

Date: March 16, 2021

File No.: _____

ARTICLE I
**DETAILED PROJECT DESCRIPTION AND HOW IT ALIGNS WITH THE
GOALS AND OBJECTIVES OF THE ORANGE COUNTY COMPREHENSIVE PLAN**

A. Project Description

The Applicant proposes rezoning the Property - which consists of 20 parcels and currently zoned a mixture of Agricultural, Industrial, Residential, and Commercial, to Planned Development – Mixed Use (PDM) (“PDM”) in order to develop a mixed-use project to be constructed over an approximate 30-year timeframe, in several phases. The Property is more specifically depicted in the GDP attached as **Exhibit A** to this Narrative. For ease of reference, a list of the parcels identifying the owner and specific zoning for each parcel is attached as **Exhibit B** to this Narrative.

The Property is situated in the District Four East Precinct of Orange County, Virginia (“County”), at the intersection of Germanna Highway (Route 3) and Route 20. All of the Parcels are located in the Germanna-Wilderness Area (“GWA”), with the majority of the land being vacant with the exception of a few single-family detached homes. The Property is located in Subarea 4: *Wilderness Run* of the GWA, which is designated as the easternmost portion of the County. The GWA consists of eight Subareas. The Property is located in Subarea 4: *Wilderness Run* of the GWA. The PDM District is one of three zoning districts available only within the GWA.

The purpose of the proposed rezoning to PDM is to allow the development of the Project, which, at this time, is anticipated to include medium density residential uses (six to eight units per acre), low density residential uses (one to four units per acre), senior assisted-living uses, commercial uses, office and light industrial uses, institutional uses and parks, and the remaining acreage reserved for conservation, open space, and additional purposes. The proposed Project at full-build out is more specifically detailed in the GDP and the Design Guidelines Manual (defined below) included as exhibits to this Narrative.

The Project is planned to include three land use types: residential, commercial/mixed use, and civic. Besides the residential and commercial use, additional potential dedicated land uses include a public elementary school site and Regional Park. The Project is proposed to include eleven neighborhoods, in which certain specified uses would be permitted. The Land Use Plan of the GDP reflects the anticipated locations of these neighborhoods within the context of the Property, and outlines the uses permitted in each. Generally, the uses within the Project are at the highest densities closest to Germanna Highway (Route 3) where the Town Center will be located, with density decreasing moving further north into the Property. The neighborhood locations have been determined considering the nature of current land uses and development

patterns, as well as the existence of certain physical features that define the neighborhoods rather than artificial boundaries.

The Project is designed to include ample open space and conservation areas, as well as both active and passive recreational areas, all strategically located within the Property. The Open Space and Recreation Plan of the GDP depicts the general locations of these areas. Open space and conservation areas include a proposed dedicated Regional Park, a Town Center park, numerous pocket and neighborhood parks within each neighborhood, a wide buffer of existing mature vegetation surrounding the entire perimeter of the Property (except for that portion of the Property fronting Germanna Highway (Route 3)), as well as wooded buffers within each of the residential neighborhoods. The Project also is served by a comprehensive network of walking and biking trails, as more particularly depicted on the GDP.

To provide additional information relating to the Project, we have enclosed the Design Guidelines Manual dated March 2021 (**Exhibit C**). The Applicant also conducted a County traffic impact analysis, which was prepared by Gorove Slade Transportation Planners and Engineers dated May 8, 2020 and revised August 13, 2020, and titled “Traffic Impact Study – Wilderness Crossing Development” (“TIA”), which has been previously provided to and has been under review by the County. The Applicant has conducted an economic impact and revenue analysis, which was prepared by RKG Associates Inc., dated January 2021, and titled “Market Study and Economic and Fiscal Impact Analysis of Wilderness Crossing Development (2020-2030)” (“FIA”) attached as **Exhibit D** to this Narrative.

B. Comprehensive Plan

The Comprehensive Plan classifies the Property as part of the GWA. The GWA is subject to the Germanna Wilderness Area Plan (“GWAP”), which was adopted by the Board of Supervisors on July 14, 2015, and made part of the Comprehensive Plan. The Comprehensive Plan specifies that the GWAP is intended for use as a stand-alone document, but still within the larger context of the goals and objectives of the Comprehensive Plan. With the adoption of the GWAP, the GWA is its own future land use category.

As articulated below, the Applicant’s proposal conforms to the policies established by the Comprehensive Plan and more specifically, the GWAP.

(a) The Proposal is consistent with the future vision of the GWA as set forth in the Comprehensive Plan.

The GWA is a designated growth area under the Comprehensive Plan and has been recognized by the County as its *primary development area*. The GWAP establishes a strategic future vision for the GWA to accomplish specified objectives. The *Foreward* to the GWAP acknowledges the following as one of the “theme statements” capturing the essence of the GWA future vision:

A Place to Live, Work, and Play with a higher standard of design and development which is a self-contained, complete community that is appealing to

current and prospective residents and is a place clearly differentiated from other places. It will be a dynamic destination that results in a an economic engine for the entire County.

The proposal supports the future vision of the GWAP. The proposal to rezone the Property to PDM will allow the development of a dynamic, self-contained and cohesive community as depicted in the GDP and containing commercial, light industrial, and residential uses. The proposal will provide current and prospective residents with onsite employment opportunities and a variety of both active and passive recreational options. The diverse uses and distinct, yet integrated planning and high quality design features will distinguish the community from other areas.

The Project includes a robust, centralized Town Center fronting Germanna Highway (Route 3) which will provide significant opportunity for economic growth and community development by incorporating opportunities for anchor retailers, smaller retail companies, entertainment, dining options, office space, and a proposed industrial park, for the use and benefit of the Project community and the County population at large. The economic benefits are set forth in detail in Article III of this Narrative.

(b) The Proposal supports the four ley considerations of the GWAP.

The *Foreward* to the GWAP further specifies that the vision of the GWAP hinges on **four key** considerations:

- 1) Promote connectively;
- 2) Provide ample conservation areas and open space;
- 3) Set standards and expectations for attractive and harmonious development; and
- 4) Encourage and support economic growth and development.

The proposal addresses these GWAP key considerations. As reflected in both the TIA and the GDP, the Project is designed to promote vehicular connectivity, served by eight existing intersections, additional future external intersections, and future internal intersections as reflected in the TIA. Collector roads through the Town Center will efficiently distribute vehicular movement to prime destinations, while localized roads will require slower vehicular movement and priority pedestrian access and safety. Transit stops will be provided in relation to the highest concentration of users and will be located within walking distance to the commercial and retail areas of the community. The Project design also promotes pedestrian connectivity, served by a comprehensive network of sidewalks and trails (both pedestrian and cycling) serving all areas of the community, ensuring safe and efficient pedestrian access to destinations within the Project.

The Project provides ample conservation areas and open space. These conservation areas are situated to promote natural resource conservation and to preserve existing mature vegetation to serve as a natural buffer bounding the perimeter of the Property, as well as between neighborhoods and other areas in the community. The open space areas are anticipated to consist of the proposed dedicated Regional Park, the Town Center park, and numerous pocket parks and

neighborhood parks interspersed throughout the Project. Please see the GDP (**Exhibit A**) and Design Guidelines Manual (**Exhibit C**) for more specific information and locations.

The Project will include building design standards which promote a distinct, yet coherent architecture that will foster a unique identity for the community. Residences will be built in the tradition of simple, yet elegant design utilizing traditional, high quality, and durable materials, with the overall aesthetic emerging from elevation components and building details rather than from mere orientation. The residences will have a variety of designs, which are harmonious, but provide interest. The commercial and industrial building design standards require appropriate setbacks, sizes, parking locations, and accessibility locations to ensure a unified aesthetic, appropriateness of scale, and an aesthetically pleasing, pedestrian experience. Please see the Design Guidelines Manual for design details.

The Project will encourage and support economic growth and development in the County, as more specifically detailed in Article III of this Narrative.

(c) The Project's location within Subarea Four of the GWA supports approval of the proposed rezoning.

As discussed above, the Property is located in Subarea Four of the GWA. Subarea Four consists of a total of 3,252 acres. Because the Property comprises a **significant portion** of the area in Subarea 4, approval of the rezoning provides a unique opportunity for the County to ensure that the Comprehensive Plan objectives are achieved.

The GWAP establishes **three** areas of consideration in the 50 Year Vision for Subarea Four – 1) Land Uses & Zoning; 2) Economic Development, and 3) and Infrastructure. The Project is consistent with the 50 Year Vision in each of these areas, as outlined below.

Land Uses & Zoning

The proposal is consistent with the 50 Year Vision for Land Uses & Zoning as it relates to housing and commercial uses. The Project is a mixed-use community consisting of clustered residential neighborhoods with ample open space and a variety of housing types – including single family homes and townhomes. The Project is served by an attractive, cohesive mixed-use Town Center with multi-family housing, as well as a broad assortment of commercial uses located along the Germanna Highway (Route 3) corridor, across from Lake of the Woods.

The proposal also is consistent with the 50 Year Vision as it relates to the development of hospitality and health-care related uses, public uses, and open space and recreational uses. The Project contemplates a potential hotel, a medical-focused community college campus, a wellness center, a medical center, a pharmacy, and assisted living facilities. A public safety facility housing fire, rescue, and law enforcement is contemplated to be dedicated. In addition, the Project will include both active and passive recreational park uses, served by numerous pocket parks and neighborhood parks, as well as a comprehensive system of pedestrian and cycling trails interspersed throughout the entire community. Please refer to the GDP attached as **Exhibit A** and the Design Guidelines Manual attached as **Exhibit C** to this Narrative.

Economic Development

The proposal is consistent with the 50 Year Vision for economic development in Subarea Four. The Project contemplates a variety of commercial development types within the Town Center which will support and enhance the economic vitality of the County. The Town Center is a walkable, dynamic mixed-use space with an open and pleasant appearance, designed to be compatible with adjacent residential areas. The Town Center provides an opportunity for local and broader civic engagement through various retail, restaurant, entertainment, and hospitality uses in immediate relation to a range of residential housing types.

The Project has been designed in a manner that will promote a strong brand economic identity, especially with the vibrant and diverse Town Center, as well as designed in a manner that centers proximity to the regional population and employment centers, providing a competitive, advantage for business development. Please refer to the FIA attached as **Exhibit D** to this Narrative.

The Town Center will contain a mix of businesses, including retail, office and other uses, to serve the local and broader population and markets. The Project location – fronting the Germanna Highway, is designed in accordance with the Route 3 Corridor District. Finally, transportation improvements within the project integrate safety, capacity and efficiency to meet projected demands, as outlined more specifically in the TIA.

Infrastructure

The proposal is consistent with the 50 Year Vision for infrastructure in Subarea Four. Again, transportation improvements will integrate safety, capacity, and efficiency and will be sufficient to meet demands. Utility improvements, including the extension of water, wastewater, stormwater, telecommunications electricity and natural gas will be available to meet demands. As reflected in the GDP, appropriate infrastructure, including a vast network of trails, will support public access to the Rapidan River, while also ensuring environmentally sensitive riverfront development is protected by wide buffers and open space. These trails are located throughout the conservation and open space areas to provide connectivity to Project neighborhoods and amenities.

- (d) The Proposal also is consistent with the overarching objectives identified in the Comprehensive Plan to guide the development, conservation and general use of land within the GWA.*

The proposal is consistent with and will aid the County in accomplishing the **overarching objectives** identified in the Comprehensive Plan relating to the development, conservation and general use of land within the GWA. The objectives are recited below, followed by our response to each as it relates to the Project.

Objective. Development will be coordinated with the availability of adequate public facilities so that the expansion of water/wastewater, transportation, telecommunications,

electrical capacity and other related infrastructure occurs in timely conjunction with development proposals.

The Project will be developed in several phases over a 30-year timeframe. Each phase of development will be coordinated with the County and appropriate authorities to ensure timely availability of public facilities, services, and infrastructure.

Objective. Planned development proposals are preferred to those utilizing traditional zoning techniques.

The proposal is to rezone the Property to PDM, which, as the above objective specifies, is a development technique favored over traditional zoning in the GWA.

Objective. Conservation areas will be maintained along and adjacent to all extreme topography, wetlands, water features, and most-importantly along the Rapidan River.

The Project provides ample conservation areas and open space. A large area of the Project has been allocated to open space and conservation area, strategically located to accommodate topography, wetlands, and water features, including the Rapidan River. More specifically, the conservation areas are situated to promote riverfront and waterway conservation – with wide wooded buffers running along the full length of Rapidan River and Wilderness Run, as well as between neighborhoods and other areas in the community. Please see the GDP and the Design Guidelines Manual for more specific details.

Objective. A focus will be maintained on quality development to fit with the economic development branding and marketing strategy for the area. Part of this objective will be achieved by maintaining higher standards for site and building layout and design, enforcing access management standards along Route 3, and promoting multi-modal connectivity.

The Project will include building design standards which promote a high quality development that will foster a unique identity for the community. Residences will be in the tradition of simple, but elegant design, using traditional, high quality and durable materials throughout the community. The design standards for the commercial and industrial uses include minimum setbacks, coordinated building compositions, and other elements to provide visual building continuity and promote an open-air feel, a pleasing aesthetic, and pedestrian-friendly experience in the Town Center. Like the residential community, the Town Center will be built using high quality and durable materials. Please see the Design Guidelines Manual attached as **Exhibit C** to this Narrative for additional detail.

Objective. Historic and cultural assets and natural resources in the area will be protected, celebrated and endorsed as reinforcement of the quality of life within this area of the County.

The Project is designed to preserve the site's natural resources and to allow residents and visitors to enjoy those natural resources, all as described in this Narrative and depicted in the GDP attached as **Exhibit A** to this Narrative.

Objective. Economic development will be incentivized as a means of inducing business investment, improving the median personal/household income, and expanding the tax base, thereby providing for a more balanced and sustainable economy for the entire County.

The Project satisfies the foregoing economic-related objectives. Please see the FIA attached as **Exhibit D** to this Narrative.

C. Zoning District and Ordinance

Furthermore, the Property’s location and proposed rezoning is consistent with the intent of the PDM District as articulated under the County Zoning Ordinance (“Ordinance”).

As noted above, the Property consists of 20 Parcels which are currently zoned a mixture of Agricultural, Industrial, Residential, and Commercial. All of the Parcels are located in Subarea 4: Wilderness Run of the GWA. The PDM District is one of three zoning districts available only within the GWA.

The Applicant’s proposal to rezone the Property PDM is in line with the purpose of the PDM District as outlined in Division 13 of Section 70-567A(b) of the Ordinance, which specifically provides:

The intent of this district is to permit flexibility and a focus on high-quality design for mixed-use developments which:

- (1) Provide a level of density and intensity in order to promote a dynamic and convenient neighborhood;
- (2) Exemplify traditional communities that are pedestrian-oriented and offer a variety of transportation, housing, commercial and recreational options;
- (3) Take a creative approach in preserving and protecting natural site features through innovative site planning and the use of low impact development (LID) principles for stormwater management as may be permitted by the Virginia Department of Environmental Quality; and,
- (4) Provide for the efficient use of land which preserves open space and limits impacts to surrounding properties.

The Project contemplates mixed uses, consisting of clustered residential neighborhoods with differing densities and a variety of housing types which are served by the mixed-use Town Center and a range of both active and passive recreational features. The neighborhoods and Town Center are pedestrian oriented, served by a comprehensive network of roads and sidewalks throughout the Project. The recreational features include miles of natural and multi-use trails serving the Property (both pedestrian and cycling), the Town Center park, pocket parks and neighborhood parks, all which are interspersed throughout the Project, as well as a potential wellness center and dedicated Regional Park.

The Project design contemplates the preservation of existing wooded areas, topography, and natural features within and between neighborhoods, as well as the preservation of the natural vegetative buffer surrounding the perimeter of the Project, with the exception of that portion of the Project fronting Germanna Highway (Route 3) and which is part of the Town Center. The preservation of these natural features limits impact to surrounding properties.

The Project also is in compliance with the PDM area standards, general site layout guidelines, and building standards established in Sections 70-567D, E, and F of the Ordinance as reflected in this Narrative and the exhibits to this Narrative.

ARTICLE II

ANTICIPATED TRAFFIC VOLUMES AND RELATED TRAFFIC IMPACTS

As noted above, the Applicant conducted a TIA to assess transportation impacts of the proposed Project and identify possible transportation improvements to offset the impacts of the increase in future traffic demand and the changes in traffic operations and characteristics due to the Project. The TIA has been submitted to the County and to the Virginia Department of Transportation (“VDOT”) for review and the Applicant has responded to County and VDOT comments as those comments have been received. Notwithstanding, in accordance with VDOT and County requirements, the TIA may be amended from time to time during the development of the Project through full build-out.

The analysis indicates that with the recommended improvements in place, the Project is not expected to have an adverse effect on transportation capacity and mobility in the study area. More specifically, the TIA evaluates eight existing external intersections, an additional four future external intersections, and nine future internal intersections as part of the study area, as more specifically set forth in the TIA. The TIA study considers the Project in three phases of development: Year 2026 – Phase 1; Year 2031 – Phase 2; and Year 2050 – Phase 3. The TIA outlines existing traffic conditions in 2019 and considers future conditions - both with and without development, for each of these three phases.

ARTICLE III

A Fiscal Impact Analysis

Including Expected Economic Benefits and Costs to the County

As noted above, the Applicant conducted a FIA to evaluate the expected economic benefits and costs to the County relating to the Project (see **Exhibit D**). More specifically, the FIA includes three specific analyses:

- **Market Analysis** – an evaluation of the market opportunity for both residential and commercial land uses.
- **Economic Impact Analysis** – an evaluation of direct, indirect, and induced impacts on employment, wages, and economic output as a result of the Project.

- **Fiscal Impact Analysis** – an evaluation of the effects the Project would have on the County municipal service demand and budget.

A summary of findings which respect to each follows.

A. Market Analysis

In order to understand the housing landscape and determine the positioning of for-sale units for the Project, the FIA identifies competitive developments selling homes in the local market. Wilderness Shores and Lake of the Woods are the two main communities selling homes in the County located within the vicinity of the Project. Other competitive residential developments include Regency at Chancellorsville, a recently completed active adult community; Mineral Springs Plantation, Estate at Chancellorsville, and Thornburn Estates in Spotsylvania County, which offer large estate homes on larger lots; Pennington Estates, a small community of more moderately sized homes, but on larger lots, also located in Spotsylvania County; Fredericksburg Park, a Ryan Home community located near the heart of Fredericksburg; and New Post, which is the most value-oriented of the communities in Spotsylvania County.

Considering these competitive sets, with respect to the Project, the residential target market for the townhomes and smaller lot single family homes will likely consist of first-time, value-conscious buyers, with base pricing of the townhomes starting around \$280,000 and single family homes around \$310,000. The larger lot single family homes target market will be more varied, with “move-up” buyers and potential out-of-state market relocators. Prices will range from \$365,000 to over \$500,000.

As with the for-sale housing, the FIA examines rental apartment communities in the County and adjacent Spotsylvania County to understand current rental apartment market in the region. The only market-rate rental apartment community in the County is Round Hill Meadow located in the Town of Orange. Brittney Commons is an older rental apartment community located outside the core of downtown. The other three communities in the apartment competitive set include the Apartments at Cobblestone Square, The Haven, and Silver Collection at Celebrate. Based on these competitive sets, the rental apartments target market will be professionals who are not ready to purchase a home and individuals who are down-sizing. Rental rates will be approximately \$1.30 per square foot.

The FIA identifies shopping centers in the region larger than 100,000 square feet to understand where households in the region were going to shop. As reflected in the FIA, eight shopping centers containing over 5.4 million square feet of retail space are located just outside of a 20-minute drive from the Project in Spotsylvania and Culpeper Counties. As such, demand for retail space at the Project is likely to emanate from households living within a 20-minute drive from the Project. The analysis indicates that the retail space target market will consist of shops, restaurants, and services catering to people living and working in the local community. The pricing for retail space will be approximately \$18.00 per square foot.

B. Economic Impact Analysis

The FIA includes an economic impact analysis which measures the direct, indirect, and induced economic benefits the Project would have on the County from 2020-2030. These benefits are measured for two events – the impacts associated with new development construction and those associated with the ongoing operation of commercial development.

1. Construction Economic Impacts. Approximately \$290.8 million in construction spending in the Project results in the creation of 2,482 direct jobs and 837 indirect and induced jobs. In total, the FIA reflects that 3,319 construction jobs will be created to develop the Project in the first seven years of construction. Associated labor income is projected at \$151.5 million. For the Project, the value added for construction activities is projected roughly \$217.9 million, with \$156.3 million in direct value added. The total economic output associated with the Project would total \$401.6 million, with \$290.8 million in direct output.

2. Operations Economic Impacts. The cumulative total of annual retail sales at the end of 2030 are estimated at \$163.5 million. Total permanent employment associated with over \$163.5 million in cumulative annual sales between 2026 and 2030 generates roughly 1,237 new jobs in the County. Unlike construction jobs, which are typically temporary, the employment related to permanent operations is ongoing. Direct employment impacts equal 1,032 jobs. Approximately \$33.6 million labor income is generated by the associated employment levels. The total value added equates to over \$55 million at buildout and stabilized occupancy. The total economic output for the Project employment center will approach nearly \$105 million at buildout and full occupancy.

C. Fiscal Impact

The FIA also examines how specific County departmental budget expenditure or capital Project needs would be impacted by the introduction of new households and businesses in the Project. In examining these impacts, the FIA also estimates municipal tax revenue generated by the Project. FIA fiscal impact findings are summarized below.

1. Municipal Revenue Projections. By the year 2030, roughly \$9 million in real estate taxes will be collected from the Project. This represents approximately 55.3 percent of the \$16.4 million in total revenues generated by the project during the 2020-2030 projection period. The largest single source will come from new ownership housing, which will account for \$6.6 million. For every \$1 million in real property value, there is roughly \$67,096 in personal property value. Approximately \$2.7 million in personal property taxes will be collected from residential and commercial property in the Project, or roughly 17 percent of total revenues over ten years. The FIA projects local sales and meal tax revenues generated from the Project to be approximately \$2.5 million in the first ten years - roughly 15.3 percent of total revenues. The new fire and EMT tax would generate \$1.6 million in tax revenues by 2030 and based on the sale of over \$337 million in real property value, the recordation tax would generate over \$310,000 by 2030, or 1.9 percent of all revenues.

2. Municipal Expenditure Projections. The FIA projects that total fire department expenses could equal approximately \$2.2 million by 2030, with half of that amount - \$1.1

million, attributable to the Project and the remainder attributable to other growth in the area. This expense is offset by the \$1.6 million which will be collected by the County from the Project from the new Fire and EMT tax over the next decade. Over the ten-year projection period, the FIA estimates \$384,000 in public safety services from the Sheriff's Department associated with the Project. Based on the number of proposed new housing units, it is estimated that up to 352 new school-age students could be added to the County schools in grades K through 12. By 2030, the cumulative education cost will equal approximately \$5.4 million, with the peak occurring in 2030 at \$1.4 million. Approximately \$2.7 million in general government expenditures would be incurred during the ten-year study period, with \$2.2 million driven by residential households.

3. Net Fiscal Impacts. The FIA notes that municipal expenditures reflected in the FIA are portrayed as being directly related to the Project, which distorts the fact that existing households and businesses currently located in the eastern portion of the County have an unmet need for these services and will benefit from them. That prefaced, the Project is still projected to realize a net positive fiscal impact of approximately \$6.6 million over the first ten years.

ARTICLE IV **Impacts on the Provision of Public Facilities**

A. Fire and Rescue

The Project will have minimal impact on the County's fire and rescue facilities. The proposal contemplates the dedication of land for a public safety facility to house fire, rescue, and law enforcement services for the Project. All Project roads and building setbacks will allow for adequate travel space within the Project for emergency access to the improvements. Please see Article III of this Narrative for more information on municipal expenditure projections and net fiscal impacts.

B. Law Enforcement

The County Sheriff's Department has indicated that there is not a need for a police substation in the Wilderness Crossing area. While they believe the demand for public safety, traffic, and court services will rise with a growing population, the department does not believe that having a fixed operation center is the most efficient way to serve the area. Notwithstanding, the proposed public safety facility in the Project which is anticipated for dedication also would house law enforcement services. Please refer to the FIA attached as **Exhibit D** to this Narrative.

C. Schools

As noted in Article III of this Narrative, based on the number of new housing units projected in the Project, it is estimated that up to 352 new school-age students could be added to the County schools in grades K through 12. Approximately 38 percent would be elementary school-age students and 30.6 percent would be high school students. To offset impacts, the Project is planned to include land dedicated to use for a public elementary school.

D. Parks, Buffers, and Open Space

The County Parks and Recreation Department does not anticipate any changes in service levels due to the Project nor do they anticipate any capital planning needs or budgetary changes. Please see the FIA attached as **Exhibit D** to this Narrative. In addition, as discussed earlier in this Narrative, the Project is designed to include ample conservation areas and open space, as well as both active and passive recreational areas, strategically located within the Property.

E. Water & Sewer

The Project will be served by public water and sewer. The Project will be developed in several phases over a 30-year timeframe. Each phase of development will be coordinated with the County and appropriate authorities to ensure timely availability of public facilities and infrastructure.

F. Transportation

Please refer to the TIA and Article II of this Narrative for information relating to transportation.

ARTICLE V
AN ENVIRONMENTAL IMPACT ANALYSIS

The majority of the Property is wooded, with some fields and open areas. Portions of the Property along waterways including Wilderness Run on the southeast border of the Property and a tributary of the Rapidan River on the northwest corner of the Property, are within the Lake of the Woods Keaton's Dam Inundation Zone and the Lake of the Woods Main Dam Inundation Zone, respectively. A portion of the Property fronting the Rapidan River is within a 100-year flood zone. Please see the GDP attached as **Exhibit A** to this Narrative.

The Project's design minimizes the impact to the natural resources located on the Property, with the preservation of existing mature vegetation along Wilderness Run and the Rapidan River and other areas within inundation and flood zones. Other portions of the Property similarly maintain mature vegetation or be reserved for open space as depicted on the GDP. The Applicant will perform all applicable studies as is typically necessary for state and federal permitting for the Project prior to final site plan approval.

The Applicant anticipates close collaboration with the County during the permitting process to identify and manage environmental conditions and design criteria specific to the Project. Through the permitting process, the Applicant will implement all required mitigation measures and Best Management Practices as determined by the County and regulatory agencies.

ARTICLE VI
ANTICIPATED IMPACTS TO NEIGHBORING PROPERTIES
AND HOW THOSE IMPACTS WILL BE MITIGATED

In the proposal, all neighborhoods along Germanna Highway (Route 3) are planned with an anticipated building setback of 100 feet and anticipated parking setbacks at 50 feet from the right-of-way of Route 3. The setback requirement complies with the Ordinance and ensures the rustic landscape of the majority of the County remains intact with the development of the Project. The setback aims to minimize the impact of Germanna Highway (Route 3) to the residential development in the Town Center, while maintaining visual access to the commercial buildings from the highway.

It is crucial that the planted buffer along Germanna Highway follows the same principle to maintain visibility to commercial store fronts and signage. The parking areas are screened where possible with grouped plantings and berming that provide clear breaks at frequent intervals to allow for passing vehicular traffic to view through the buffer. For example, deciduous trees with higher growing limbs could be specified in combination with lower growing shrubs, grasses, and perennials or berming that will screen parking areas, while maintain an open view to the Town Center.

The Project follows the GWAP zoning strategy to provide appropriate natural buffering to the neighboring properties. An anticipated 100 foot buffer to maintain existing vegetation is planned for the western buffer adjacent to the existing agricultural properties. These buffers protect the natural landscape by reducing clearings while providing a dense buffer to minimize development impact of the Project on adjacent properties. The same anticipated 100 foot buffer is also planned along the north and east boundary of the Project, following the Rapidan River and Wilderness Run. Considering the environmental restrictions such as steep slope, flood plain, and potentially higher stream level caused by potential flooding or other impoundments, it is critical to establish such buffers to protect the natural area from disturbances and keep such areas undeveloped. All buffers will consist of existing trees and supplemental plantings where deemed necessary in the later site planning process in specific neighborhoods.

Exhibit A

Generalized Development Plan

Exhibit B

List of Parcels

	Owners	Parcel #	Current Zoning
1	King-Evans Culpeper Property LLC c/o Jan King-Evans	02400000000090	R-1 Conditional and C-2
2	KEG Associates III LLC	01300000000200	I2 Conditional
3	KEG Associates III LLC	01300000000190	I2 Conditional
4	KEG Associates III LLC	01300000000070	I2 Conditional, A and C-2
5	KEG Associates III LLC	0240000000002A	A
6	KEG Associates III LLC	02400000000020	A
7	KEG Associates III LLC	0130000000016B	A
8	Evans King 2 LLC	01300000000100	A
9	Evans King LLC	01300000000110	A
10	Evans King LLC	01300000000160	C-2
11	Evans King LLC	0130000000005B	A and C-2
12	Evans, Jan King et al	01300000000130	A
13	Charles B. King Jr., et al	0130000000006A	A
14	Charles B. King Jr., et al	0130000000006B	A
15	Charles B. King Jr., et al	0130000000006C	A
16	Charles B. King Jr., et al	01300000000060	A
17	Jan A K Evans Trustee, et al	01300000000030	A
18	Charles B. King Jr.	01400000000010	A
19	Jan A K Evans Trustee, et al	01300000000020	A
20	Jennifer Lee King, Trustee	0130000000003A	A
21	Spotsylvania County TM 3-A-3		RU

Exhibit C

Design Guidelines Manual

Exhibit D

Market Study and Economic and Fiscal Impact Analysis

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