



AUDUBON SOCIETY
NORTHERN VIRGINIA

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January 25, 2022

The Honorable Ann Wheeler, Chair, and
Members of the Board of Supervisors
Prince William County
via email

Re: Proffer Amendment and Rezoning #REZ2022-00001, Belmont Bay Special Use Permit
#SUP2022-00002

Ladies and Gentlemen:

I write on behalf of the more than 5,000 members of the Audubon Society of Northern Virginia (“ASNV”) regarding the subject application. The mission of ASNV is to engage northern Virginians in enjoying, conserving and restoring nature for the benefit of birds, other wildlife, and people. We are writing to you regarding the proposed new development in Belmont Bay out of concern for its potential adverse impact on the Occoquan River and Occoquan Bay National Wildlife Refuge (“the Refuge”).

The River, Occoquan Bay, the Refuge and nearby refuges are all part of the Lower Potomac River Important Bird Area (“IBA”), which includes the tidal fresh/brackish reach of the Potomac River in Fairfax, Prince William, Stafford, and King George Counties. The area was designated by BirdLife International and many partners, including ASNV and the National Audubon Society. Addition to the IBA program acknowledges the area’s significance not just to bird life in the immediate area but nationally and internationally.

Our concern with the proposed additional development in Belmont Bay arises from the intensive use planned for the area and the elimination of open space, particularly in area adjacent to the Occoquan River and the Refuge. Eliminating green space and open space, replacing it with buildings and other impervious surfaces destroys habitat for birds and other wildlife and has adverse environmental consequences for people. Mature trees and other vegetation act as carbon sinks and provide natural cooling, which helps address climate change. Replacing open space with impervious surfaces also reduces natural absorption of stormwater, increasing runoff, as well as contamination associated with urban runoff. We outline some specific concerns below.

Loss of Open Space

We agree with the October 1, 2021 comments of the Planning Office that open space dedicated to the development is inadequate. The proposed development is an expansion on existing

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development in the area. Because the development would rezone and use some of the open space associated with the existing development, any calculation of open space should be calculated as at least 30 percent of all built portions of Belmont Bay AND the area to be rezoned.

Restoration of the RPA

ASNV is also concerned that the plan does not, according to September 3, 2021 comments from the Watershed Management Branch, commit to restoration of all segments of the Chesapeake Bay Resource Protection Area (“RPA”) within the development. ASNV is particularly concerned regarding the RPA in Riverfront Park, which should be restored in its entirety. Portions of the area were golf course, and they should be restored to natural conditions, including soil restoration and planting with native plants.

Buffer Adjacent to the Refuge

We also are concerned about the proposed reduction in the 75-100-foot buffer along the southern boundary adjacent to the Refuge. The proposed 20- and 25-foot buffers are inadequate to protect the valuable natural resources in the Refuge from sedimentation, invasion of non-native plants into the refuge from adjacent development. ASNV recommends maintenance of the existing buffer or reduction of the buffer to no less than 50’ from the Refuge and the Potomac Heritage Trail.

Stormwater Management and Floodplain Considerations

The extremely high-density development proposed for portions of the Marina District (more than 30 dwelling units per acre) with no planned open space is a concern because of the cumulative impacts to the Occoquan Bay watershed. Because existing development in both Fairfax County and Prince William County has been restricted to lower-density uses, overall stream habitat condition is good to excellent. However, the proposed intensive development, which is buffered only by the Riverfront Park, could reverse that trend. In its September 24, 2021 letter concerning the proposed development, the Fairfax County Department of Planning and Development cites data indicating that when impervious area reaches 7.5 percent, there is a significant impact on the biological community in nearby waterways.

If the plan continues to include the projected level of impervious surface, stormwater management plans should include controls to minimize runoff of pollutants, including buffer areas, riparian restoration to re-establish additional streamside buffers, and requiring “living shoreline” controls for shoreline stabilization. The proposed dog park may need to be relocated unless the project can guarantee controls protecting both surface and groundwater from animal waste.

Native Plants and Bird-Friendly Design

Because the proposed development is in an area important for both native and migrating birds, ASNV encourages a project plan that includes a commitment to require enhanced tree canopy as well as use of native plants in landscaped areas. Trees help mitigate the heat island effect caused by development and impervious surfaces. Native plants in project landscaping provide valuable habitat for wildlife (insects and birds) displaced by development. In addition, because of the proximity to the Refuge and the entire project’s location within the Lower Potomac IBA, ASNV recommends that project buildings employ bird-friendly design. Measures that protect native wildlife include bird-friendly glass, non-transparent glass, high-reflectivity roofing materials,

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green roofs and lighting that reduces light pollution. Light sources should avoid up-lighting or spill and, except where required by public safety requirements, use warm-toned, amber or filtered light sources.

If you have questions about these comments, please contact me at connie.ericson@verizon.net or via the ASNV website at <https://www.audubonva.org/connie-ericson>. ASNV appreciates your consideration of its views.

Sincerely,

A handwritten signature in cursive script, appearing to read "Connie Ericson".

Secretary, Chair Advocacy

Cc:

Prince William County Planning Commission, clerkPC@pwcgov.org

K. P. Lau, Belmont Bay HOA, kplau@belmontbayHOA.com