

September 23, 2022

The attached packet is provided for review and comment from the following agencies:

County Archaeologist (DS940)
Transportation Department (DS990)
Watershed Management (DS930)
Historical Commission

RE: CPA2021-00004, PW Digital Gateway - **Review # 5** **MAGISTERIAL DISTRICT:** 20 - Gainesville
COMPREHENSIVE PLAN AMENDMENT, AMENDMENT WITHOUT REZONING

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 Silver Lake Dam inundation Zone.

GPIN(s): 7499-70-3896	7499-73-5646	7498-94-1180
7498-84-6051	7499-82-1020	7499-72-1255
7499-51-0789	7598-13-2096	7498-74-6800
7498-85-7316	7498-93-7484	7499-81-6203
7499-50-2914	7498-85-3325	7499-92-7290
7498-51-1835	7499-84-1172	7499-83-4804
7498-83-6698	7498-93-5350	7499-62-5386
7498-94-5907	7498-42-6117	7499-83-9783
7498-83-1842	7498-83-1869	

Your comments should:

- 1) address the anticipated impacts of the proposal on the goals, policies and action strategies of the Comprehensive Plan;
- 2) address the anticipated impacts of the proposal on the services of your department;
- 3) address any site specific concerns which are materially relevant to the requested land use decision;
- 4) list minimum development standards which may conflict with the proposed development or require special consideration in the Planning Office's analysis of the proposal.

Your assigned Case Planner is **Alex Vanegas**. Please use **eReview** to submit your comments. Reviewers without eReview access should submit their comments by email to **amedina@pwcva.gov**.

Your comments should be directed to **Aisha Medina** and received no later than **September 23, 2022**. Your cooperation is appreciated.

The attached packet is provided for information only. No comment is necessary from the following:

SUPERVISOR - PETE K. CANDLAND
COMMISSIONER - RICHARD BERRY
BOARD CHAIRMAN - ANN B. WHEELER
COMMISSIONER AT LARGE - PATTY KUNTZ
ACTING PLANNING DIRECTOR - REBECCA HORNER
COUNTY ATTORNEY
ACTING COUNTY EXECUTIVE - ELIJAH T. JOHNSON
PLANNING COMMISSION CHAIRMAN - CYNTHIA MOSES-NEDD



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September 19, 2022

VIA ELECTRONIC DELIVERY

Alex Vanegas, Principal Planner
Prince William County Planning Office
5 County Complex Ct., Ste. 210
Prince William, VA 22192
avanegas@pwcgov.org

Re: PW Digital Gateway CPA #2021-00004

Mr. Vanegas,

This letter shall serve to forward information which we think is relevant to some of the misinformation being circulated among the community and to what additional Plan policies address the PC recommendations.


First, attached is a proposed policy recommendation that we think squarely addresses the Planning Commission recommendation that ***noise be adequately reduced and/or mitigated***. The attached Plan recommendation goes well beyond the current noise ordinances and Plan recommendations in Prince William, Loudoun and Fairfax counties. Unless and until such time as Prince William modifies its noise ordinance to specifically address data centers (this was put on Staff's Work Plan by the BOCS on July 12th), the application of this recommendation to future rezonings within the Digital Gateway will remove noise as a legitimate concern of neighboring residents.

Second, attached are two additional policy recommendations for the Green Infrastructure section of the Plan. These will help ensure that ***proper measures are taken to address any negative environmental issues***. We also attach a summary of the robust environmental mitigation measures which are already contained in Staff's Plan. These measures go well beyond both what we originally proposed and current ordinance requirements. They provide meaningful and measurable specific policy guidance to be applied in future rezonings and site plan review. We note that these same additional environmental protections are not applicable to other areas within the county that drain to the Occoquan Reservoir, including the Data Center Opportunity Zone Overlay District – perhaps they should.

There has been a lot of deliberate misinformation concerning the Planning Commission recommendation, especially regarding points that QTS and Compass have discussed with Staff since July.

The PC recommended that the BOCS adopt certain specific clarifications and modifications to Staff's Plan, which were outlined in a letter sent September 10th to County Staff and all of the PC members. These changes recommended by the PC to Staff's Plan are:

1. Encourage electric substations to be located only interior to data center development clusters or directly adjacent to the existing high voltage line corridor.
2. At the time of rezoning, perform studies to determine whether specific historic resources warrant preservation, according to accepted County policies (e.g., the Historic Preservation Collections Management Policy – effective 7/1/2015).
3. At the time of rezoning, determine, on a site specific basis, the exact alignment and width of the Open Space Wildlife Corridors shown in the Plan (Figure 13).
4. Establish and protect all existing wildlife corridors located along the ER designated land shown on Figure 13. The proposed, but currently non-existent, wildlife corridor section that traverses 5 residential homesites shown on the attached map is not recommended by the PC. There is no mapped ER land within this non-existent short segment of proposed wildlife corridor.
5. The intersection spacing recommended in the Plan should match VDOT minimum requirements for the Plan's 45 MPH speed limit designation of Pageland Lane. A connection to I-66 should not be recommended for further study.
6. The use of stormwater runoff Best Management Practices should be linked to a goal of reducing peak flow runoff from developed sites to no more than the runoff which was generated 200 years ago when the entire area was in a "good-forested condition." In addition, "Areas of Reforestation" should be specifically encouraged in the Plan to reduce runoff and erosion.
7. Remove the Open Space designation from only a 15-20 acre portion of the 60 acres east of the Power Lines so that 40-45 acres would remain open space and buffers. Electric connections to the existing abutting power lines are best located within this 15-20 acre secluded area which abuts the existing high voltage lines.

Sincerely,

John L. McBride

Attachments

cc: Meika Daus
Rebecca Horner
David McGettigan
Nick Blessing, QTS Data Centers
Paul Bradford, QTS Data Centers
Chris Curtis, Compass Data Centers
Mary Ann Ghadban
Antonio J. Calabrese, DLA Piper
Jonelle Cameron, Walsh, Colucci, Lubeley & Walsh
Mark Looney, Cooley, LLP

Environmental Protection

New Recommendations – DGGI 1.12 and 1.13

DGGI 1.12 Stream Monitoring – new long-term stream monitoring sites along Little Bull Run and Licks Branch should be established by the County in consultation with any third party Conservation Easement holders and the Occoquan Watershed Monitoring Laboratory (“OWML”).

DGGI 1.13 Additional Open Space – In addition to preserving or enhancing the areas generally designated as Parks and Open Space on Figures 5 and 13, individual rezoning applicants are encouraged to identify within the boundaries of each application additional areas that may be preserved or enhanced, such as through expanded buffers, open space above the minimum ordinance standards, and tree preservation/reforestation areas.

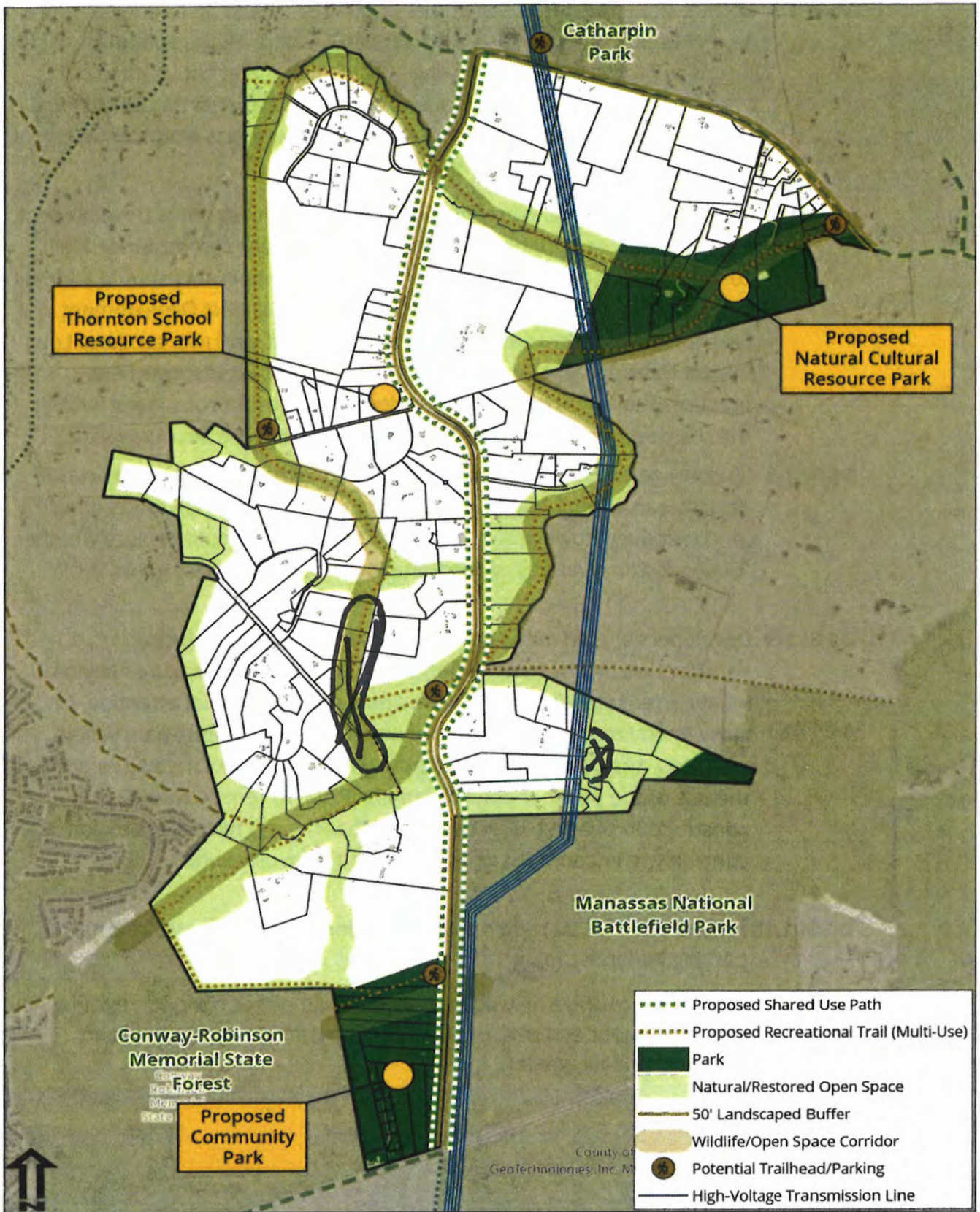


Figure 13: PW Digital Gateway Green Infrastructure Map

Measures to Address Environmental Protection

The CPA recommends the following:

- Open Space – 800 acres of permanent open space (parkland, buffers, protected Environmental Resources areas, and Pageland Lane streetscape areas). Of the 800 acres, 370 acres will be designated for future parkland. This area is currently private property unavailable to the public.
- Conservation Easements – to preserve and protect public and private natural open space areas.
- Existing Wildlife Corridor Protections – well established & carefully protected primary wildlife corridors will be protected and preserved (along with a bridge under Pageland) to establish greater wildlife connectivity.
- Restoration of disturbed areas to native forests, wetlands, and meadows.
- LIDs – utilization of low impact development designs to address and enhance water quality.
- Erosion & Sedimentation Control – Plan recommendation incorporates the most rigorous standard in NVA.
- Removal of contaminants – removal or abandonment of existing wells and septic systems.
- State of the Art Closed Loop Cooling Systems – utilization of closed loop water or no-water cooling systems – new data centers use dramatically improved, alternative cooling systems – an exponential reduction in water usage compared to older open/evaporative tower water-cooling systems. Both Applicants utilize closed-loop, hybrid, fan cooling, or zero-water cooling systems within their data center facilities, which reduce dramatically the use of public water and sewer service. By way of example, a closed-loop data center of 250,000 square feet often uses the equivalent water and sewer of 2–3 single-family homes.
- Detailed and Effective Sustainability Initiatives – such as and not limited to: (1) reduce heat island effect, (2) reduce, control, and treat surface runoff beyond minimum standards, (3) onsite renewable energy, (4) heat reflective roofing, (5) sustainable building materials during construction, (6) capture reclaimed water for non-potable use, (7) minimize use of sodium and chloride during winter months, (8) indoor environmental quality, and (9) Design PUE or Green Globes to achieve energy efficient building designs and operation standards.
- Unique Water Quality Protection Measures, Requiring and Enforcing a “Good Forested Condition” Standard – the Applicants propose to reduce the peak rate of storm water discharge and achieve water quality outcomes equivalent to “good, forested conditions.” Under this approach, stormwater facilities for sites that currently are forested would be designed to release peak flow storm runoff at a rate no greater than its present (forested) condition, while stormwater facilities for sites that previously have been farmed or developed with housing units will be designed to return the rate of storm runoff to that which existed prior to the site

being developed and/or farmed. The same would be true for the quality of storm runoff that is released downstream. Both of these standards exceed current state and County regulations for the treatment of storm runoff.

- Minimize Use of Sodium and Chloride through closed loop or air-cooled systems and through preparation of a winter management plan by Data Center operators, which is based upon the VA DEQ model.
- Current Agriculture and Uncontrolled, Unregulated Uses – a large portion of the DG Corridor currently contains open land, which routinely is treated with pesticides, fertilizers, and other chemicals. The area also contains over 100 long-standing residential septic systems that will fail and pollute the County's nearby waterways at some point in time. Nutrient and manure runoff also is uncontrolled, reflective of the current, by-right Agricultural/Estate zoning. Additionally, three nearby golf courses that drain to Little Bull Run are treated with herbicides and insecticides. Should the CPA be approved by the Board, and rezoning applications later approved, there will be significantly more, site-specific review and regulation of storm runoff from the DG Corridor than occurs today. Therefore, as a result, the water quality will be equal to or better post development than its current condition.

Noise Mitigation

Suggested Replacement Language to DGCD 1.9:

Noise sources located on data center sites, including, but not limited to, generator equipment, backup power sources and heating and cooling system(s), should not generate daytime noise levels in excess of 65 dBA and nighttime noise levels in excess of 60 dBA, as measured at the property boundary of any land planned for CRHS or residential use. These sound studies should be submitted with site plan submission to ensure compliance. Sound studies should include specific recommendations on any mitigation measures necessary to meet these noise levels, such as, but not limited to, (i) site orientation and setbacks, (ii) building configuration, (iii) sound attenuation enclosures, berms or walls around generators and other mechanical/cooling system equipment, and (iv) strict times for industry required testing of generator equipment and backup power systems. The use of solar or battery-powered back generators is encouraged to reduce noise.