



United States Department of the Interior

NATIONAL PARK SERVICE
Prince William Forest Park
18100 Park Headquarters Road
Triangle, VA 22172-1644

In reference reply to:

1.A.1.

November 16, 2022

Marian Harders
Walsh, Colucci, Lubeley & Walsh, P.C.
4310 Prince William Parkway
Suite 300
Prince William, VA 22192

RE: REZ2022-00015, POTOMAC TECHNOLOGY PARK
SUP2022-00016, POTOMAC TECHNOLOGY PARK

Thank you for the courtesy and opportunity to provide feedback on the proposed rezoning and special use permit application concerning Potomac Technology Park in the Potomac District. As we have stated previously, the Prince William Forest Park, as a unit of the National Park Service, is opposed to these proposed actions. Furthermore, we believe it is premature to proceed with this rezoning and special use permit application while the study commissioned by the County to further review expansion of the Data Center Opportunity Zone Overlay District (DCOZOD) is on-going. The contractor recently submitted their recommendations for the DCOZOD, and this parcel is notably absent from their recommendations, suggesting that the data center use of this parcel is completely incompatible with the site conditions.

Should this proposal continue on the proposed path of development, the following comments should be taken into consideration. The protection of Quantico Creek and its watershed is a fundamental resource value to the mission of Prince William Forest Park. This rezoning request proposes wholesale destruction of forest cover over several drainages that feed the upper headwaters of Quantico Creek, and the proposed development for a data center and/or other uses will require reengineering of terrain that will rewrite the existing natural headwaters system.

Specific to this rezoning and SUP request, we find little information that addresses several key concerns: future disposition and protection of undeveloped open space; impacts on neighboring parcels; and any substantive environmental analysis about the impact of the loss of 50+/- acres of mature upland forest.

In addition to our above statement, we are concerned with the existing site development plans regarding steep slopes, wetland and stream protection, site lighting, and stormwater management.

This parcel is not suitable for development as proposed, with nearly six acres of county designated Environmental Resource (ER) is proposed for clearing and grading. This includes forests covering steep slopes with highly erodible soils that qualify as ER. This is inconsistent with the following

Comprehensive Plan policies and action strategies: EN-5.3; EN-10; DES-12.1, 12.3.

The westernmost intermittent stream has a well-defined drainage way indicative of active and regular water flows. It is a contributing source of hydrology to a downstream wetland. The classified ER designation on either side of the stream (forested steep slopes with highly erodible soils) currently protect the quality of this stream. The current plan is proposing to clear the ER and stream above the classified Resource Protection Area. EN-5.1 calls for protection of the ER on either side of these streams.


As stormwater events have increased in frequency and intensity in recent years, and are likely to continue, Prince William Forest Park requests that all stormwater management and retention facilities be designed to accommodate at least 200% capacity in excess of required design requirements as required by existing regulations and stored on-site. Prince William Forest Park and its resources and visitors should not be impacted by water trespass from this site during and after the proposed development. All stormwater facilities should be serviced annually or more frequently as required by existing regulations and be subject to county inspection on an annual basis.

All lighting, including building-mounted lighting shall be directed downwards to prevent light trespass beyond the site.

The generation of noise by such uses as a data center should be reduced and should not be audible beyond the site boundary.

There has not been an analysis or mention of impacts to air quality from the future operation as a data center. How will emissions of noxious fumes, gases, and particulate matter be addressed? Prince William County is currently within an EPA designated area for non-attainment of air quality standards. This proposed development will further contribute to this issue unless addressed in the planning stage.

Sincerely,

A handwritten signature in blue ink, appearing to read "George Liffert". The signature is stylized and cursive.

George Liffert
Superintendent

cc: cperez, pwc planning