

Orange County Planning Commission  
Orange County Department of Planning Services  
% Sandra Thornton, Manager  
128 West Main Street  
Orange, VA 22960  
(Transmitted via email)

October 8, 2020

Re: Signature Series Development, LLC (REZ 20-01)

Dear Ms. Thornton and Planning Commission,

The Piedmont Environmental Council (PEC) respectfully submits these comments, regarding the Signature Series Development, LLC request for rezoning (REZ 20-01) Tax Map Parcel 4-3 from C-2 Conditional and R-4 Conditional to Planned Development - Mixed Use (PDM).

**PEC requests that you deny REZ 20-01 in its current form. We recommend that commercial requirements be phased into this project as portions of the residential development are constructed.**

The Germanna Wilderness Area Plan (GWAP) intends to create:

*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 an economic engine for the entire County.<sup>1</sup>*

Prior to the construction of any commercial spaces, REZ 20-01 has requested the ability to construct 230 townhomes and 100 apartment/condominium units. In addition to the GWAP's intent, the Applicant's existing proffers, approved in 2013, stipulate that "No residential plats can be recorded, nor can any Residential Construction commence within the R-4 portion of the property until at least 25% of the Commercial Component has attained Occupancy Permitting (at least 59,375 square feet)." However, the applicant stated during the Oct. 1 Planning Commission meeting that "most commercial that we've contacted does not want to come unless there are already existing houses in place." This raises the question as to whether the applicant will ever develop commercial real estate associated with REZ 20-01.

The financial information provided in the application is inaccurate, as it dates back to 2011 and has not been appropriately updated to reflect current economic factors. Additionally, due to the Applicant's request to construct 330 residences prior to any commercial space, the financial information does not appropriately reflect tax implications; without the guarantee of commercial tax revenue, REZ 20-01 would result in a negative economic impact for Orange County. Nothing in the application guarantees any commercial would ever be constructed, regardless of how many units are ultimately built. Furthermore, the current cash proffer (\$300,000) suggests the county would bear the cost of up to 172 townhome units before receiving any offsetting funds.

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<sup>1</sup> GWAP, p.4

It is for these reasons that we request you deny REZ 20-01.

Thank you for taking the time to review the PEC's concerns on this important matter. Please feel free to contact me with any questions or requests for additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Hawk". The signature is written in a cursive style with a large initial "C" and "H".

Christopher Hawk  
Land Use Representative - The Piedmont Environmental Council  
11395 Constitution Highway  
PO Box 195  
Montpelier Station, Virginia 22957