

The Town of  
**Leesburg,  
Virginia**

JOHN WELLS  
Town Manager

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May 13, 2009

Judi Birkitt, Project Manager  
Loudoun County Department of Planning  
1 Harrison Street, SE  
P.O. Box 7000  
Leesburg, VA 20177

**RE: Referral request for a special exception and Commission Permit SPEX 2009-0009 and CMPT 2009-0001, Hybrid Energy Park at Stonewall Secure Business Park, to allow a utility generating plant and transmission facility.**

Dear Ms. Birkitt:

We are in receipt of the referral request for first submission of the above referenced project, and we are pleased with the opportunity to provide you with the following comments:

**Recommendation:** The Town feels that this first submittal application at this time does not provide enough critical information on the project to be able to garner a positive recommendation. The issues that the Town feels need to be addressed are indicated below.

**Description of the Proposal:** The applicant is proposing a special exception and a commission permit for the development of a utility generating plant and transmission facility on 87 acres south of Sycolin Creek and east of Sycolin Road. The applicant is proposing to build a primary and peak demand facility including up to a 600 megawatt combined cycle gas turbine-waste water energy plant, up to two 150 megawatt simple cycle peaking power natural gas turbines, and a 1 megawatt solar array. The energy plant is proposed to be part of the Stonewall Secure Business Park that is the subject of a proposed rezoning of 294 acres, located south of Leesburg generally in the vicinity of the intersection of Sycolin Road and Cochran Mill Road. The rezoning entails a proposed change from JLMA 20 to Planned Development-Industrial Park (PD-IP) and Planned Development-General Industry (PD-GI). The energy plant will provide power to the energy grid, and serve as a redundant source of energy for the secure data center and high technology business park. The site is in the Transition Zone of the Loudoun County Revised General Plan.

The Stonewall Business Park proposal is currently on a separate track than this proposal. Approval of the business park project would have to precede approval of this proposal, in order to provide a zoning framework to allow approval of this project.

**Analysis and Recommendations:** The following analysis is based on comments from several Town departments. The complete Town departmental comments are attached. The review was undertaken with regard to a number of subject areas, including land use, utilities, and environmental. This review is based on “Stonewall Secure Business Park: SPEX 2009-0009, CMPT 2009-0001” (4 sheets, last dated March 30, 2009), “Statement of Justification: Hybrid Energy Park, Stonewall Secure Business Park” (last dated March 25, 2009), and “Draft Conditions of Approval: Hybrid Energy Park, Stonewall Secure Business Park” (dated March 30, 2009).

It should be noted that the application does not appear to specify any design criteria, including the height of any stacks or venting apparatus. The applicant has stated that the stacks would not exceed approximately 130 feet in height, but there is no commitment to that within the application. This is a significant area of concern for the Town, in addition to the types and quantities of materials vented from said stacks, and needs to be addressed with subsequent submittals.

### **Land Use:**

The majority of the site of the proposed zoning amendment and special exceptions lies beyond the Leesburg joint planning area (referred to in the Town Plan as the UGA/JLMA). Nevertheless, the site is immediately adjacent to the joint planning area, and the proposed development could have substantial impacts on the area and the Town.

### **Conclusions:**

- 1. Application.** The statement of the justification for the power plant states that the plant will be a redundant source of energy “necessary for high tech and data center reliability.” (p. 3) Similarly, the statement of justification for the Stonewall Secure Business Park states that it is “crucial to a secure business park” to have redundancy and resiliency of infrastructure, including “uninterrupted power system by multiple sources.” (p. 4) However, the applications for the power plant and the secure business park have been submitted separately. It would seem appropriate to consider the two proposals jointly, in order to assess them properly.
- 2. Transition Policy Area.** Leesburg’s planning has relied on development to be in accordance with the Revised General Plan’s Transition Policy Area designation for the area south of the Town. The proposal, as a necessary part of the Stonewall Secure Business Center, does not appear to comply with the policies for the Transition Policy Area because of the type of use (nonresidential), intensity of use (0.6 FAR), and provision of central sewer and water proposed in the business center. Nor does the application address possible aspects of an energy plant, such as noise, vibrations, and visibility of cooling towers. An intensive,

industrial use is not consistent with the clusters, rural villages, or nonresidential uses envisioned for the Transition Policy Area (Revised General Plan, Transition Policy Area, Community Design policies 2 and 15, pp. 8-6 and 8-7); and it seems far from the “more rural character” (RGP, p. 8-5) envisioned for the Lower Sycolin Subarea of the Transition Policy Area.

In particular, Leesburg Joint Land Management Area Policy 3 states, “Power generation plants are not compatible with existing residential areas within or near the Town JLMA, and therefore, are not allowed in the Leesburg JLMA.” (p. 9-11) In addition, objective 4 of the community facilities and services element of the Town Plan states, “Locate and construct community facilities in regard to other Plan policies, including compatibility with the Town character, and protection and enhancement of residential areas, natural resources, and heritage resources.” (p. 83) Policy 3 of the Revised General Plan was written in response to a previously proposed power plant within the JLMA; that plant was to be powered by fuel oil with towers several hundred feet tall. Virtually all the site of the currently proposed plant is outside of the JLMA. On the one hand, since the site is located at the boundary of the JLMA, it would be appropriate for the county to consider carefully the applicability of its prohibition of power plants to this site. On the other hand, if the applicant can demonstrate that the proposed plant will not have adverse air, water, energy, and aesthetic impacts, it may be worth considering the plant’s acceptability in light of growing demands for electric power and the need for distributed, efficient power generation.

3. **Greenbelt.** The Revised General Plan calls for a greenbelt around the Town (Leesburg Joint Land Management Area Policy 4.a, p. 9-12). The proposal does not include any specifics about preservation of the greenbelt. The Town requests that greenbelt be accommodated in development of the site.

4. **Transportation.**

a. The proposal does not include any specifics about improvements to the road system abutting the site. The Town Plan’s Road Network Policy Map (which coincides with the Revised Countywide Transportation Plan) calls for Cochran Mill Road (Rt 653) to be a 4-lane, undivided through collector. According to the Town Plan, Cochran Mill Road should be relocated out of the floodplain of Sycolin Creek by crossing Sycolin Creek and traversing the site before intersecting Sycolin Road.

b. The proposal does not include any specifics about improvements to the bicycle/pedestrian facilities abutting the site. The Town Plan’s Bicycle/Pedestrian Facilities Policy Map shows a multi-use path along Sycolin Creek.

**Traffic and Transportation:**

The various issues surrounding traffic and transportation for this project must be addressed through the Stonewall Secure Business Park application. This particular use will have an impact

on the Stonewall application, by creating a land use that produces significantly less traffic than other PD-GP uses that could be proposed for the location.

Staff will be awaiting the second submittal of the Stonewall Secure Business Park application to fully analyze the total impacts of development related to the total acreage of the Stonewall Secure Business Park and all of its uses.

### Utilities:

One of the main issues surrounding this application is that of the statements related to the Town of Leesburg providing effluent from our treatment facility to be utilized by the power facility. Any action regarding this part of the proposal must be endorsed by the Town Council.

### Conclusions:

1. It is not known how this facility will be served by public utilities as indicated within the application.
2. It is not known how the state agencies will react to the use of treated effluent from the wastewater operation in this process. The applicant must discuss the steps taken so far to address this issue.
3. It is not known how the effluent from the Town's facility will be conveyed to this facility..
4. This proposal must be endorsed by the Town Council before the applicant proceeds any further on this application

### Environmental:

The proposed power plant facility has the potential to reduce impacts on the regional and global environment. The applicant needs to provide additional detail and commitments on how they will minimize and mitigate noise and lighting pollution as well as impacts to local water, air, and other natural resources. And while tentatively recommending approval, specific issues related to the environmental impacts must be addressed through the state and local permitting process.

Of specific concern to the Town, other than listed below, is the amount and types of emissions from the venting of this project, and its impact on the local populace. We would strongly recommend that the Town be kept informed of any permitting process from agencies and jurisdictions outside of Loudoun County.

### Conclusions:

1. **Energy Production:** According to the U.S. Governmental Energy Information Administration, coal-fired power plants account for about one-half of the Virginia's

electricity generation and nuclear power plants account for another approximately one-third. Natural gas and petroleum-fired power plants account for most of the rest. According to the International Energy Association, 37% of the world's man-made carbon dioxide emissions result from electricity generation. Carbon dioxide is the primary gas in greenhouse gases, which contribute to the greenhouse effect and related climate change. Coal-fired power plants produce more carbon dioxide than any other method of generating electricity and are one of the largest contributors to emissions of smog-producing air pollutants. Further, the International Energy Agency reports that coal-fired plants are the least efficient of the methods for producing electricity.

A significant portion of the electricity used in Leesburg is produced from inefficient, high-polluting coal-fired power plants. The proposed combined cycle natural gas power plant will provide electricity at nearly twice the efficiency of coal-powered plants while producing less than one-half of the carbon dioxide, and much smaller fractions of other greenhouse gases (NO<sub>x</sub> and SO<sub>2</sub>). While solar and wind energy production are even cleaner and more sustainable ways to produce electricity (they do not deplete non-renewable resources such as oil, gas, and coal), the proposed natural-gas facility is as clean and efficient as is available from fossil fuel-based power plants. Considering the strategic location of the site along major gas and electric transmission lines, it makes sense to develop a combined cycle natural gas power plant here. Moreover, on a regional scale there will be environmental and natural resource benefits of the area reducing its dependence on electricity produced by coal-burning power plants.

2. **Air Resources Impacts:** Air resource impacts will be monitored and regulated by the Commonwealth of Virginia. I recommend that the applicant provide information on how the facility will be designed to minimize impacts to air resources through the use of advanced emissions controls such as a Selective Catalytic Reduction System to reduce nitrogen oxides and catalysts to remove carbon monoxide.
3. **Water Resources Impacts:** The combined cycle facility will use up to five million gallons of water per day which the applicant is requesting Leesburg supply from the Town's Wastewater Pollution Control facility. According to the U.S. EPA, when pollutants and heat build up in the water used in combined cycle systems, the water is often discharged into lakes or streams. This discharge usually requires a permit and is monitored.

My primary concern related to water resources is how water will be treated prior to discharge into the local streams (Sycolin Creek, Goose Creek, and the Potomac River). The proposed power plant should not be permitted to degrade water quality in area streams through thermal or other pollution. Loudoun County may want to consider a condition of Special Exception approval related to requiring discharge treatment and monitoring to protect local streams.

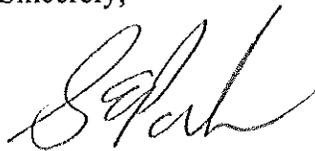
A secondary concern is for potential impacts to aquatic wildlife during drought times due to reduction of in-stream flows in the Potomac River as a result of diversion of five million gallons of water per day. Currently, those five million gallons of treated water from the Town's facility are discharged to the Potomac.

4. **Noise Impacts:** The applicant should provide information of measures to be used to control noise.
5. **Light Impacts:** The applicant should provide information on the height of all the components of the facility and what lighting is proposed. All outdoor lighting should be dark sky compliant to minimize light pollution.
6. **Natural Habitat and Endangered/Threatened Species:** The site has significant natural habitat that plays a role in the region's ecology. The application included a natural resource assessment showing presence of rare species of plants and animals (for example, American Ginseng and the Wood turtle). Design of the site should include retention of an integrated network of key habitat areas.

Although this is a rather general first submittal and a bit preliminary at this juncture, we do thank you for the opportunity to provide these comments. We are looking forward to addressing the second submittal, as well as the power plant proposal when it arrives. If you require further information, please do not hesitate to contact me at 703.771.2771.

Thank you for the opportunity to provide these comments. We look forward to the second submittal of this application in order to provide further analysis.

Sincerely,



Scott E. Parker, AICP  
Assistant to the Town Manager  
Town of Leesburg

cc: Town Council  
Planning Commission  
Town Manager

- Attachments:
1. TOL agency referral; Comprehensive Planning (David Fuller)
  2. TOL agency referral; Utilities Department (Amy Wyks)
  3. TOL agency referral; Environmental (Irish Grandfield)
  4. Applicant's Statement of Justification



ATTACHMENT 1

The Town of Leesburg  
INTEROFFICE MEMORANDUM  
DEPARTMENT OF PLANNING, ZONING & DEVELOPMENT

TO: SCOTT PARKER, ASSISTANT TO TOWN MANAGER      DATE: APRIL 30, 2009

FROM: COMPREHENSIVE PLANNER      RE: SPEX 2009-0009 & CMPT 2009-0001,  
HYBRID ENERGY, STONEWALL  
SECURE BUSINESS PARK,  
FIRST SUBMISSION

**RECOMMENDATION:** I do not support the approval of the special exception and commission permit applications as presented.

**ISSUE:** Does the proposal comply with the policy guidance of the Town Plan?

**BACKGROUND:** The applicant is proposing a special exception and a commission permit for the development of a utility generating plant and transmission facility on 87 acres south of Sycolin Creek and east of Sycolin Road. The applicant is proposing to build a primary and peak demand facility including up to a 600 megawatt combined cycle gas turbine-waste water energy plant, up to two 150 megawatt simple cycle peaking power natural gas turbines, and a 1 megawatt solar array. The energy plant is part of the Stonewall Secure Business Park that is the subject of a proposed rezoning of 294 acres to Planned Development-Industrial Park (PD-IP) and Planned Development-General Industry (PD-GI). The energy plant will provide power to the energy grid and serve as a redundant source of energy for the secure data center and high technology business park. The site is in the Transition Zone of the Loudoun County Revised General Plan.

This review is based on “Stonewall Secure Business Park: SPEX 2009-0009, CMPT 2009-0001” (4 sheets, last dated March 30, 2009), “Statement of Justification: Hybrid Energy Park, Stonewall Secure Business Park” (last dated March 25, 2009), and “Draft Conditions of Approval: Hybrid Energy Park, Stonewall Secure Business Park” (dated March 30, 2009).

**Analysis:** The majority of the site of the proposed zoning amendment and special exceptions lies beyond the Leesburg joint planning area (referred to in the Town Plan as the UGA/JLMA). Nevertheless, the site is immediately adjacent to the joint planning area, and the proposed development could have substantial impacts on the area and the Town.

1. **Application.** The statement of the justification for the power plant states that the plant will be a redundant source of energy “necessary for high tech and data center reliability.” (p. 3) Similarly, the statement of justification for the Stonewall Secure Business Park states that it is “crucial to a secure business park” to have redundancy and resiliency of infrastructure, including “uninterrupted power system by multiple sources.” (p. 4) However, the applications for the power plant and the secure business park have been submitted separately. It would seem appropriate to consider the two proposals jointly, in order to assess them properly.
2. **Transition Policy Area.** Leesburg’s planning has relied on development to be in accordance with the Revised General Plan’s Transition Policy Area designation for the area south of the Town. The proposal, as a necessary part of the Stonewall Secure Business Center, does not appear to comply with the policies for the Transition Policy Area because of the type of use (nonresidential), intensity of use (0.6 FAR), and provision of central sewer and water proposed in the business center. Nor does the application address possible aspects of an energy plant, such as noise, vibrations, and visibility of cooling towers. An intensive, industrial use is not consistent with the clusters, rural villages, or nonresidential uses envisioned for the Transition Policy Area (Revised General Plan, Transition Policy Area, Community Design policies 2 and 15, pp. 8-6 and 8-7); and it seems far from the “more rural character” (RGP, p. 8-5) envisioned for the Lower Sycolin Subarea of the Transition Policy Area.

In particular, Leesburg Joint Land Management Area Policy 3 states, “Power generation plants are not compatible with existing residential areas within or near the Town JLMA, and therefore, are not allowed in the Leesburg JLMA.” (p. 9-11) In addition, objective 4 of the community facilities and services element of the Town Plan states, “Locate and construct community facilities in regard to other Plan policies, including compatibility with the Town character, and protection and enhancement of residential areas, natural resources, and heritage resources.” (p. 83) Policy 3 of the Revised General Plan was written in response to a previously proposed power plant within the JLMA; that plant was to be powered by fuel oil with towers several hundred feet tall. Virtually all the site of the currently proposed plant is outside of the JLMA. On the one hand, since the site is located at the boundary of the JLMA, it would be appropriate for the county to consider carefully the applicability of its prohibition of power plants to this site. On the other hand, if the applicant can demonstrate that the proposed plant will not have adverse air, water, energy, and aesthetic impacts, it may be worth considering the plant’s acceptability in light of growing demands for electric power and the need for distributed, efficient power generation.

Comprehensive planning staff agrees with the applicant that natural gas is better for the environment than other fossil fuels (it produces the least carbon dioxide while producing more energy); that the solar array is better than fossil fuels (it is a renewable source that does not produce green house gases); that the combined cycle technology is better than single cycle (it is more efficient and therefore emits less green house gasses to produce the same amount of electricity); and that distributed electric generators are better than large, central ones (less electricity is lost during

transmission because of shorter distances between the generator and users). If the proposed energy plant can replace an existing coal plant, as suggested in the statement of justification, it will have even greater environmental benefits. The proposed energy plant thus helps to achieve the energy savings and air quality benefits called for in objective 6 of the natural resources element of the Town Plan. The proposed facility also is consistent with several recommendations of the Virginia Energy Plan, including increasing in-state generation of energy and using a heat recovery system.

Comprehensive planning staff also notes that the proposed facility, as a necessary component of the Stonewall Secure Business Park, may help to realize several economic development policies of the Town Plan. It would appear reasonable to consider the applications if the applicant can make an adequate case that this site is “ideal for a high-level security cluster” (p. 3 of the statement of justification for the business park) and that a suitable site in the Suburban Policy Area does not exist, perhaps even if the impacts of the proposal somewhat exceed those outlined in the Revised General Plan. (However, based on the discussion of security measures in the statement of justification for the business park (pp. 3 and 4), it does appear that this site is uniquely situated for a secure business park. Nor do the unsubstantiated statements in the “Issues for Consideration” portion of the statement of justification for the energy plant show that the proposed plant will not have adverse effects from fire hazards, noise, light, compatibility with the adjacent residences, screening, regarding, water quality, air quality, etc.)

In order to increase the environmental benefits of the proposed energy plant and business park, the applicant should consider agreeing to compliance with the Gas Star program (reduce natural gas leakage), Leadership in Energy and Environmental Design (LEED) for all buildings on the site, and Energy Star for all appliances and equipment, as well as developing a transportation demand management program for all occupants of the site and encouraging energy efficient vehicles for businesses locating in the park.

3. **Greenbelt.** The Revised General Plan calls for a greenbelt around the Town (Leesburg Joint Land Management Area Policy 4.a, p. 9-12). The proposal does not include any specifics about preservation of the greenbelt. The Town requests that greenbelt be accommodated in development of the site.
4. **Transportation.**
  - a. The proposal does not include any specifics about improvements to the road system abutting the site. The Town Plan’s Road Network Policy Map (which coincides with the Revised Countywide Transportation Plan) calls for Cochran Mill Road (Rt 653) to be a 4-lane, undivided through collector. According to the Town Plan, Cochran Mill Road should be relocated out of the floodplain of Sycolin Creek by crossing Sycolin Creek and traversing the site before intersecting Sycolin Road.

- b. The proposal does not include any specifics about improvements to the bicycle/pedestrian facilities abutting the site. The Town Plan's Bicycle/Pedestrian Facilities Policy Map shows a multi-use path along Sycolin Creek.

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David Fuller, AICP



ATTACHMENT 2

*The Town of Leesburg*  
INTEROFFICE MEMORANDUM  
DEPARTMENT OF UTILITIES

To: Scott Parker, AICP

From: *AE* Aref Etemadi, Deputy Director

Date: April 27, 2009

Subject: Stonewall Secure Business Park - County Referral  
Hybrid Energy Plant  
SPEX 2009-0009, First Submission

We have reviewed the aforementioned Loudoun County referral and offer the following comments:

1. It is not known how this facility will be served by public utilities as indicated in item "L" of attachment.
2. It is not known how the state agencies will react to the use of treated effluent from the wastewater operation in this process. The applicant must discuss the steps taken so far to address this issue.
3. It is not known how the effluent from the Town's facility will be conveyed to this facility.
4. This proposal must be endorsed by the Town council before the applicant proceeds any further on this application

c: Randolph W. Shoemaker, Director of Utilities  
Steve Cawthron, Manager WPCF



ATTACHMENT 3

The Town of Leesburg  
INTEROFFICE MEMORANDUM  
DEPARTMENT OF PLANNING, ZONING & DEVELOPMENT

TO: SCOTT PARKER, ASSISTANT TO THE TOWN MANAGER      DATE: APRIL 28, 2009

FROM: SENIOR ENVIRONMENTAL PLANNER      RE: STONEWALL HYBRID ENERGY PLANT

**RECOMMENDATION:** I recommend that the Town support approval of the primary and peak demand energy facility with up to 600 megawatt hybrid combined cycle gas-turbine/water energy plant, up to two 150 megawatt simple cycle peak natural gas turbines, and a 1 megawatt solar array subject to the applicant sufficiently addressing air, water, and other natural resources issues.

**ISSUE:** Should the Town support County approval of a hybrid energy park south of Leesburg?

**BACKGROUND:** Green Energy Partners/ Stonewall LCC is requesting Special Exception and Commission Permit approvals from Loudoun County for development of a electricity generating plant and transmission facility at the proposed Stonewall Secure Business Park on Sycolin Road south of Leesburg. The site is strategically located for a power plant with two interstate natural gas transmission lines and three 230KV Dominion Virginia circuits traversing the property. The applicant proposes to build a primary and peak demand facility with up to 600 megawatt hybrid combined cycle gas-turbine/water energy plant, up to two 150 megawatt simple cycle peak natural gas turbines, and a 1 megawatt solar array. The combined cycle facility will use up to five million gallons of water. The applicant is requesting Leesburg to consider a proposal to supply the water from treated wastewater from the Town's Wastewater Pollution Control facility.

Energy Production

According to the U.S. Governmental Energy Information Administration, coal-fired power plants account for about one-half of the Virginia's electricity generation and nuclear power plants account for another approximately one-third. Natural gas and petroleum-fired power plants account for most of the rest. According to the International Energy Association, 37% of the world's man-made carbon dioxide emissions result from electricity generation. Carbon dioxide is the primary gas in greenhouse gases, which contribute to the greenhouse effect and related climate change. Coal-fired power plants produce more carbon dioxide than any other method of generating electricity and are one of the largest contributors to emissions of smog-producing air pollutants. Further, the International Energy Agency reports that coal-fired plants are the least efficient of the methods for producing electricity.

A significant portion of the electricity used in Leesburg is produced from inefficient, high-polluting coal fired power plants. The proposed combined cycle natural gas power plant will

provide electricity at nearly twice the efficiency of coal powered plants while producing less than one-half of the carbon dioxide, and much smaller fractions of other greenhouse gases (NO<sub>x</sub> and SO<sub>2</sub>). While solar and wind energy production are even cleaner and more sustainable ways to produce electricity (they do not deplete non-renewable resources such as oil, gas, and coal), the proposed natural-gas facility is as clean and efficient as is available from fossil fuel based power plants. Considering the strategic location of the site along major gas and electric transmission lines, it makes sense to develop a combined cycle natural gas power plant here. Moreover, on a regional scale there will be environmental and natural resource benefits of the area reducing its dependence on electricity produced by coal burning power plants.

### *Air Resources Impacts*

Air resource impacts will be monitored and regulated by the Commonwealth of Virginia. I recommend that the applicant provide information on how the facility will be designed to minimize impacts to air resources through the use of advanced emissions controls such as a Selective Catalytic Reduction System to reduce nitrogen oxides and catalysts to remove carbon monoxide.

### *Water Resources Impacts*

The combined cycle facility will use up to five million gallons of water per day which the applicant is requesting Leesburg supply from the Town's Wastewater Pollution Control facility. According to the U.S. EPA, when pollutants and heat build up in the water used in combined cycle systems, the water is often discharged into lakes or streams. This discharge usually requires a permit and is monitored.

My primary concern related to water resources is how water will be treated prior to discharge into the local streams (Sycolin Creek, Goose Creek, and the Potomac River). The proposed power plant should not be permitted to degrade water quality in area streams through thermal or other pollution. Loudoun County may want to consider a condition of Special Exception approval related to requiring discharge treatment and monitoring to protect local streams.

A secondary concern is for potential impacts to aquatic wildlife during drought times due to reduction of in-stream flows in the Potomac River as a result of diversion of five million gallons of water per day. Currently, those five million gallons of treated water from the Town's facility are discharged to the Potomac.

### *Noise Impacts*

The applicant should provide information of measures to be used to control noise.

### *Light Impacts*

The applicant should provide information on the height of all the components of the facility and what lighting is proposed. All outdoor lighting should be dark sky compliant to minimize light pollution.

*Natural Habitat and Endangered/threatened Species*

The site has significant natural habitat that plays a role in the region's ecology. The application included a natural resource assessment showing presence of rare species of plants and animals (for example, American Ginseng and the Wood turtle). Design of the site should include retention of an integrated network of key habitat areas.

**SUMMARY:** The proposed power plant facility has the potential to reduce impacts on the regional and global environment. The applicant needs to provide additional detail and commitments on how they will minimize and mitigate noise and lighting pollution as well as impacts to local water, air, and other natural resources.

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James P. "Irish" Grandfield, AICP

Cc: Susan Berry Hill, Director P&Z

**STATEMENT OF JUSTIFICATION  
HYBRID ENERGY PARK  
STONEWALL SECURE BUSINESS PARK  
Special Exception and Commission Permit Applications  
SPEX 2009-0009 & CMPT 2009-0001  
February 27, 2009  
Revised March 25, 2009**

*ATTACHMENT 4*



**I. INTRODUCTION**

Green Energy Partners/Stonewall LLC, the Applicant is proposing a special exception and a commission permit for the development of a utility generating plant and transmission facility on approximately 87 acres in the Planned Development – General Industrial zoning district “PD-GI” portion of the proposed Stonewall Secure Business Park (ZMAP 2008-0017). The parcels that are subject to the proposed special exception and commission permit applications include Loudoun County Tax Map 60, Parcels 38 and 38A (MCPI 193-38-4362 and 193-49-0539) owned by Evergreen Loudoun – One Limited Partnership; Loudoun County Tax Map 60, Parcel 41 (MCPI 193-27-9018) owned by Sycolin Corner, LLC; Loudoun County Tax Map 61, Parcel 12 (MCPI 193-39-3665) owned by John A. Andrews, Trustee; Loudoun County Tax Map 60, Parcel 39 (MCPI 194-48-6020) and Loudoun County Tax Map 61, parcels 13 and 14 (MCPI 194-49-8227 and 193-29-6778) owned by LTI Limited Partnership, collectively the “Subject Property”.

The Subject Property is located on the north and east sides of the Route 267 (Dulles Greenway) east of Route 643 (Sycolin Road), south of Route 653 (Cochran Mill Road) and west of Gant Lane (Route 652) in the Catoctin Election District of Loudoun County, Virginia. Sycolin Creek borders the Subject Property to the north and the property to the north of Sycolin Creek is zoned JLMA – 20 and contains scattered residential uses along Cochran Mill Road and vacant land. Property to the north east is owned by Luck Stone Corporation and zoned TR-10 and property to the southeast is zoned TR-10 and is predominantly vacant. There a few homes on the west side of the Subject Property and these properties are also zoned TR-10. Traversing the Subject Property are three 230KV Dominion Virginia transmission circuits on two separate 130 foot (approximately) aerial structures, major electrical power transmission lines within a 250 foot wide easement. Two interstate natural gas transmission lines within a 30 foot wide easement transverse the Subject Property in a north/south direction along side of the electrical transmission lines. These interstate natural gas lines are unique in that these lines originate in two separate areas of the United States, which is particularly advantageous in natural disasters such as hurricanes when one of the lines may be disabled. One of the lines originates in the Ohio Valley and the other from the Gulf Coast. This is the primary reason that other fuels will not be required as a back up source. The Subject Property contains a mixture of open fields and a combination of evergreen and deciduous forested areas. An abandoned house and barn, along with two farm ponds are located upon the Subject Property.

## II. BACKGROUND

The State of Virginia is projected to face up to a 4,000 mega watt power shortage over the next ten years and approximately 65 percent or 2,800 mega watts of the shortage will be in the Northern Virginia region. The Northern Virginia region energy production is limited with transmission constraints. Severe congestion in the Northern Virginia regional power grid inhibits the orderly distribution of power in the region which may cause rolling blackouts and power outages in the near future. Electric power is distributed within Virginia by an electric power transmission system. The transmission system consists of high-voltage, high-capacity transmission components, including 765kv transmission lines in the western Virginia service area of American Electric Power and 500kv transmission lines in other parts of the state.<sup>1</sup> The power lines traversing the site are 230kv. Northern Virginia and Loudoun County are leaders in the high technology industry and are facing escalating reliability problems with electrical power generation and transmission which has resulted in high prices, threats of rolling blackouts, appeals for voluntary curtailment by consumers and the proposal of numerous transmission lines throughout Loudoun County. Resolving electricity reliability problems in a crisis atmosphere undermines customer confidence and is almost always unnecessarily expensive. Electricity is an integral part life and electric system reliability is indispensable to support residential, commercial, industrial and governmental functions. Lack of reliable electricity is not just an inconvenience but it creates an economic loss. Loudoun County has become one of the prime locations for internet related companies. These internet related companies include numerous data centers that create high value tax revenues with few employees. With Loudoun County's foresight the issue of electrical self sufficiency and security in the future would allow for the continuation of the expansion of these high value tax paying companies to locate within Loudoun County.

Over 90% of the electrical energy generated by utilities in Virginia is produced from coal and nuclear sources. Bulk power is moved through the State on large transmission lines. A network of smaller, lower voltage lines distributes the power from the larger power lines and individual generating facilities to consumers in urban and rural areas.<sup>2</sup> Production and combustion of coal results in the largest environmental impacts of all of the fossil fuels. Technology for capturing and sequestering carbon dioxide is expensive and unproven. Natural gas has 27 percent less carbon content of coal and 20 percent less than petroleum. Natural gas has an additional advantage over coal when used in highly efficient combined cycle gas turbines<sup>3</sup>. The proposed Stonewall Hybrid Energy Park will provide the means to produce Green Energy of electric power in a clean and efficient manner.

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<sup>1</sup> 2009 Virginia Center for Coal and Energy Research website: [www.energy.vt.edu/vept](http://www.energy.vt.edu/vept). Virginia Energy Patterns and Trends, Virginia Electric Energy

<sup>2</sup> Ibid.

<sup>3</sup> Virginia Chapter Sierra Club, "The Citizens Energy Plan for Virginia", 2007.

During congressional testimony, James Hansen, a noted climatologist and Director of NASA's Goddard Institute for Space Studies, told lawmakers that "phasing out the use of coal except where carbon is captured . . . is the primary requirement for solving global warming". Carbon capture technology will not be available for another 10 to 15 years<sup>4</sup>. The Environmental Protection Agency data on individual coal-fired generating units found that in 2020, 68 percent of the 1,041 total coal-fired, electric-generating units in the eastern half of the U.S. will still lack scrubbers or advanced nitrogen oxides controls<sup>5</sup>.

Virginia's electrical network is an integral component of the regional transmission system, which serves a number of important functions. In-state electric-power generation it is far from sufficient to satisfy the State's consumption. On average only 80 percent of the electrical energy used by Virginia consumers is generated in-state. Approximately 20 percent is imported from out-of-state generators on power transmission lines to supply Virginia residents and businesses<sup>6</sup>. Electricity loses power in distribution of electricity by line resistance in transporting it from other areas.

The Applicant is proposing to build a primary and peak demand facility including up to a 600 megawatt combined cycle gas turbine-waste water energy plant, up to two 150 megawatt simple cycle peaking power natural gas turbines and a 1 megawatt solar array. The solar array, combined cycle and peak generating turbines will provide a dedicated reliable source of power for the electrical grid. Additionally, uses within the Stonewall Secure Energy Park will be provided with redundant, efficient and reliable source of energy necessary for high tech and data center reliability. The Hybrid Energy facility will utilize up to 5 million gallons per day of waste water effluent for cooling water in the plant. This unique process could eliminate two billion gallons of effluent per year that is currently being discharged directly into the Potomac River that feeds into the Chesapeake Bay from the Leesburg Sewage Treatment Plant. This process will be the first one of its type in the Potomac River and will be a prime example of being able to show local governments ability to clean up the Chesapeake Bay. The Applicant is having discussions with the Town of Leesburg to use the waste water from the Leesburg Sewage Treatment plant.

There is a proposal for constructing a controversial \$1.8 billion overland power line to import power from several coal powered plants outside of the region due to the lack of facilities in this area. Green Energy Partners/Stonewall LLC has the viable solution for the long term health and long term security and prosperity of our region. Green Energy Partners/Stonewall LLC has the best location, the cleanest most efficient and proven modern technology for producing Green Energy clean power, and a process that produces clean energy utilizing natural gas, steam, solar and potentially the waste water from the Leesburg Sewage Treatment plant , contributing to the clean up of our vital water ways and the Chesapeake Bay.

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<sup>4</sup> Northern Virginia Magazine. "Plant Life" by Travis Hicks, January 2009.

<sup>5</sup> NPR.org. "U.S. Power Plants Slow to Clean Up Their Act" by Elizabeth Shogren, August 20, 2006.

<sup>6</sup> Ibid.

According to studies by the RW Beck Company, a hybrid energy facility at the proposed location will relieve congestion of the regional power grid and will meet the future demand for power in the region. Due to the fact that this proposed plant is considered 'Green' and is within the Power Service Area ("PSA") a regional power supplier, may qualify for credits that would enable the closure of a coal plant within the PSA.

Stonewall Secure Business Park has the necessary existing resources for an energy park with two interstate natural gas transmission lines traversing the property and three 230KV Dominion Virginia transmission circuits on two separate aerial structure lines. These transmission lines serve Virginia from the eastern seaboard from South Carolina to Maine. By utilizing two separate gas supply lines and having direct access to the interstate and regional power grid, the proposed Hybrid Energy Park will make a major contribution to national and regional security and make Loudoun County energy self sufficient while making a substantial contribution to the cleanup of the Chesapeake Bay.

Power plants are generally long-lived investments; the majority of the existing capacity is 30 or more years old. Because of the expected near-term retirement of many aging plants in the existing fleet, growth of the information economy, economic growth, and the forecasted growth in electricity demand, America faces a significant need for new electric power generation. North America's world-class electric system is facing several serious challenges. Major questions exist about its ability to continue providing citizens and businesses with relatively clean, reliable, and affordable energy services. The recent downturn in the economy masks areas of grid congestion in numerous locations across America. These bottlenecks could interfere with regional economic development. The "information economy" requires a reliable, secure, and affordable electric system to grow and prosper. Unless substantial amounts of capital are invested over the next several decades in new generation, transmission, and distribution facilities, service quality will degrade and costs will go up<sup>7</sup>.

Energy prices are on the rise, Northern Virginia Electric Cooperative ("NOVEC") has increased in power cost from 2002 to 2008 of 62 percent and Dominion Virginia Power has received approval and has implemented an increase of 18 percent in 2008. The costs are associated with the availability of power and cost of fuel for the production of electricity.

### **III. PROPOSAL**

The Applicant is proposing a utility generating plant and transmission facility use by special exception in the PD-GI portion of the Stonewall Secure Business Park pursuant to Sections 4-604(I) and 4-607(H) of the Zoning Ordinance. More specifically, the Applicant is proposing to build a primary and peak demand facility including up to 600 megawatt combined cycle natural gas turbine-waste water energy plant, up to two 150 megawatt simple cycle peaking

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<sup>7</sup> US Department of Energy Office of Electrical Delivery and Energy Reliability, GridWorks. "Overview of the Electric Grid" <http://www.energistics.com/gridworks.grid.html>

power gas turbines and a 1 megawatt solar array. The Hybrid Energy Park will utilize up to 5 million gallons per day of waste water effluent for cooling water. By turning the water into steam this will eliminate two billion gallons of effluent per year from being discharged into the Chesapeake Bay.

The primary waste water energy facility will incorporate two natural gas turbines with closed heat recovery steam generators (“HRSG”) to produce the heat to supply the steam injected turbines. This is called a combined cycle facility that captures 60 percent of the energy from the natural gas used to power the turbines. Coal fired energy plants have a less than 35 percent efficiency use of fuel energy. The waste water effluent is used in the cooling condenser which turns the turbine exhaust steam back into distilled water that may be recycled back through the HRSG. Excess steam and cooling produced by the plant is proposed to be used to heat and cool several million square feet of data centers and other buildings within Stonewall Secure Business Park. The use of the excess steam and cooling to heat and cool buildings is being utilized throughout Europe. Combined heat and power (“CHP”) plants capture heat and use it to provide space and water heating to local buildings. This type of system with the added benefit of cold water production from the facility could provide the ability to initiate power reduction requirements in future data centers. The capital cost of the facility is estimated over \$800,000,000 and will provide an economic engine for Loudoun County, in construction, tax revenues and in reliable source of Green energy. Real estate tax revenues for Loudoun County for the proposed Hybrid Energy Park at build out are estimated to be in excess of \$10,000,000.00 per year.

The property that is adjacent to the western boundary of the Subject Property is owned by the Luck Stone Corporation and Wildwood Farms, which is under contract for purchase by Luck Stone Corporation. The Issues for Consideration for special exception applications contained in Section 6-1310 of the Zoning Ordinance are addressed in the Attachment.

#### **IV. COMPREHENSIVE PLAN AND COMMISSION PERMIT**

The Subject Property is located within the Transition Policy Area and the Lower Sycolin Creek and Middle Goose Subarea as specified in the Loudoun County’s Revised General Plan (RGP). The Transition Policy Area serves as a visual and spatial transition between the Suburban and Rural Policy Areas and envisioned that it will provide some *unique development opportunities* (emphasis added). The non-residential component of the Transition Policy Area will be comprised of compatible uses that represent an appropriate transition from suburban to rural land uses. The proposed Stonewall Secure Business Park is a unique development that will provide a compatible transition from suburban to rural land uses while protecting the Luck Stone Quarry from residential development.

Development of the Hybrid Energy Park supports the RGP General Policies, as follows:

Policy 1: protect drinking water resources of Lower Sycolin subarea. The Hybrid Energy plant may utilize up to five million gallons of treated effluent per day produced by the Leesburg

Waste Water Treatment plant which will eliminate two billion gallons of effluent per year from being discharged into the Potomac River and the Chesapeake Bay. The cooling water will be turned into steam and proposed to be used to heat and cool the data centers and buildings in Stonewall Secure Business Park.

Policy 7: protect the extractive industry of Luck Stone quarries. The Hybrid Energy Park which is proposed in the northern eastern portion of the Subject Property is proposed as PD-GI which is compatible with the Luck Stone quarry. The Hybrid Energy Park is complimentary and compatible with the operations of a quarry and will protect the quarry from residential encroachment.

#### Lower Sycolin and Middle Goose Subareas

Luck Stone Quarry will be protected from encroaching residential development with the Stonewall Secure Business Park. Also, the creation of a buffer and voluntary open space are consistent with the River Stream Corridor Overlay District (RSCOD) policies which is a priority in this Subarea.

#### Community Design Policies

Policy 15: encourage the development of non-residential uses that provide a transition from suburban to rural. The proposed Stonewall Secure Business Park and the Hybrid Energy Park provides a transition from suburban to rural areas.

Policy 26: protect the Luck Stone Quarry in the Lower Sycolin Subarea from incompatible uses by ensuring that encroaching new development does not hinder the quarry operation. Stonewall Secure Business Park and the Hybrid Energy Park will be compatible to the Luck Stone Quarry and will not hinder the quarry operations.

#### Economic Development Policies

Policy 1: Loudoun seeks and promotes a diverse economic base in multitude of industries that it is not entirely dependent upon any single employer or employment sector. Stonewall Secure Business Park and the Hybrid Energy Park will diversify the economic base in Loudoun County that and it is not dependent upon a single employer or employment sector. The Hybrid Energy Park will provide Loudoun County with tax revenues and provide Green energy to help attract and support the industry cluster of high security governmental and business uses in Loudoun County.

Policy 4: The County recognizes that economic policy and land use policy must be coordinated. The County seeks to implement the economic goals as adopted and subsequently amended by the Board of Supervisors in Loudoun County's Economic Development Plan and Growth Strategy within the framework provided by the Comprehensive Plan. The proposed land uses combined with the positive economic impacts of Stonewall Secure Business Park and the

Hybrid Energy Park further the goals and policies of the RGP. The Hybrid Energy Park will provide Green energy for Loudoun County and northern Virginia, and keep costs more reasonable than importing electricity from other areas of the region. The capital cost of the facility is estimated over \$800,000,000 and will provide an economic engine for Loudoun County, in construction, tax revenues and in reliable source of Green energy. Real estate tax revenues for Loudoun County for the proposed Hybrid Energy Park are estimated to be in excess of \$10,000,000.00 per year.

#### Energy and Communications Policies

Policy 4: Electric generation facilities that use clean burning and environmentally sound and proven fuel sources for power generation can be located only where their impact on the surrounding land uses and the environment is compatible. The proposed Hybrid Energy Park is compatible with the surrounding land uses and environment. It will use efficient and proven modern technology for producing clean power. The production of power produces clean energy utilizing natural gas from the existing lines and potentially the waste water from the Leesburg Sewage Treatment plant will contribute to the clean up the Potomac River and the Chesapeake Bay.

#### Air Quality Policies

Policy 4: The County will comply with the requirements of the Federal Clean Air Act Amendments of 1990 through support of the State Implementation Plan. The proposed Hybrid Energy Park will be required to comply with the requirements of the Federal Clean Air Act Amendments of 1990. Natural gas has 63 percent of the carbon content of coal and 80 percent of petroleum; natural gas has an additional advantage of fuel to electricity efficiency over coal when used in highly efficient combined cycle gas turbines as proposed in the Hybrid Energy Park. Additional benefits for air quality are that the natural gas will not be transported by tanker trucks that would create more pollution. The Hybrid Energy Park will provide the means to produce electricity in a Green and clean efficient manner and the ability to reduce or eliminate high carbon emitters as quickly as possible.

Policy 5: Loudoun County acknowledges its location in the Washington, DC-MD-VA Non-attainment Area. The County will continue to play an active role on the Metropolitan Washington Air Quality Committee (MWAQC) and the National Capital Region Transportation Planning Board (TPB) and will do its part in the implementation of the Phase II Attainment Plan for the Washington Metropolitan Nonattainment Area, as well as future emissions reduction programs. Due to the fact that the proposed Hybrid Energy Park is considered 'Green' and is within the Power Service Area ("PSA") a regional power supplier, may qualify for credits that would enable the closure of a similar size coal plant within the PSA.

The proposed Hybrid Energy Park as demonstrated above is in substantial accord with the Comprehensive Plan, as required by Section 6-1100 of the Zoning Ordinance.

## V. TRANSPORTATION

Access to the Stonewall Secure Business Park will be from Sycolin Road at two locations with guard houses and secured access. All of the roads within the Business Park will be private and will be privately maintained due to the secure nature of the Park. For enhanced security the Hybrid Energy Park will only be accessed within the Stonewall Secure Business Park. The traffic study report titled "Stonewall Secure Business Park Traffic Impact Study Loudoun County, Virginia", prepared by Wells + Associates, Inc. and dated November 5, 2008, was submitted with ZMAP 2008-0017. The conclusions in this traffic study state that Stonewall Secure Business Park will be developed in three separate phases in order to minimize the development's impact on the surrounding road network. For specific information, please refer to the Study. A traffic memorandum is enclosed with the applications, which specifically addresses the trip generation associated with the Hybrid Energy Park. This traffic memorandum was prepared by PHR+A from John Callow and dated February 25, 2009.

## VI. SUMMARY

Approval of the proposed special exception and commission permit applications are the first steps in a long process for approval of the Hybrid Energy Park which requires additional Federal and State agencies approval.

Electricity will be generated by the most efficient and state of the art technology which will supply northern Virginia with power and address the shortage and congestion in the PSA. The Stonewall Hybrid Energy Park may reduce the need for additional overhead power transmission lines in Loudoun County that are importing power from outside of Virginia.

The proposed Hybrid Energy Park is consistent with the Comprehensive Plan. The Subject Property is located within the Transition Policy Area and the Lower Sycolin Creek and Middle Goose Subarea as specified in the Loudoun County's Revised General Plan (RGP). The Transition Policy Area serves as a visual and spatial transition between the Suburban and Rural Policy Areas and envisioned that it will provide unique development opportunities (emphasis added). The non-residential component of the Transition Policy Area will be comprised of compatible uses that represent an appropriate transition from suburban to rural land uses. The Luck Stone quarry which borders the Subject Property to the east will be protected from residential development by the Stonewall Secure Business Park. The proposed Stonewall Secure Business Park will fulfill the needs for a Federal Government Contracting Industry Cluster and provide Loudoun County with a significant increase in tax revenues while providing a location for uses that require high security.

For the reasons stated above, the Applicant respectfully requests a recommendation of approval from Staff and the Planning Commission and approval by the Board of Supervisors of the Hybrid Energy Park in the proposed Stonewall Secure Business Park.

**ATTACHMENT**

**STATEMENT OF JUSTIFICATION  
HYBRID ENERGY PARK  
STONEWALL SECURE BUSINESS PARK  
Special Exception Application  
Issues for Consideration**

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Section 6-1310 Issues of Consideration of the Revised 1993 Loudoun County Zoning Ordinance states: "In considering a special exception application, the following factors shall be given reasonable consideration."

- (A) **Whether the proposed special exception is consistent with the Comprehensive Plan.**  
*The proposed Hybrid Energy Park and the Stonewall Secure Business Park provides an appropriate transition from suburban to rural land uses. The Hybrid Energy Park will provide a compatible transition from suburban to rural land uses while protecting the Luck Stone Quarry from residential development.*
- (B) **Whether the proposed special exception will adequately provide for safety from fire hazards and have effective measures of fire control.**  
*The proposed special exception use will adequately provide for safety from fire hazards.*
- (C) **Whether the level and impact of any noise emanating from the site, including that generated by the proposed use, negatively impacts the uses in the immediate area.**  
*Noise emanating from the Hybrid Energy Park will not negatively impact the uses in the immediate area.*
- (D) **Whether the glare or light that may be generated by the proposed use negatively impacts uses in the immediate area.**  
*It is not anticipated that glare or light generated by the proposed use will negatively impact the uses in the immediate area.*
- (E) **Whether the proposed use is compatible with other existing or proposed uses in the neighborhood, and adjacent parcels.**  
*The proposed use is compatible and will provide electrical power for the existing and future uses within Stonewall Secure Business Park as well as the Northern Virginia region.*
- (F) **Whether sufficient existing or proposed landscaping, screening and buffering on the site and in the neighborhood to adequately screen surrounding uses.**  
*The perimeter buffer will provide screening and buffering from the surrounding uses .*

- (G) Whether the proposed special exception will result in the preservation of any topographic or physical, natural, scenic, archaeological or historic feature of significant importance.**  
*A 50 foot tree preservation area will preserve existing trees around the perimeter of the Stonewall Secure Business Park.*
- (H) Whether the proposed special exception will damage existing animal habitat, vegetation, water quality (including groundwater) or air quality.**  
*The proposed special exception uses will have a minimal impact on the air quality and water quality will be improved.*
- (I) Whether the proposed special exception at the specified location will contribute to or promote the welfare or convenience of the public.**  
*The proposed special exception use will support the uses within Stonewall Secure Business Park and will provide electricity to the power grid to prevent future brown outs which promotes convenience of the public.*
- (J) Whether the traffic expected to be generated by the proposed use will be adequately and safely served by roads, pedestrian connections and other transportation services.**  
*The proposed Hybrid Energy Park will not generate many vehicular trips and these trips will be adequately and safely by the roadways internal to Stonewall Secure Business Park and the surrounding road networks.*
- (K) Whether, in the case of existing structures proposed to be converted to uses requiring a special exception, the structures meet all code requirements of Loudoun County.**  
*Existing structures are not proposed to be converted to uses requiring a special exception or primary uses.*
- (L) Whether the proposed special exception will be served adequately by essential public facilities and services.**  
*The proposed special exception use will be served adequately by public facilities and services.*
- (M) The effect of the proposed special exception on groundwater supply.**  
*The proposed special exception use will not have an effect on groundwater supply.*
- (N) Whether the proposed use will affect the structural capacity of the soils.**  
*The proposed use will not affect the structural capacity of the soils.*

- (O) **Whether the proposed use will negatively impact orderly and safe road development and transportation.**  
*Road improvements will be made to safely accommodate the traffic that will be generated by the uses in the Stonewall Secure Business Park.*
- (P) **Whether the proposed special exception use will provide desirable employment and enlarge the tax base by encouraging economic development activities consistent with the Comprehensive Plan.**  
*The tax base will be enlarged and approximately 25 jobs will be created with the development of the Hybrid Energy Park.*
- (Q) **Whether the proposed special exception considers the needs of agriculture, industry, and businesses in future growth.**  
*The proposed Hybrid Energy Park will generate electricity for the future uses within Stonewall Secure Business Park and the Northern Virginia region.*
- (R) **Whether adequate on and off-site infrastructure is available.**  
*Adequate on and off-site infrastructure is available or will be improved to serve the Stonewall Secure Business Park and the Hybrid Energy Park.*
- (S) **Any anticipated odors which may be generated by the uses on site, and which may negatively impact adjacent uses.**  
*No odors are anticipated with the proposed special exception uses on the Subject Property that will negatively impact the adjacent uses.*
- (T) **Whether the proposed special exception uses sufficient measures to mitigate the impact of construction traffic on existing neighborhoods and school areas.**  
*Sufficient measures to mitigate the impact of the construction traffic on the existing residential uses will be determined during the processing of the special exception application.*