, 2022

DRAFT LAND DEVELOPMENT RECOMMENDATIONS

Resolution to be approved at the March 8th meeting of the Historical Commission

| Case Number | <u>Name</u> | <u>Recommendation</u> |
|----------------|---|--|
| REZ2021-00019 | Compton Property 2nd Submission | Conduct an architectural survey and record all buildings and structures. Provide first right of refusal to the County to salvage historic building materials. Applicant to fabricate and install 3 or 4 interpretive signs in the planned pocket parks with content provided by the Historical Commission on 3 subjects - the Lewis family, dairy farming and the Civil War. |
| CLID2024 00020 | Carranton Duan out 22nd Culturalisation | N. Franks an Maril |
| SUP2021-00030 | Compton Property 2nd Submission | No Further Work |
| CPA2021-00005 | Compton Property 2nd Submission | No Further Work |
| SUP2022-00015 | River Ridge Energy Center | No Further Work |
| PFR2021-00024 | River Ridge Energy Center | No Further Work |
| REZ2022-00015 | Potomac Technology Park | Table |
| SUP2022-00016 | Potomac Technology Park | Table |
| PFR2022-00001 | Rixlew Substation | Cemetery delineation. Phase I study and, if warranted, Phase II evaluation and Phase III data recovery study. Artifacts to be donated to and curated with the County. |
| SUP2022-00017 | Love Church | No Further Work |

| <u>Name</u> | <u>Recommendation</u> |
|--|---|
| Name PW Digital Gateway – 2 nd Submission | Request applicant provide specific responses to previous Historical Commission recommendations and include citations as appropriate. For Comprehensive Plan Amendment (CPA): Recommend splitting the parcel into South and North sections (see attached map). Southern Section - keep existing land use or change to Parks and Open Space (P&OS). Northern Section - before decision on the CPA, request an Architectural Survey and Evaluation of above ground resources; those above ground resources eligible for listing on the National Register of Historic Places should be preserved in place. Northern Section - mitigation so any new buildings, structures, power lines, towers are not |
| | Northern Section - mitigation so any new buildings, structures, power lines, towers are not visible from the Manassas |
| | National Battlefield Park. Northern Section - request Phase I study with a rezoning application and, if warranted, Phase II evaluation and Phase III data recovery study. Artifacts to be donated to and curated with the County. If rezoning is requested: Southern section same as CPA recommendation. |
| | |

| <u>Case Number</u> | <u>Name</u> | <u>Recommendation</u> |
|--------------------|-------------|---------------------------------|
| | | Cemeteries - in all sections to |
| | | be preserved in place with |
| | | enhanced preservation |
| | | area/buffers. |



Plan Comments Report Journey Through Hallowed Ground Comments Not Received

| Plan/Case #: | CPA2021-00004 | Date: |
|-----------------------|--|--------------------|
| Plan/Case Name: | PW Digital Gateway | |
| Plan Case Address: | 6385 PAGELAND LN GAINESVILLE VA 20155 | |
| Reviewer: | Wilkins, Katherine | |
| | 540-882-4929 | katherine@jthg.org |

The following items/issues were noted on your case. Please review and provide a letter responding to these comments, along with revised plans and proffers. Please be advised that staff might not identify all of the issues that arise during the case review and public hearing process. In addition, the solutions to the issues identified in this correction report might not be the only solutions, but are thought to be the most desirable solutions as determined by staff. Please note that any modifications will result in further review by pertinent agencies and staff, and could result in changes to the analysis and/or any recommendations.

Section I - Comments that Require Applicant's Response:

NO COMMENTS

Section II - Questions/General Information:



Plan Comments Report Long Range Planning Review Completed

| Plan/Case #: | CPA2021-00004 | Date: |
|-----------------------|--|------------------------|
| Plan/Case Name: | PW Digital Gateway | |
| Plan Case Address: | 6385 PAGELAND LN GAINESVILLE VA 20155 | |
| Reviewer: | Mcgettigan, David | |
| | 703-792-7189 | dmcgettigan@pwcgov.org |

The following items/issues were noted on your case. Please review and provide a letter responding to these comments, along with revised plans and proffers. Please be advised that staff might not identify all of the issues that arise during the case review and public hearing process. In addition, the solutions to the issues identified in this correction report might not be the only solutions, but are thought to be the most desirable solutions as determined by staff. Please note that any modifications will result in further review by pertinent agencies and staff, and could result in changes to the analysis and/or any recommendations.

Section I - Comments that Require Applicant's Response:

SEE CASE PLANNER COMMENTS

Section II - Questions/General Information:



Plan Comments Report Loudoun County

Comments Not Received

| Plan/Case #: | CPA2021-00004 | | | |
|-----------------------|--|--|--|--|
| Plan/Case Name: | PW Digital Gateway | | | |
| Plan Case Address: | 6385 PAGELAND LN GAINESVILLE VA 20155 | | | |
| Reviewer: | David, James | | | |
| | | | | |

The following items/issues were noted on your case. Please review and provide a letter responding to these comments, along with revised plans and proffers. Please be advised that staff might not identify all of the issues that arise during the case review and public hearing process. In addition, the solutions to the issues identified in this correction report might not be the only solutions, but are thought to be the most desirable solutions as determined by staff. Please note that any modifications will result in further review by pertinent agencies and staff, and could result in changes to the analysis and/or any recommendations.

Section I - Comments that Require Applicant's Response:

SEE ATTACHED COMMENTS

Section II - Questions/General Information:



1 Harrison Street, SE PO Box 7000 Leesburg, VA 20177-7000 703-777-0246 loudoun.gov/planningandzoning

January 20, 2022

Mr. Bryce Barrett, Senior Planner Prince William County Planning Office 5 County Complex Court, Suite 210 Prince William, VA 22192

RE: Comprehensive Plan Amendment #CPA2021-00004, PW Digital Gateway

Dear Mr. Barrett:

Thank you for the opportunity to comment on the proposed Comprehensive Plan Amendment (CPA) to change the Long-Range Land Use designation of approximately 2,123 acres currently planned for Agricultural or Estate (AE) and Environmental Resource (ER) uses to Technology/Flex (T/F) to allow for the development of data center uses. The area subject to the CPA is located less than one mile from the Loudoun County border. The Loudoun County 2019 General Plan (2019 GP) designates the area of Loudoun County closest to the area that would be subject to the CPA as the Lower Bull Run Subarea of the Transition Policy Area (TPA) (2019 GP, Chapter 2, Transition Policy Area Place Types Map). The 2019 GP designates this area of the County as the Transition Industrial/Mineral Extraction and the Transition Large Lot Neighborhood Place Types (2019 GP, Chapter 2, Transition Policy Area Place Types Map). The Bull Run Quarry is located within the area designated as Transition Industrial/Mineral Extraction Place Type. The surrounding area is designated Transition Large Lot Neighborhood, which anticipates singlefamily detached homes with substantial open space in low-density communities. Agriculture and agriculture-supported uses are also appropriate within this place type (2019 GP, Chapter 2, Transition Large Lot Neighborhood Place Type). While the Bull Run and its associated floodplain will help to provide a buffer between the proposed T/F Land Use (limited to data centers) and Loudoun County's Transition Large Lot Neighborhood Place Type, potential visual impacts on the TPA associated with the proposed data center uses should be considered.

The Written Analysis Narrative and Suggested Plan Policies for the CPA identifies surrounding uses including the South Riding development and high-density development along with the Bull Run Quarry adjacent to Prince William County along Gum Spring Road. Please note, the South Riding development is located north of Braddock Road, approximately 4.5 miles from the CPA area. As stated above, the area adjacent to Prince William County along Gum Springs Road is planned for extractive industry (quarry) uses, low-density residential development, and small-scale non-residential uses with 70% of the site retained as open space.

We request that these comments be considered during the formal public comment period for the CPA. If you have any questions, please contact Marie Genovese, Planner in the Department of Planning and Zoning, at (703) 777-0246.

Sincerely, James David

James David

Acting Director, Loudoun County Department of Planning and Zoning



Plan Comments Report Manassas National Battlefield

Reviewed w/Comments

| Plan/Case #: | CPA2021-00004 | Date: 02/18/2022 |
|-----------------------|--|-------------------------|
| Plan/Case Name: | PW Digital Gateway | |
| Plan Case Address: | 6385 PAGELAND LN GAINESVILLE VA 20155 | |
| Reviewer: | Montez, Raquel | |
| | 703-754-1861 | raquel_montez@nps.gov |

The following items/issues were noted on your case. Please review and provide a letter responding to these comments, along with revised plans and proffers. Please be advised that staff might not identify all of the issues that arise during the case review and public hearing process. In addition, the solutions to the issues identified in this correction report might not be the only solutions, but are thought to be the most desirable solutions as determined by staff. Please note that any modifications will result in further review by pertinent agencies and staff, and could result in changes to the analysis and/or any recommendations.

Section I - Comments that Require Applicant's

Response: SEE ATTACHED

Section II - Questions/General Information:

SEE ATTACHED



United States Department of the Interior NATIONAL PARK SERVICE



Manassas National Battlefield Park 12521 Lee Highway Manassas, VA 20109

February 18, 2022

Mr. Bryce Barrett Planning Office County of Prince William 5 County Complex Court Prince William, VA 22192

Subject: NPS Comments on CPA2021-00004, PW Digital Gateway

Dear Mr. Barrett:

On January 19, 2022, the National Park Service (NPS) received the second submission of review materials for the Comprehensive Plan Amendment (CPA) for the PW Digital Gateway, encompassing approximately 2,133 acres of agricultural and residential land along Pageland Lane. As stated in the previous letter sent by Manassas National Battlefield Park, this area is adjacent to the 5,071 acres of park lands and contains land within the park's legislative boundary as well as 570 acres that have been formally designated by federal or state agencies as significant to the Second Battle of Manassas.

Manassas National Battlefield Park (MNBP) continues to oppose this CPA as presented in the second submission because of its high potential to have adverse effects on both the historic and natural resources within the park's lands and the surrounding area. The second submission provides inadequate protections to the critical historic and natural resources contained within the proposal area. Additionally, the second submission contains multiple inaccuracies about the nature of the situation.

The MNBP is an integral part of Manassas and Prince William County communities. The Park serves as an economic driver and a natural resource anchor for conservation. MNBP stands as a vital part of the history and culture of the community's collective history and our nation's history. The threats posed by this submission would do irreversible harm and negatively impact the park's vast contributions to the community.

The issues contained within the second submission are related to larger issues facing the park that transcend this application. The problems related to environmental impacts, destruction of historic resources and battlefield lands, impacts to viewsheds of the park, and the omnipresent traffic issues are the primary threats to the park and are directly related to challenges the county faces.

Pertinent to the PW Digital Gateway CPA, the park continues to strongly urge the Prince William County Board of Supervisors to consider the threats to the natural and historic resources posed by the CPA and take necessary steps to ensure their protection and preservation in perpetuity. The Manassas National Battlefield Park hopes that the county and potential developers will be willing to join the National Park Service as stewards of our nation's treasures and work to find solutions that will protect both the natural and historic resources that define this community.

Sincerely,

Raquel Montez

Superintendent (Acting)

Raquel Montez



Plan Comments Report Manassas Regional Airport

Comments Not Recieved

| Plan/Case #: | CPA2021-00004 | | |
|-----------------------|---|--|--|
| Plan/Case Name: | PW Digital Gateway | | |
| Plan Case Address: | 6385 PAGELAND LN GAINESVILLE VA 20155 | | |
| Reviewer: | Allabaugh, Richard | | |
| | 703-361-5488 rallabaugh@ci.manassas.va.us | | |

The following items/issues were noted on your case. Please review and provide a letter responding to these comments, along with revised plans and proffers. Please be advised that staff might not identify all of the issues that arise during the case review and public hearing process. In addition, the solutions to the issues identified in this correction report might not be the only solutions, but are thought to be the most desirable solutions as determined by staff. Please note that any modifications will result in further review by pertinent agencies and staff, and could result in changes to the analysis and/or any recommendations.

Section I - Comments that Require Applicant's Response:

NO COMMENTS

Section II - Questions/General Information:



Plan Comments Report Parks and Recreation Reviewed w/Comments

| Plan/Case #: | CPA2021-00004 | Date: 02/25/2022 |
|-----------------------|--|-------------------------|
| Plan/Case Name: | PW Digital Gateway | |
| Plan Case Address: | 6385 PAGELAND LN GAINESVILLE VA 20155 | |
| Reviewer: | Pakkala, Patti | |
| | 703-792-8004 | PPakkala@pwcgov.org |

The following items/issues were noted on your case. Please review and provide a letter responding to these comments, along with revised plans and proffers. Please be advised that staff might not identify all of the issues that arise during the case review and public hearing process. In addition, the solutions to the issues identified in this correction report might not be the only solutions, but are thought to be the most desirable solutions as determined by staff. Please note that any modifications will result in further review by pertinent agencies and staff, and could result in changes to the analysis and/or any recommendations.

Section I - Comments that Require Applicant's Response:

SEE ATTACHED COMMENTS

Section II - Questions/General Information:



Prince William County Department of Parks, Recreation & Tourism Memorandum

February 24, 2022

TO: Bryce Barrett

Planning Office

FROM: Patti Pakkala

Department of Parks, Recreation & Tourism

RE: CPA2021-00004, PW Digital Gateway Comprehensive Plan Amendment

Gainesville Magisterial District

The Prince William County Department of Parks, Recreation & Tourism (DPRT) has reviewed a copy of the subject application and offers the following comments, relevant to the level of service (LOS) standards contained in the Parks, Open Space and Trails Chapter of the Prince William County Comprehensive Plan (adopted March 10, 2020) and park goals identified in the DRPT Parks, Recreation and Open Space Master Plan (adopted October 6, 2020).

APPLICATION SUMMARY

The applicant requests a Comprehensive Plan Amendment to create a Digital Corridor over a collection of parcels along Pageland Road in the Gainesville Magisterial District, extending from Sudley Road at the northern terminus to Rt. 29 at the southern terminus. The application area consists of 592 parcels and comprises approximately 2,132 acres of contiguous land. The application proposes to amend both the text and Long-Range Land Use Map classifications from Agricultural or Estate (AE) and Environmental Resource (ER) to Technology/Flex (T/F) and Environmental Resource. With this, the subject area will be removed from the "Non-development Area" and added to the "Development Area" by an adjustment in the Rural Area Boundary. This change is requested to make available, subject to rezoning, a "significant amount of additional land for new data center facilities".

PARKS AND RECREATION FACILITIES WITHIN THE DESIGNATED PARK PLANNING DISTRICT

Park TypePark NameNeighborhoodNoneCommunityNone

Regional Catharpin Recreational Park

James S. Long Regional Park

Linear/Greenway Catharpin Greenway

Natural/Cultural Resource Bushy Park

School/Community Use Bull Run MS and Mountain View ES

Trails Catharpin Greenway trail

State/Federal Conway Robinson Memorial State Forest Park (includes trails)

Manassas National Battlefield (includes trails)

REVIEW

In previous comments DPRT identified the policies and action strategies from the Parks, Recreation & Tourism Chapter of the County's Comprehensive Plan which we believe are most applicable to this application and will help ensure that appropriate parks and recreation resources are provided should this Comprehensive Plan Amendment be approved. To summarize, the key targets for DPRT are:

- To retain and acquire a minimum of five percent of the total area of the county for Countyowned parks and historic preservation sites, including natural/cultural areas used for the protection of resources, environmental corridors, and the County's trails and blueways.
- Encourage the preservation of private lands and their development, where appropriate, to provide adequate park and recreation facilities, and open space, within new developments.
- Recognize that the Federal, State, and regional parks located within the County are a valuable asset to our community and our citizens and, as such, should be protected.
- Create a dynamic parks and recreation program by providing quality active and passive recreational facilities and programs of a mix and variety to meet the needs of county residents.
- Continue to integrate natural and cultural resource stewardship needs at all levels of land use and programing related decision making.
- Pursue new markets to increase visitation to existing sites and facilities in Prince William County, without adverse impacts to cultural resources.

In support of the above, DPRTs Parks, Recreation & Open Space Master Plan adopted by the BOCS on October 6, 2020, also identifies the following related priorities/opportunities for Park Planning District 2, which encompasses the proposed land area:

- Seek opportunities to extend the Catharpin Greenway trail eastward to Conway Robinson State Forest and Manassas National Battlefield, including equestrian trail connections.
- Seek opportunities to add additional Community, Regional, Linear/Greenway and Natural/Cultural Resource Parks within this PPD.
- Identify outdoor programming opportunities that targets the [magisterial] district's aging population.

With respect to level of service for parks and recreation facilities in PPD 2, DPRTs Master Plan also concludes that: only 1.5% of the land area in PPD 2 is currently available as <u>County</u> parkland; there are no neighborhood or community parks in this PPD, and no quantifiable acreage currently counted as Linear/Greenway Park land.

In conjunction with our review of this application, DPRT has also determined that an existing easement between Conway Robinson State Forest and Manassas Battlefield, between the landowner and the Potomac Appalachian Trail Club, is limited to pedestrian/hiking use and specifically precludes equestrians. To ensure connectivity from the Catharpin Greenway – which is planned to accommodate equestrian trails – an equestrian trail needs to be formalized between Conway Robinson SF and the Battlefield.

DPRT SUMMARY

DPRT finds that this application has the potential to address the three priorities identified in the Parks Master Plan for PPD 2. DPRT finds that the proposed extension of the Catharpin Greenway corridor to Pageland Lane, and potentially east of Pageland Lane to properties owned by the Civil War Preservation Trust, would allow for future equestrian and hiking connections from James S. Long Regional Park to Manassas National Battlefield Park, as planned in the County's Comprehensive Plan. This route will require the greenway trail to follow Catharpin Creek under Pageland Lane to the Trust property, however, and provisions need to be included to ensure that this connection is accommodated with any improvements to Pageland Lane.

The expanded Catharpin Greenway corridor, in the area of Little Bull Run, will also allow for future equestrian and hiking connections from James S. Long Regional Park to Conway Robinson State Forest. As mentioned, staff is aware that there is an existing pedestrian/hiking connection between Conway Robinson SF and Manassas Battlefield, but we were unable to identify a specific equestrian connection. Equestrian trail riding is a high priority in this area of the county and connectivity must be ensured between these two parks. Given the need for community parkland in this PPD and the need to formalize an equestrian connection between the state and federal parkland, DPRT sees several benefits in locating a community park in the area between Conway Robinson SF and Manassas Battlefield. A community park in this location could potentially, in and of itself, offset all three of the priorities identified for PPD 2 in the Parks Master Plan. With this, we would like to continue to discuss with the applicant and County Planning staff any and all opportunities for adding Parks & Open Space land within this corridor, particularly in the area between Conway Robinson SF and Manassas National Battlefield.

If there are any questions regarding the above, please contact Patti Pakkala at ppakkala@pwcgov.org. Thank you.



Plan Comments Report Planning Case Planner Reviewed w/Comments

| Plan/Case #: | CPA2021-00004 | | ate: 02/21/2022 |
|-----------------------|--|-----------|-----------------|
| Plan/Case Name: | PW Digital Gateway | | |
| Plan Case Address: | 6385 PAGELAND LN GAINESVILLE VA 20155 | | |
| Reviewer: | Barrett, Bryce | | |
| | 703-792-8007 | BBarrett@ | ற်pwcgov.org |

The following items/issues were noted on your case. Please review and provide a letter responding to these comments, along with revised plans and proffers. Please be advised that staff might not identify all of the issues that arise during the case review and public hearing process. In addition, the solutions to the issues identified in this correction report might not be the only solutions, but are thought to be the most desirable solutions as determined by staff. Please note that any modifications will result in further review by pertinent agencies and staff, and could result in changes to the analysis and/or any recommendations.

Section I - Comments that Require Applicant's Response:

SEE ATTACHED COMMENTS

Section II - Questions/General Information:



February 21, 2022

TO: John McBride, Esquire

Odin, Feldman, Pittleman, PC 1775 Wiehle Avenue, Suite 400

Reston, Virginia 20190

FROM: Bryce Barrett, Planning Office

Phone Number: 703-792-8007, E-mail: BBarrett@pwcgov.org

SUBJECT: Case Number: Comprehensive Plan Amendment #CPA2021-00004

Case Name: PW Digital Gateway

The 2nd Submission has been reviewed with the following comments:

I. Background is as follows:

A. Request: This is a request for a Comprehensive Plan Amendment (CPA) to amend the Long-Range Land Use text and map classifications from AE, Agricultural or Estate, and ER, Environmental Resource, to T/F, Technology Flex, and ER, Environmental Resource to create a technology corridor along Pageland Lane for the development of data center uses. The request also proposes to remove the subject site from the Rural Area boundary.

The CPA request was initiated by the Board of County Supervisors on July 20, 2021, through Res. No. 21-445 to evaluate the entire corridor between Route 29 and Sudley Road. The Planning Office established five criteria for determining boundary of the $\pm 2,132.7$ -acre study area:

- 1. Original PW Digital Gateway application
- 2. Board directed expansion to include US Route 29 through VA Route 234
- 3. Property owner expressed interest
- 4. Established communities
- 5. Existing cultural and environmental resources
- B. <u>Site Location</u>: The subject ±2,132.7-acre site is located along Pageland Lane between Route 29 and Sudley Road; and is comprised of 197 parcels.
- C. <u>Comprehensive Plan</u>: The subject site is designated as AE, Agricultural or Estate, and ER, Environmental Resource. The site is also located within the Rural Area boundary as defined by the Comprehensive Plan.
- D. <u>Zoning</u>: The site is zoned A-1, Agricultural, and SR-5, Semi-rural Residential.

- E. <u>Surrounding Land Use</u>: The site is adjacent to a mix of residential and agricultural uses to the west and north. To the east are residential and historic areas, specifically the Manassas National Battlefield Park. To the south is the Conway Robinson Forest Park and industrial uses south of Route 29 an in the Development Area of the County.
- F. <u>Data Center Opportunity Zone Overlay District (DCOZOD)</u>: The subject site is not located within the Data Center Opportunity Overlay District.
- II. <u>Long Range Land Use Plan Analysis</u>: This site is located within the Rural Area of the County. The site is designated AE, Agricultural or Estate, and ER, Environmental Resource, on the Long-Range Land Use Map. The following table summarizes the uses and densities that are intended, based upon these designations:

| Long Pango Land Usa | Intended Uses and Densities |
|-------------------------------------|---|
| Long Range Land Use Map Designation | intended Uses and Densities |
| Map Designation | The grown and of the America It was a great and a section in the great at |
| Agricultural or Estate | The purpose of the Agricultural or Estate classification is to protect |
| (AE) | existing agricultural lands, cultural resources, and open space, as well as |
| Foliation | other important rural environmental resources, and to provide areas |
| Existing | within the County where large lot residential development is |
| | appropriate. The maximum density is one dwelling per 10 gross acres. |
| Environmental | This classification is explained in detail within the Environment Plan. |
| Resource (ER) | Therein are located goals, policies, action strategies, and other Plan |
| Existing and Proposed | components designed to protect the sensitive nature of the identified |
| LAISTING UNU I TOPOSCU | resources. Environmental Resources include all 100-year floodplains as |
| | determined by the Federal Emergency Management Agency (FEMA), |
| | Flood Hazard Use Maps or natural 100-year floodplains as defined in |
| | the DCSM, and Resource Protection Areas (RPAs) as defined by the |
| | Chesapeake Bay Preservation Act. In addition, areas shown in an |
| | environmental constraints analysis submitted with a rezoning or special |
| | use permit application with wetlands; 25 percent or greater slopes; |
| | areas with 15 percent or greater slopes in conjunction with soils that |
| | have severe limitations; soils with a predominance of marine clays; |
| | public water supply sources; and critically erodible shorelines and |
| | stream banks are considered part of the Environmental Resource |
| | Designation. |
| | Technology/Flex Industrial areas provide opportunities for production, |
| Technology/Flex (T/F) | flex office/warehouse space, and warehousing uses that do not require |
| Proposed | large outdoor storage or produce nuisances such as noise, dust, or |
| - | vibration. They are less hazardous and limited impacts on surrounding |
| Applicant proposes to | |
| limit development for | areas compared to heavy manufacturing. Buildings in this area have |
| data centers only. | medium to deep setbacks and larger block sizes. Surface parking is |
| | acceptable. |
| | Primary Uses: Data Centers , Healthcare, Life Sciences, Federal |
| | government Contracting, Research and Development, Flex Space, Light |
| | Industrial, Warehousing & Logistics, Advanced Manufacturing |
| | Secondary Uses: Retail & Service Commercial, Office, Institutional, |
| | Public Facilities/Utilities |

| | Target non-residential FAR of up to .57 FAR | |
|----------------------|---|--|
| | Target Land Use Mix: Residential 0%, Non-Residential 100% | |
| | Target Building Height: T-3: 3-5 Stories | |
| | Minimum Open Space: 20% of the site | |
| | Implementing Zoning Districts: PBD, O(F), M-2 | |
| Parks and Open Space | The purpose of this classification is to designate existing and projected | |
| Parks and Open Space | parks and recreational areas of the County. The Parks, Open Space, and | |
| Proposed | Trails Plan contains a complete inventory of existing federal, state, and | |
| | local parks, and of planned parks within the County. | |

- III. Planning Office Recommendation: Following the January 27, 2022 and February 3, 2022 community meetings the Planning Office received a lot of public input on the application. In response to that input our office add will additional project milestones prior to the Planning Office recommendation. These include 1) developing criteria for evaluation to better outline the methodology of the Planning Office recommendations, 2) conducting a spatial/layer analysis of existing conditions including, environmental resources, cultural resources, and existing infrastructure, and 3) incorporate land use analysis for targeted industry uses in collaboration with the Department of Economic Development. The project timeline will be updated to reflect these additional milestones. More information will be published on the project webpage at: https://www.pwcva.gov/department/planning-office/pw-digital-gateway.
- **IV.** The following comments are repeat comments from the 1st submission which further action is required to address:

Long Range Land Use Chapter:

- 1. The intent outlined in the Land Use Chapter recognizes that growth and change will occur and that smart growth principles help ensure open space and cultural resources are preserved, business are supported and expanded, the County's financial health is strengthened, and an exceptional quality of life is provided to County Residents. The County uses the United States Environmental Protection Agency defined smart growth as a ranged of development and conservation strategies that help protect our natural environment and make our communities more attractive, economically stronger, and more socially diverse. The ten principles of smart growth, as adapted by the County, provide a sound basis by which the County can plan for its long-term future:
 - Mix land uses in the Development Area.
 - Take advantage of compact, environmentally friendly and energy efficient building design.
 - Create a range of housing opportunities and choices.
 - Create walkable neighborhoods.
 - Foster distinctive, attractive communities with a strong sense of place.
 - Preserve open space, farmland, cultural resources, natural beauty, and critical environmental areas.

- Strengthen and direct development towards existing communities and infrastructure.
- Provide a variety of transportation choices.
- Make development decisions predictable, fair, and cost-effective.
- Encourage community and stakeholder collaboration.

Provide justification on how the proposed change aligns with the ten strategies outlined above.

- 2. LU-POLICY 1 states: Ensure adequate land uses necessary to provide a supply of land that allows the County to compete on a regional, national, and international basis for advanced technological industries and other economic development opportunities that will bring new jobs to Prince William County residents, particularly new professional and other high-paying jobs. Based on the justification provided in the application the proposal is generally in alignment with this strategy. Continued coordination with the Prince William County Economic Development Department to ensure the proposed land use changes are in alignment with the need for adequate land to support technology uses such as data centers.
- 3. LU2.6 states: Ensure that the primary function of the Rural Area as reflected by the Long-Range Land Use Plan Map is to maintain open space, protect native habitats, allow for large-lot residential development, allow for agricultural activities, and provide potential sites for community facilities. The Applicant has requested removal of the subject site from the Rural Area. The proposed change to T/F would result in areas previously planned for large-lot residential development and agricultural areas to be planned for industrial uses. As outlined above, other primary focus areas relate to open space, protecting native habitats, and providing potential sites for community facilities. Consideration should be given to how these areas could be preserved within the 2,132-acre study area. The Applicant has added Parks and Opens Space designated areas over environmentally sensitive areas including portions of Little Bull Run and Catharpin Creek. However, environmental features in the northern portion of the study area are not included. Further expansion of Parks and Open Space corridors along the ER designated portions could provide further protections of environmental features and connectivity to Catharpin Park.
- 4. LU-POLICY 11 states: Encourage a land use pattern that supports the goals and objectives of the Cultural Resources Plan. Additionally, LU11.1 states: Encourage development densities at the low end of the range of the land use classifications near County Registered Historic Sites (CRHS), as reflected on the Long-Range Land Use Plan Map and in the Cultural Resources Plan. Manassas National Battlefield Park is designated as a CRHS. Currently the proposal uniformly applies development across the study area. Consideration should be given to reducing development potential in the areas adjacent to the Park, as recommended by the Cultural Resources Plan.
- 5. LU-POLICY 14 states: *Protect existing and planned land uses from the encroachment of incompatible land uses.* Incompatible uses are defined in the Land Use Compatibility Section of the Long-Range Land Use Plan. While T/F is not shown on the compatibility matrix

generally AE is shown as incompatible with other industrial designations. It goes on to state: land use classifications identified as "Incompatible" should only be located adjacent to each other when extensive and extraordinary mitigating measures can effectively address all compatibility concerns. Mitigation measures are of particular concern when inherently incompatible land uses such as residential uses and industrial uses are proposed adjacent to one another. The application outlines general mitigation measures. Please provide more detailed information related to mitigation measures such as buffers widths, setbacks, screening and identify areas of emphasis for these measures. Additionally, transitional areas can also be used to mitigate two incompatible uses. Consider expansion of the policy recommendations to address mitigation.

Community Design Chapter

- 1. DES-POLICY 1 states: Encourage site, architectural, signage, and landscape designs that complement the scale and character of existing and planned development in the Development Area and in the Rural Area. Following adoption of the CPA subsequent rezoning applications will be required for development of data centers within the study area. As development is likely to occur as separate applications considerations should be given to developing a design guidelines document for architecture, signage, and landscaping to ensure consistent and uniform development throughout the corridor and provide precedent images to help frame the vision for the corridor. The design guidelines should be incorporated and integrated with the existing policy recommendations included in the proposal.
- 2. DES-POLICY-12 states: Fit new development into the natural landforms, particularly the existing woodland areas of the County. Emphasis should be given to preservation of mature and healthy woodland areas in a coordinated manner that focuses on preserving existing environmental resources and creating open space connections for wildlife and native habitats. Consideration should be given to designating open space corridors. Additionally, as large portions of the study area were previously cleared for farming these areas should be identified for reforestation when identified as potential connections within these corridors and incorporated in the policy recommendations.

General Comments on submission materials:

- Page 1 of the Written Analysis Narrative and Suggested Plan Policies the application references "Non-development area." This is not an identified area within the Comprehensive Plan. The Comprehensive Plan designates Rural Areas and the Development Area. This was not included in the second submission and therefore not addressed.
- 2. On Page 1 of the Written Analysis Narrative and Suggested Plan Policies it references the BOCS Resolution as attached Exhibit A. This exhibit was not included in the application package. This was not included in the second submission and therefore not addressed.

- 3. On Page 1 of the Written Analysis Narrative and Suggested Plan Policies the application refers to data center facilities with ancillary offices. Please provide additional clarification as to what these uses are and how much of the proposed 27.6 million square feet could be developed with these uses. Typically, to be considered a secondary use it should not exceed 25% of the floor area of a development. This was not included in the second submission and therefore not addressed.
- 4. On Page 2 of the Written Analysis Narrative and Suggested Plan Policies the application states the overall FAR is designated as 0.30. Individual sites within the corridor may be rezoned at higher or lower FARs so long as the cumulative average within the corridor remains no more than 0.30. Consideration should be given to establish a maximum FAR for individual developments. This was not included in the second submission and therefore not addressed.
- 5. On Page 2 of the Written Analysis Narrative and Suggested Plan Policies the application it states the building height will be between 1-2 floors. However, on Page 3 it states a three-floor height limitation. Please clarify the language. Additionally, 1-2 floors for data centers can range greatly, please express the building height in feet in addition to floors. This was not included in the second submission and therefore not addressed.
- 6. In several places in the document Sudley Road is referred to as Old Sudley Road. For clarity refer to the name as shown on maps "Sudley Road." This was not included in the second submission and therefore not addressed.
- 7. On Page 4 of the Written Analysis Narrative and Suggested Plan Policies the application states this is a Small Area Plan. While the context and scale are similar the County has not designated this as a Small Area Plan. Therefore, refer to the request as a Comprehensive Plan Amendment instead. This was not included in the second submission and therefore not addressed.
- 8. On Page 5 of the Written Analysis Narrative and Suggested Plan Policies the application includes a linked flyer. All exhibits should be submitted in the application package. This was not included in the second submission and therefore not addressed.
- 9. On the PW Digital Gateway Environmental Resources Narrative of the application it states the area consists of 592 parcels. The study area as provided in County GIS is approximately 197 parcels. This was not included in the second submission and therefore not addressed.
- **V.** The following comments are new comments provided with the 2nd submission:

- Please provide a comment matrix which outlines how comments have been addressed or not addressed with further clarification to better track the status of agency review comments.
- 2. Pageland Lane is shown to be widened to four lanes with a shared use path on the east side. The County as part of its complete street's initiative includes the concept that pedestrian facilities should be provided on both sides of the road. The western side should show a sidewalk in alignment with DCSM standards.
- 3. The Memorial Connector Trail is shown connecting Conway Robinson Forest Park and The Manassas Battlefield National Park providing both equestrian and pedestrian facilities. This trail should be included in the submission and consideration of expansion including additional trails or a trail head to further protect and enhance this existing feature.
- 4. The Planning Office has received input from the property owner located at 7498-42-9679 who has requested to be removed from the interested property owner map. Additionally, there a few properties shown on the Property Owner Expressed Interest Map which the Planning Office has not received input for including GPINs: 7498-56-3513, 7498-66-3583, 7498-76-0192, 7599-13-0663. Please confirm these parcels and provide the record of support to me to ensure the online map is up to date.

If you have any further questions, please feel free to contact me.



Plan Comments Report Planning GIS Specialist

Review Completed

| Plan/Case #: | CPA2021-00004 | | |
|-----------------------|--|----------------------|--|
| Plan/Case Name: | PW Digital Gateway | | |
| Plan Case Address: | 6385 PAGELAND LN GAINESVILLE VA 20155 | | |
| Reviewer: | Mccleary, John | | |
| | 703-792-6859 | JMcCleary@pwcgov.org | |

The following items/issues were noted on your case. Please review and provide a letter responding to these comments, along with revised plans and proffers. Please be advised that staff might not identify all of the issues that arise during the case review and public hearing process. In addition, the solutions to the issues identified in this correction report might not be the only solutions, but are thought to be the most desirable solutions as determined by staff. Please note that any modifications will result in further review by pertinent agencies and staff, and could result in changes to the analysis and/or any recommendations.

Section I - Comments that Require Applicant's Response:

NO COMMENTS

Section II - Questions/General Information:



Plan Comments Report Service Authority (PLN)

Reviewed Completed

| Plan/Case #: | CPA2021-00004 | | Date: |
|-----------------------|--|--|-------|
| Plan/Case Name: | PW Digital Gateway | | |
| Plan Case Address: | 6385 PAGELAND LN GAINESVILLE VA 20155 | | |
| Reviewer: | Barrett, Bryce | | |
| | 703-792-8007 BBarrett@pwcgov.org | | |

The following items/issues were noted on your case. Please review and provide a letter responding to these comments, along with revised plans and proffers. Please be advised that staff might not identify all of the issues that arise during the case review and public hearing process. In addition, the solutions to the issues identified in this correction report might not be the only solutions, but are thought to be the most desirable solutions as determined by staff. Please note that any modifications will result in further review by pertinent agencies and staff, and could result in changes to the analysis and/or any recommendations.

Section I - Comments that Require Applicant's Response:

NO COMMENTS

Section II - Questions/General Information:

4 County Complex Court Woodbridge, VA 22192 Phone (703) 335-7900 www.pwcsa.org

Division of Engineering & Planning Samer S. Beidas, P.E., CCM, Director



December 9, 2021

MEMORANDUM

To: Bryce Barrett

PWC Office of Planning

From: David L. Guerra, P.E.

Re: CPA2021-00004, PW Digital Gateway

The Service Authority's comments regarding this proposed Comprehensive Plan Amendment are as follows:

- The Service Authority has sufficient water treatment capacity to meet projected demands under the current Comprehensive Plan through 2045. Additionally, the Service Authority has confirmed that additional water treatment capacity can be obtained in sufficient quantity to meet development requirements under the CPA based on demand projections by the Service Authority. Additional water capacity would be planned for purchase or development without subsidy by or financial impact to existing customers.
- For wastewater treatment, expansion of treatment capacity at the Upper Occoquan Service Authority (UOSA) Plant is planned in three increments to meet projected flows beyond 2045 under the current Comprehensive Plan. There is the ability to expand UOSA further if needed to meet development requirements under the CPA based on flows projected by the Service Authority. Additional wastewater treatment capacity would be planned for purchase and development without subsidy by or financial impact to existing customers.
- The absence of water and sewer infrastructure in any given part of the Rural Area should not be considered an impediment to development with the "growth pays for growth" policies, as the infrastructure extensions would be designed and constructed by applicants to serve their development. The Service Authority is developing a master plan based on the current Comprehensive Plan and Land Use Policies. A change in density and land use policy would require additional planning studies to determine the optimal water and sewer transmission systems to serve the

PWC Office of Planning Page 2 of 2 CPA2021-00004

proposed development. Properly sizing and extension of existing infrastructure would be planned for development without subsidy by or financial impact to existing customers.

- In accordance with the Service Authority's Development Review Process and System Improvement Policy, which is consistent with the County's Comprehensive Plan and aligned with the growth pays for growth policy, the applicant is responsible for the design and construction of the infrastructure necessary to serve their development. All proposed development projects are reviewed by the Service Authority to determine if the existing water distribution, sewer collection systems, and pump stations are adequate to meet the projected water demands and wastewater flows. Deficiencies will be identified, and the applicant will be notified of their requirements to meet the Service Authority's established performance standards for service.
- Regarding Section III. <u>Land Use Data Centers are suited for the Corridor (Bullet No. 3)</u> shown on Page 8 of 20 of the Written Analysis Narrative: Planned upgrades to the Heritage Hunt Sewage Pumping Station and its infrastructure are to accommodate the build-out of the Little Bull Run sewer shed in accordance with the current Comprehensive Plan and land use policies (sewer flows from the properties/areas covered by the CPA are not accounted for or accommodated by the new Heritage Hunt Sewage Pumping Station and its infrastructure). The Service Authority cannot comment on the statement in this Bullet No. 3 that "Water and sewer lines will not leapfrog across Rural Area designated land because the Corridor abuts the Development Area", as the layout and alignment of infrastructure extensions has not been set at this time.



Plan Comments Report Transportation Dept

Corrections Needed

| Plan/Case #: | CPA2021-00004 | | |
|-----------------------|--|---------------------|--|
| Plan/Case Name: | PW Digital Gateway | | |
| Plan Case Address: | 6385 PAGELAND LN GAINESVILLE VA 20155 | | |
| Reviewer: | Scullin, Elizabeth | | |
| | 703-792-4051 | escullin@pwcgov.org | |

The following items/issues were noted on your case. Please review and provide a letter responding to these comments, along with revised plans and proffers. Please be advised that staff might not identify all of the issues that arise during the case review and public hearing process. In addition, the solutions to the issues identified in this correction report might not be the only solutions, but are thought to be the most desirable solutions as determined by staff. Please note that any modifications will result in further review by pertinent agencies and staff, and could result in changes to the analysis and/or any recommendations.

Section I - Comments that Require Applicant's Response:

Section II - Questions/General Information:

Comments are attached to the case in a Comment Table. The Applicant must reply to the comments directly into the table and provide a Word document for the reviewer's use. The Correction and Recommendation features are no longer used for PWCDOT review.

TIA NOT REQUIRED

COMMENT CATEGORIES:

- 1. CORRECTIONS
- 2. RECOMMENDATIONS
- 3. CLARIFICATIONS

COUNTY PROJECT NUMBER: CPA 2021-00004 DEVELOPER/ENGINEER: GOROVE/SLADE REVIEWER(s): ELIZABETH SCULLIN DATE: 2-7-22

ESCULLIN@PWCGOV.ORG

Type & Submittal # CPA 2021-00004 – 2ND Project Name: PW Digital Gateway

| ITEM No. | Dwg. No. ⁽¹⁾ | COMMENTS | COMMENT CATEGORY | Response ⁽¹⁾ (Date) | FINAL DISPOSITION. (2) |
|-------------|-------------------------------------|---|---------------------|--------------------------------|------------------------|
| | Tech Memo 12-16-21 | | | | |
| 1.01 | General | The Figures are too large a scale to display meaningful information. Example – Figure 1 – it is difficult to distinguish the difference between the colors/number of lanes. Figures 6-8 – the graphic should highlight the road network surrounding the proposed CPA rather than showing an approximate 18 square miles. The information for the roadway network in Fairfax County is not germane for this study. | | | |
| 1.02 | Figure 2 and 2040 Model Runs | It is unclear as to whether Rt. 29 Alternate and Manassas Battlefield Bypass that are in the current Thoroughfare Plan are included in the network. Check the network used in the travel demand model and label these facilities on the graphic. | | | |
| 1.03 | Figures 6-8, 11-13, and 19-21 | These graphics are not meaningful without the actual V/C ratios. A ratio greater than 1.0 doesn't provide a clear indication of the actual V/C. | | | |
| 1.04 | Volumes and V/C Ratios | The memo must include a table comparing the volumes and v/c ratios for Pageland Lane and the surrounding road | | | |

| (1) | To be completed by | Applicant/Engineer | Date of Response | is required. |
|-----|--------------------|-------------------------|---------------------|--------------|
| (') | To be completed by | / ipplically Eliginical | . Date of Mesperise | io required. |

⁽²⁾ The PWC reviewer is responsible for the final disposition of all comments.

TIA NOT REQUIRED

COMMENT CATEGORIES:

- 1. CORRECTIONS
- 2. RECOMMENDATIONS
- 3. **CLARIFICATIONS**

COUNTY PROJECT NUMBER: CPA 2021-00004

Developer/Engineer: Gorove/Slade

Reviewer(s): Elizabeth Scullin

ESCULLIN@PWCGOV.org

Date: 2-7-22

PROJECT NAME: PW DIGITAL GATEWAY

| ITEM No. | Dwg. No. ⁽¹⁾ | COMMENTS | COMMENT CATEGORY | Response ⁽¹⁾ (Date) | FINAL DISPOSITION. (2) |
|-------------|-------------------------------|---|---------------------|--------------------------------|------------------------|
| | | network for AM, PM and Daily cases in all scenarios so that the information can be compared and analyzed. | | | |
| 1.05 | Scoping Document | This document scoped by VDOT, PWCDOT and the Applicant's Traffic Engineer requires that model traffic volumes are included in the analysis. These have not been provided in the memo for the model run alternatives. Without this information, it is difficult to determine what traffic is attributable to the proposed development and what traffic is local/regional traffic that would use Pageland Lane in the No Build condition. | | | |
| 1.06 | General | The application states that a shared use path would be included with the widening of Pageland Lane. Note that the DCSM typical section for a minor arterial includes both a shared use path and a sidewalk. | | | |
| 1.07 | Summary and Conclusions | The memo concludes that Pageland Lane is approaching congestion in 2040 and that the final design of Pageland Lane should be evaluated. Without the volume data and the roadway capacity information, this conclusion cannot be confirmed. The memo doesn't address the impact of the proposed development on the surrounding road network in the County that is showing V/C ratios greater than 1.0, ie Sudley Road, Lee Hwy., Sanders Lane. | | | |

| To be completed by | Applicant/Engineer, Date | of Response is required. |
|--------------------------------------|------------------------------|----------------------------|
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TYPE & SUBMITTAL # CPA 2021-00004 - 2ND

(2) The PWC reviewer is responsible for the final disposition of all comments.

TIA NOT REQUIRED

COMMENT CATEGORIES:

1. CORRECTIONS

2. RECOMMENDATIONS

3. CLARIFICATIONS

COUNTY PROJECT NUMBER: CPA 2021-00004

DEVELOPER/ENGINEER: GOROVE/SLADE

REVIEWER(S): ELIZABETH SCULLIN ESCULLIN@PWCGOV.ORG

DATE: 2-7-22

TYPE & SUBMITTAL # CPA 2021-00004 - 2ND

PROJECT NAME: PW DIGITAL GATEWAY

| ITEM No. | Dwg. No. ⁽¹⁾ | COMMENTS | COMMENT CATEGORY | Response ⁽¹⁾ (Date) | FINAL DISPOSITION. (2) |
|-------------|-------------------------------|--|---------------------|--------------------------------|------------------------|
| 1.08 | Summary and Conclusions | The memo states that a lot of congestion appears outside of Fairfax County. The County determines roadway capacities that are used within the County in the Travel Demand Model. MWCOG determines roadway capacities for the rest of the region, and therefore the capacities shown on this analysis outside of the County are not a true representation of the V/C ratios. | | | |
| 1.09 | Summary and Conclusions | The comment that possible work place changes with increasing teleworking and reduced office trip generation could impact the future year traffic levels and patterns is unfounded. It is assumed for future travel that the peak hours will continue to be at capacity because these are the times that the majority of the people want to travel. The peak periods and time distribution of traffic may change, but the peak hours will remain as the capacity-limiting factor. | | | |
| 1.10 | Summary and Conclusions | The results of the 2040 Travel Demand Forecasts include all planned and widened roads in the 2030 Thoroughfare Plan. These include: • Sudley Road – widen to 4 lanes • Lee Hwy – widen to 6 lanes west of Pageland • Rt. 29 Alternate – new 4 lane road | | | |

| (| 1) | To be completed by | v Applicant/Engineer. | Date of Response is required. |
|---|----|--------------------|-----------------------|-------------------------------|
|---|----|--------------------|-----------------------|-------------------------------|

⁽²⁾ The PWC reviewer is responsible for the final disposition of all comments.

TIA NOT REQUIRED

COMMENT CATEGORIES:

DATE: 2-7-22

- 1. CORRECTIONS
- 2. RECOMMENDATIONS
- 3. CLARIFICATIONS

COUNTY PROJECT NUMBER: CPA 2021-00004 DEVELOPER/ENGINEER: GOROVE/SLADE REVIEWER(S): ELIZABETH SCULLIN

ESCULLIN@PWCGOV.ORG

TYPE & SUBMITTAL # CPA 2021-00004 - 2ND

PROJECT NAME: PW DIGITAL GATEWAY

| ITEM No. | Dwg. No. ⁽¹⁾ | Сомментя | COMMENT CATEGORY | Response ⁽¹⁾ (Date) | FINAL DISPOSITION. (2) |
|-------------|-------------------------|---|---------------------|--------------------------------|------------------------|
| | | • Manassas Battlefield Bypass – new 4 lane road The planned development must be phased based on the capacity of the roadway network at the build out year of the development. Note that the County does not have the funding to construct these projects and no current grant applications to fund them. The majority of the grant funding opportunities require planning studies which take approximately 18-24 months. Funding requests generally are for 6 years in the future for the initiation of the project; therefore it is unlikely that these improvements could be in place within the next 10 years. | | | |
| 1.11 | Att. #3 – Figure 1 | Homeland Security Evacuation Routes – the text refers to "purple" routes but there are no purple routes on the graphic. | | | |
| 1.12 | Att. #3 – Table 3 | The cost estimate is very general and doesn't provide enough detail to verify the costs. It indicates that right of way will have to be purchased in order to widen Pageland Lane. The location of this right of way and quantities must be provided. | | | |
| 1.13 | General | Note that the travel model runs for this CPA are limited in that the office employment added to the Traffic Analysis Zones (TAZ) in the Digital Gateway Corridor must be | | | |

(2) The PWC reviewer is responsible for the final disposition of all comments.

TIA NOT REQUIRED

COMMENT CATEGORIES:

- 1. **C**ORRECTIONS
- 2. RECOMMENDATIONS
- 3. CLARIFICATIONS

COUNTY PROJECT NUMBER: CPA 2021-00004 D

DEVELOPER/ENGINEER: GOROVE/SLADE

REVIEWER(S): ELIZABETH SCULLIN ESCULLIN@PWCGOV.ORG

DATE: 2-7-22

TYPE & SUBMITTAL # CPA 2021-00004 - 2ND

PROJECT NAME: PW DIGITAL GATEWAY

| ITEM No. | Dwg. No. ⁽¹⁾ | Сомментя | COMMENT CATEGORY | RESPONSE ⁽¹⁾ (DATE) | FINAL DISPOSITION. (2) |
|---|-------------------------|--|---------------------|--------------------------------|------------------------|
| | | removed from other zones to account for the MWCOG Cooperative Forecast demographic control totals. If this is not done, the model balances employment with population/households. It will automatically relocate work trips to fill those jobs created in the DG Corridor by calculating fewer work trips made to all other zones. Given this, this site traffic analysis will likely produce different results than the regional travel model run for the Comp Plan Update which will include recommended land uses from the Planning Office within the MWCOG control totals. | | | |
| A graphic that was included with the Scoping Document presented showed a realignment of Pageland Lane and widening the road from two to four lanes. This improvement cannot be considered as part of the CPA because the travel demand model runs did not analyze Rt. 1.14 General 234 North Extended that would parallel Pageland Lane. If the County determines that Rt. 234 North should be included in the Thoroughfare Plan, the County will analyze how Pageland Lane will interface with Rt. 234 North, the width of Pageland Lane and where intersections will be allowed. | | | | | |

| | (| 1) | To be completed by | v Applicant/Engineer | . Date of Response is required. |
|--|---|----|--------------------|----------------------|---------------------------------|
|--|---|----|--------------------|----------------------|---------------------------------|

⁽²⁾ The PWC reviewer is responsible for the final disposition of all comments.



Plan Comments Report VDOT Fairfax Pending

| Plan/Case #: | CPA2021-00004 | Date: |
|-----------------------|--|---------------------|
| Plan/Case Name: | PW Digital Gateway | |
| Plan Case Address: | 6385 PAGELAND LN GAINESVILLE VA 20155 | |
| Reviewer: | Scullin, Elizabeth | |
| | 703-792-4051 | escullin@pwcgov.org |

The following items/issues were noted on your case. Please review and provide a letter responding to these comments, along with revised plans and proffers. Please be advised that staff might not identify all of the issues that arise during the case review and public hearing process. In addition, the solutions to the issues identified in this correction report might not be the only solutions, but are thought to be the most desirable solutions as determined by staff. Please note that any modifications will result in further review by pertinent agencies and staff, and could result in changes to the analysis and/or any recommendations.

Section I - Comments that Require Applicant's Response:

VDOT has 90 days to review the applicant submission

Section II - Questions/General Information:



Plan Comments Report Watershed Management

Reviewed w/Comments

| Plan/Case #: | CPA2021-00004 | Date: 02/23/2022 |
|-----------------------|--|-------------------------|
| Plan/Case Name: | PW Digital Gateway | |
| Plan Case Address: | 6385 PAGELAND LN GAINESVILLE VA 20155 | |
| Reviewer: | Flanagan, Julia | |
| | 703-792-7208 | jflanagan@pwcgov.org |

The following items/issues were noted on your case. Please review and provide a letter responding to these comments, along with revised plans and proffers. Please be advised that staff might not identify all of the issues that arise during the case review and public hearing process. In addition, the solutions to the issues identified in this correction report might not be the only solutions, but are thought to be the most desirable solutions as determined by staff. Please note that any modifications will result in further review by pertinent agencies and staff, and could result in changes to the analysis and/or any recommendations.

Section I - Comments that Require Applicant's Response:

SEE ATTACHED

Section II - Questions/General Information:

SEE ATTACHED

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: February 21, 2022 (2nd 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 (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 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 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 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 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.
- 1.3 (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.
- 1.4 (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.

- 1.5 (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.
- 1.6 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 visual and environmentally 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 the Zoning Ordinance amendments. See the goals staff outlines below.

- 1.7 In their 2nd submission responses to staff's comments, the Applicant has provided some broad environmental protection concepts for the Comprehensive Plan, many of which are based on Watershed's first submission comments. In light of this, here are staff's recommendations of goals to achieve those broad concepts. As stated above these should be incorporated into a zoning text amendment:
 - a. Make the highest priority the establishment of substantial protected open space to include Environmental Resource (ER) Corridors as defined in the Comprehensive Plan and Natural Open Space for protection beyond what is defined as ER.

ER Corridors by definition would 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, marine clays, public water supply sources, critically erodible shorelines and streambanks.

Areas to be designated Natural Open Space (NOS) should include ER plus slopes of 15% and greater adjacent to significant non-RPA intermittent streams and perennial streams, and for habitat of rare, threatened and endangered species. The minimum NOS corridor should be a width of 500' from the edge of all perennial streams, with a NOS corridor of 50' from the edge of significant non-RPA streams where none of the above environmental features exist. (See EN-1.3, EN-1.5, EN-5.1, EN-5.3, EN-5.17, EN-5.19, EN-6.10)

- b. The recommended 500' corridors (above) will address the Applicant's stated desire to create effective wildlife corridors. See the Applicant's Proposed Plan Text in the 2nd submission application package dated January 18, 2022. By creating a consistent width of preservation and restoration along these stream valleys wildlife habitat principles of minimizing fragmentation, minimizing edge in relation to the forest interior, and preserving and restoring forested tracts for species that rely upon larger tracts of mature forest is possible. (EN-1.3, EN-5.3, EN-5.17, EN-10
- c. Some of the NOS created above is in need of restoration of natural resources and habitats such as native forest, meadows and streams. Where such resources have previously been impacted, Policy should positively state that restoration should be provided during development. (DES-13; EN-1.5).
- d. Seek commitments from applicants to provide funding for restoration of forest cover through existing County programs.
- e. 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.
- f. 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)
- g. Require a minimum of 20% natural open space on each development emphasizing preservation of existing forest cover and natural resources where they exist and restoration of forest cover where it does not exist.

II. Site Specific Concerns:

None at this time.

III. Conflicts with Minimum Development Standards:

N/A

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.

Rebecca Horner CPA #2021-00004 Page 6

Conclusion

As discussed in this letter, Fairfax County staff has significant concerns regarding the impacts that will accrue from adoption of this 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

BB: KMA

cc: Board of Supervisors

Bryan J. Hill, County Executive

Rachel Flynn, AIA, Deputy County Executive

Tom Biesiadny, Director, FCDOT

Chris Herrington, Director, DPWES

Leanna H. O'Donnell, AICP, Director, Planning Division

Michael Garcia, Chief, Transportation Planning, FCDOT

Catherine Torgersen, Planner IV, DPWES

Laura Arseneau, Chief, Heritage Resources and Plan Development Branch, DPD

Bryce Barrett, Senior Planner, Prince William County Planning Office