

Sep 5, 2024

Chair Jefferson and Board of County Supervisors 1 County Complex Ct. Prince William, VA 22192

Subject: Comments regarding Belmont Bay REZ2024-00040 and SUP2024-00036

Dear Chair Jefferson and Members of the Board of County Supervisors:

In reviewing the Belmont Bay rezoning request #REZ99-0022 & a SUP Amendment for SUP99-0001 to modify the land bays for the development of 358 SFA units (284 age-restricted) & to reduce the remaining commercial uses to 15,000 sq. ft, we, the organizations listed below, are concerned about negative impacts to the Occoquan Bay National Wildlife Refuge. We urge the Prince William County Board of Supervisors to require a 100-foot buffer between the planned development in these matters and to require that the 30% open space obligation be calculated independent of any previous developments' open space commitments. The Belmont Bay area's environmental assets are too important to fall victim to encroaching development.

The Belmont Bay community has the potential to showcase work-live-play town center design with a regional appeal. To realize this potential, protecting the natural assets that make that area such a draw in the first place is key. The waterfront and the Occoquan Bay National Wildlife Refuge are cornerstone to this community's appeal and thus adequate stormwater and buffers are a critical part of any development, especially here in such an environmentally sensitive area.

The Occoquan Bay National Wildlife Refuge, a 644-acre refuge located at the confluence of the Occoquan and Potomac Rivers, is an outstanding place to watch wildlife in any season and is a critical natural asset to our community. The Refuge boasts a remarkable diversity of wetlands covering about half of its area, which include wet meadows, bottomland hardwoods, open freshwater marshes, and tidal marshes. Interspersed among these wetlands are upland meadows and mature oak-hickory-beech forests, creating a mosaic of habitats that are invaluable to a wide range of wildlife species.

The refuge's diverse and well-arranged habitat types provide unique opportunities for wildlife watching. Over 600 plant species have been inventoried in twenty distinct vegetative habitats by volunteers from the Virginia Native Plant Society. The Northern Virginia Bird Alliance (previously the Audubon Society of Northern Virginia) and other organizations have documented 237 bird species, 74 butterflies, and 61 dragonflies over the past two decades. Additionally, the refuge is home to endangered species like the long-eared bat as well as the tri-colored bat, which is

recommended to be listed as endangered. Protecting these species and their habitats is crucial, and we must ensure that any development in the area respects and preserves this unique ecological landscape.

We strongly urge a 100-foot buffer to be maintained between the Refuge and the development in order to better protect wildlife whose habitats are shrinking in our region and the experiences of visitors that come to birdwatch and enjoy our nearby nature. The 100-foot buffer is consistent with existing legislation that protects perennial streams and the Chesapeake Bay, making it a reasonable and necessary measure here as well.

Moreover, we recommend that the requirement for 30% open space within the development be calculated independently from any previous developments to prevent the double counting of open space. Current residents must keep the open space that was promised to them as the community grows and welcomes additional residents and businesses. The 105 acres of open space that the applicant claims to be preserving were already designated as part of the golf course and previously committed as open space. While transferring some of this land to the county, which may protect it from future development, is a positive step, counting the same land twice for open space credit undermines the intention of that requirement.

Additionally, we encourage the open space requirement to be "natural open space", as 'open space' also includes impervious surfaces like parking lots. Given that much of the existing open space consists of the golf course, this presents an excellent opportunity for a reforestation effort that could benefit both the environment and the community.

The Belmont community has the potential to be a model of urban mixed-use development, with a vibrant town center that residents and visitors alike can enjoy. Protecting the natural assets here is an integral part of that model. To achieve this vision, adequate stormwater management practices and buffers must be established and upheld.

Thank you for considering and integrating these simple recommendations, which promote the long-term benefits of preserving the natural resources that make our community special.

Thank you for your time and consideration.

Sincerely,

Ashley Studholme Executive Director, Prince William Conservation Alliance

Kyle Hart Mid-Atlantic Program Manager, National Park Conservation Association

Tom Blackburn Advocacy Chair, Northern Virginia Bird Alliance Claudia Thompson-Deahl Conservation Chair, Prince William Wildflower Society

Nancy Vehrs President, Virginia Native Plant Society

CC: Chris Shorter, County Executive Mark Scheufler, Planning Commissioner Karla Justice, Planning Commissioner Blake Ross, Planning Commissioner Raheel Sheikh, Planning Commissioner Juan McPhail, Chair Planning Commissioner Cynthia Moses-Nedd, Planning Commissioner Christopher Carroll, Planning Commissioner Qwendolyn N. Brown, Vice-Chair Planning Commissioner Vanessa Watson, Planner Alex Venegas, Assistant Planning Director Tanya Washington, Planning Director