



United States Department of the Interior

NATIONAL PARK  
SERVICE

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

**Remarks to the Prince William County Planning Commission Concerning the Independent Hill Small Area Plan/Comprehensive Plan Amendment #CPA2017-00008**

**December 9, 2020 7:00 PM**

**Tanya M. Gossett  
Superintendent**

Thank you, Mr. Chairman, for this opportunity to comment on the **Independent Hill Small Area Plan/Comprehensive Plan Amendment**.

The National Park Service has been involved with this planning effort since summer of 2019. We believe the Small Area Plan dovetails well with the future parking area, trailhead, and recreational trails that NPS is planning for south of Aden Road. We look forward to continuing to work with the County and our neighbors on trail connectivity, public access, and historic and natural resource stewardship as Independent Hill continues to grow as a national park gateway community.

We are concerned, however, about what this plan may signify in terms of land use and land disturbance within the Rural Area and the park's Congressionally-authorized boundary. Prince William Forest Park protects a 14,000-acre forest landscape and more than half of the Quantico Creek watershed, and provides recreational enjoyment of those natural resources to the public. That recreational use generates about \$25 million per year in local economic output. Increased levels of development within the Rural Area has the potential to jeopardize the National Park Service's ability to fulfill its mission at Prince William Forest Park. Our concerns include stormwater management, the introduction of invasive species into the park's protected forest, and further complications from that impact, such as habitat loss.

First, if approved as part of the Comprehensive Plan, more intense development will be allowed within the County's long-established Rural Area, where land is generally zoned for agricultural, low density use. Prince William Forest Park's Congressionally-authorized boundary is coterminous with the Rural Area boundary. While the County's Staff Report indicates that "A minor adjustment to the rural boundary is being made," the precedent of opening the Rural Area to more intense development could affect the park for decades. By our calculations, there are

more than 1,200 acres of private land within that coterminous area; if the precedent is established here, the park could face significant and cumulative development impacts in the future.

Second, we ask that the County consider more stringent, concrete stormwater management practices in areas adjacent to the headwater basin of Quantico Creek. Quantico Creek is the keystone to the park's ecosystem. Within the park, the stream consistently ranks among the most unspoiled in the Chesapeake Bay region and provides an important source of baseline condition data for environmental monitoring in Northern Virginia.

Third, we believe it is premature to slate this area for development without a better understanding of potential environmental impacts. Page 27 of the Small Area Plan states that the project area "is largely unstudied with regard to a variety of environmental conditions and potential development constraints. Natural resources such as wetlands; unstudied perennial streams; rare, threatened and endangered species and habitats, high quality forests, and the like." The Plan further states "analysis of such features will need to occur when rezoning and/or SUP cases are proposed." We understand that approach is common practice in land use reviews, but would prefer to see the Small Area Plan address environmental impacts to the interconnected natural resources in Prince William Forest Park prior to its approval.

Fifteen years of data collected by the NPS demonstrates that the park's native-species forest is healthy and supports highly intact bird communities, among other types of wildlife. NPS research indicates that when intact forest land is broken up by clearing and ground disturbance, new forest edges are created and invasive plants and vines increase.

In a recent analysis of 39 national parks in the eastern United States, Prince William Forest Park was ranked the second-most pristine forest thanks to the minimal presence of exotic plants. For example, the park has an exceptionally low quantity of Japanese stiltgrass, a highly aggressive and difficult-to-eradicate plant. Invasive plants such as Japanese stiltgrass can quickly outcompete native plants that are needed by wildlife and birds, such as the 15 bird species of continental concern in the park. Vines and invasive plants also strangle out existing trees and hinder forest regeneration. Development adjacent to and near NPS-owned land has the potential to spread those invasives, especially if adjoining landowners do not take appropriate, long-term actions to eradicate them.

For these reasons, we ask the Planning Commission to consider carefully how this proposal may open the door to long-term development impacts to the Rural Area, to the ecological resources of Prince William Forest Park, and, ultimately, to the nearly 400,000 local and national visitors who enjoy them each year.