



September 13, 2022

Via email to: ClerkPC@pwcva.gov

CC: planningatlarge@gmail.com, colesplanning@gmail.com, riccar1110@aol.com,occoquanplanning@gmail.com, jmcpcwcommission@gmail.com, PlanningWoodbridge@gmail.com, tom@tomgordy.com, neabscoplanning@gmail.com

Prince William County Planning Commission
1 County Complex Ct.
Prince William, VA 22192

Dear Members of the Planning Commission:

I am writing to you today on behalf of the Audubon Naturalist Society (ANS), Washington, D.C. region's oldest independent environmental organization. Our conservation priorities are human health & access to nature, biodiversity & habitats, fighting the climate crisis, and sustainable land use. On behalf of our over 28,000 members and supporters, in our conservation advocacy we prioritize human health & access to nature, biodiversity & habitats, fighting the climate crisis, and sustainable land use.

ANS urges the Planning Commission to deny the Comprehensive Plan Amendment #CPA2021-00004, PW Digital Gateway. The proposal to bisect the protected areas of Conway Robinson State Forest and Manassas Battlefield National Park and remove over 2,100 acres along Pageland Lane from the Rural Crescent in order to develop data centers is inconsistent with the need to address the climate crisis. This proposal puts our region's climate goals and health at risk. Our key concerns are listed below.

Greenhouse Gas Emissions are *Increasing* in Prince William County

The Metropolitan Washington Council of Governments' (COG) reports that greenhouse gas emissions in Prince William County rose a stunning 19 percent between 2005 and 2018, almost exclusively due to a continued increase in commercial energy usage¹, and almost certainly due to data center usage. This increase is even more shocking when compared to the broader region's overall *decrease* in greenhouse gas emissions of 13 percent in that same time period².

¹ <https://www.pwcva.gov/assets/2022-06/Climate%20Planning%20Presentation%20for%20PWC%20EC.pdf#page=19>

² <https://www.mwcog.org/environment/planning-areas/climate-and-energy/greenhouse-gas-inventories/>

The PW Digital Gateway Ignores Negative Climate Outcomes

In order to achieve the emissions targets set by COG in October 2020 and endorsed by Prince William County, the county will need to reduce emissions at least 58% from its 2018 levels. The two biggest sectors that must be addressed are commercial energy usage and transportation: the very two sectors this plan would ultimately end up *expanding* through poor land use planning and data-center sprawl.

The PW Digital Gateway's Sustainability section³ proposes policies to *mitigate* the production of greenhouse gasses that will result from the electricity use generated by this plan. The policies are inadequate and fall short on recognizing the broader need of an overarching plan to first *avoid*, not mitigate, negative climate impacts. Beyond electricity use, the plan completely fails to address the carbon emission increases from the transportation sector that will no doubt result from a significant increase in traffic to this area.

The PW Digital Gateway Ignores the County's Current Land *Already* Designated for Data Centers

The PW Digital Gateway's proposal to replace 2,100 acres of the Rural Crescent with industrial land use lacks long-term vision and smart climate planning, particularly when the county already has over 1,800 acres *already designated* in the 8,700-acre Data Center Opportunity Zone Overlay District for development of data center uses⁴. It is outrageous to push this plan forward in the face of existing opportunity and without first establishing a climate action plan that addresses the need for smart land use planning.

The current Data Center Opportunity Zone Overlay District contains the infrastructure needed to support its uses, such as roads and power lines. Building data centers *outside* of this area today will cause irreparable harm and undermine the ability to think carefully and constructively about how Prince William County can best grow as a community facing the current climate crisis.

The PW Digital Gateway Puts Drinking Water Quality at Risk

The PW Digital Gateway development will have direct and long-lasting impacts on the watershed draining to the Occoquan Reservoir, a primary source of drinking water for Northern Virginia residents. Intense development, such as what is proposed through this plan, brings increased pavement and runoff and potentially significant water withdrawals for data center cooling. While low-impact development methods must be the new standard in all development, new impervious surfaces inevitably contribute to water pollution. Prince William County must work to avoid the risk of increased pollution in our drinking water, particularly of salt. Not only can road salts (from new

³ https://www.pwcva.gov/assets/2022-08/Draft%20Plan_PWDigitalGateway%20webversion_2022_0815_FINAL.pdf#page=43

⁴ <https://www.pwcva.gov/assets/2022-01/Frequently%20Asked%20Questions.1.20.22.pdf#page=8>

roads and parking lots) contribute to this issue, but data center cooling systems that use salt as a disinfectant are a significant concern as well.⁵

Simply put: This development plan adds unnecessary risk to an important water supply already at risk from increased development. With current land *already* designated for data center development, the county must avoid undue expansion of this type of land usage.

The PW Digital Gateway Fails to Sufficiently Address Wildlife and Habitat Impacts

The PW Digital Gateway's Green Infrastructure section⁶ attempts to address concerns raised regarding impacts to wildlife. However, the plan's lack of specificity in defining which wildlife exists today, which should be protected, which is being prioritized for the defined "corridors" is left to the reader's imagination. The document never mentions habitat - a critical component to understanding the area's wildlife and ecological value of the existing natural areas.

Of particular concern are the hundreds of acres of forest on the western edge of the project area north of Artemus Rd and around the Haddonfield Lane loop which are slated to be erased from the Rural Crescent. As we face the current climate crisis, existing intact forest remnants must be preserved and improved to allow maximum carbon sequestration as well as the ecological value of their habitat.

Wildlife *corridors* exist where current *habitat* exists. Some wildlife, such as white-tailed deer, may be able to adapt to a different corridor. However, other more habitat-specific species, such as turtles and salamanders, will not have the ability to adapt in disconnected, altered, or degraded corridors.

Any comprehensive plans put forth in the county should seek to protect natural resources first and foremost and the plan for doing so should be created in partnership with a wildlife biologist⁷.

In Conclusion

This and *any* Comprehensive Plan Amendment with such potential significant climate impacts *must not be approved* in advance of broader climate planning. While ANS applauds this year's hiring of Ms. Giulia Manno, Prince William County's first Environmental and Energy Sustainability Officer, we urge the county to work *with*, not against, Ms. Manno and her office.

⁵ https://www.bayjournal.com/news/pollution/will-data-centers-imperil-drinking-water-in-northern-virginia/article_a9121a34-f6e8-11ec-b5c7-e7dcc17f86bd.html

⁶ https://www.pwcva.gov/assets/2022-08/Draft%20Plan_PWDigitalGateway%20webversion_2022_0815_FINAL.pdf#page=32

⁷ https://www.pwcva.gov/assets/2022-08/Memo%20to%20PC-%20QA%20PW%20Digital%20Gateway%20WS%2008.19.22_V3%20Final.pdf#page=4

Ms. Manno has been tasked with presenting recommendations for Prince William County's climate action plan to the board by July 2023. In order to attain regional climate commitments, ANS urges the county to avoid making large-scale changes to the Comprehensive Plan in advance of more climate planning. Approving this plan without considering its impacts within the broader framework of climate action plan will make reaching both the county's and the region's climate goals that much harder to reach.

ANS urges the Planning Commission to deny the Comprehensive Plan Amendment #CPA2021-00004, PW Digital Gateway.

Renee Grebe

A handwritten signature in black ink that reads "Renee Grebe". The signature is written in a cursive, flowing style.

Renee Grebe
Northern Virginia Conservation Advocate
Audubon Naturalist Society