



November 17, 2020

Mr. Scott Meyer, Planner III
Prince William County Planning Office
5 County Complex Court, Suite 210
Prince William, Virginia 22192

RE: Comment Response and Fourth Submission, dated July 8, 2020, Dar Al Noor Mosque Expansion, SUP2019-00046
LOCCA Letter dated October 25, 2019, Subject: Special Use Permit SUP2019-00046, Dar Al Noor Mosque Expansion;
LOCCA Letter dated November 22, 2019, Subject: Special Use Permit SUP2019-00046, Dar Al Noor Mosque Expansion; and,

Dear Mr. Meyer:

As you are aware, the Lake Ridge-Occoquan-Coles Civic Association's (LOCCA) Planning, Environment, Land-Use, and Transportation (PELT) Committee has reviewed and discussed the subject project on several occasions in coordination with the surrounding neighborhoods. We have also provided letters expressing our thoughts, concerns, and recommendations. Viewed in isolation, we believe this project has several redeeming and positive features — a center for religious worship, daycare, school, community event center, walk-in clinic, and other community activities. These services are a welcome and valued part of the fabric of our community and enhance quality of life for the patrons and the community at-large. However, this project cannot be viewed in isolation; we must take into account the overall vision and the expansiveness of the project on the available land and within the context of the surrounding neighborhood facilities and services. It cannot be viewed simply from the ground level.

We believe objective analysis must be done from both a strategic (regional) and ground-level (parcel-specific) view. Our rationale is that this is an immense and ambitious project planned for a small parcel of land, and the impact caused by a narrowly-focused view of the project will impact in no small way the surrounding environment, traffic safety, schools, and quality of life of not just the surrounding community but the broader Hoadley Road and Prince William Parkway transportation corridor region as well. We implore the applicant to take a long-range and broader view of its mission, vision and impacts in the context of harmonizing with its neighbors and the surrounding community.

Given the scope of activities being planned and the applicant's most recent submission with its-ambitious justification, we must conclude that the proposed facilities are intended to serve far more than the local community. But, with the scope of activities being planned, many citizens in the community have advised us that they believe that this is an aspirational vision for a regional project that lacks the land and space needed to function in harmony within the community and is, by any objective standard, an attempt by the applicant to stuff '60 pounds of sugar in a 10 pound bag.'



With that introduction, we have set forth below—sometimes in broad overarching terms—the issues that must be addressed through further analysis, discussion, and action before this project is considered by the Board of County Supervisors.

FIRM COMMITMENTS FROM THE APPLICANT:

After review of the Comment Response and Fourth Submission and after several meetings with members of the community closest to the project site, **LOCCA reserves its support of the project** until we can see some firm commitments by the applicant pertaining to specific metrics addressing traffic safety, public safety, parking management, outdoor and indoor recreational space for the projected school children, on-site storm water management, buffers, and overall site plan enhancements as explained further in this letter below.

DISCRETE PROJECT PHASING:

We believe the sheer scale of the expansion proposed by the applicant is staggering in scope. It seeks permission to expand prayer service attendance from 500 prayer mats to 1,800 per service (with multiple services to be held each day); establish a private school (for up to 200 students), a walk-in medical clinic, a youth and senior center, a pre-school/daycare center, an auditorium/event center/banquet hall (with associated kitchen services); provide for expanded parking and a bus/shuttle program; and erect an electronic changeable copy sign and a minaret. Each component will negatively impact the current and already dangerous traffic conditions near the site, and **warrants phasing requirements that would split the project into stages, conditioning the approval of each step on the success of earlier stages and prior results.**

Of additional concern are the potential uses that are not addressed in the proposal, and thus cannot be assessed in terms of their impact. Curiously, the language of the Supplemental Use Permit (SUP) provides for unlimited permitted uses absent any restrictions or time limitations, provided they are related to a religious institution or place of worship. Provision 2(a) and 2(b) expressly waives permit requirements and expiration periods for all future uses/structures once a permit is secured for the first structure. And uses that previously excluded—private school and daycare—in the original mosque permit are to be allowed under the SUP without any reference to the reasons why these uses were originally prohibited.

In our 50 year civic association involvement in reviewing projects in Prince William County, we have never seen such a large and ambitious expansion project on existing land where there was no established plan to acquire additional space. If this proposal is approved, the existing mosque will transition to a regionally prominent religious, cultural, educational and event center with all the attendant challenges to the community that will be posed by the dramatic increase for the benefit of those who will use these facilities. As such, it requires the proper space to allow such activities to safely occur and harmonize with the existing surrounding infrastructure.

TRAFFIC AND PUBLIC SAFETY CONCERNS:

The existing site, a 12,000 square foot facility, currently experiences a much higher rate of traffic accidents than the norm, as is evidenced by available accident reports compiled by the



PWC Police Department. The current statistics indicate that there are 89.9 crashes per mile at the un-signalized intersections surrounding the mosque vs. 6.6 crashes per mile for the remaining un-signalized intersections along Hoadly Road. This is over 13 times the rate at or near the mosque entrance areas compared to the remaining un-signalized intersections along Hoadly Road for the current level of use at the mosque using existing data. It is inconceivable to think that this known traffic hazard would not be proactively addressed by the applicant before approval of its proposal is even contemplated. One only needs to consider the situation at build-out, when the facility has over seven times the square footage and many more uses that would be anticipated for a full regional service center (with incoming and outgoing traffic at a variety of times throughout each day of the week), to understand why this is a terrible idea. Add to this the additional burden of special events, and it is clear that the usage levels and dangers would multiply even more dramatically.

We are at a complete loss to understand how the sheer scale of the proposal would be safely accommodated, considering that each part would negatively impact the current and already dangerous traffic conditions that have been clearly documented. The PWC Police Department, the PWC Department of Transportation (DOT), and the Virginia DOT (VDOT) have clearly documented the traffic safety issues at and near the current mosque site. Indeed, existing accident statistics on the current site send a clear message that serious proactive mitigation planning and phasing requirements must be included in the applicant's proposal.

We similarly fail to comprehend the absence of any monitoring or enforcement mechanisms in the proposal, nor any metrics by which to measure success or serve as triggers or boundaries, given the unprecedented magnitude and scope of the project. This troublesome omission would make meaningful enforcement impossible, and performance reviews entirely subjective. While the applicant points repeatedly to the police as the panacea to resolving its traffic and safety problems, the reality is that the police will not be present during daily expanded operations, and, in any event, are not a substitute for objective and binding enforcement provisions.

Accordingly, **we recommend splitting the project into phases and condition the approval of each step on the success of earlier phases and prior results**, including the possible acquisition of additional land to better accommodate the applicant's expansion plans.

TRAFFIC SIGNALIZATION IS CRITICAL:

A traffic signal has already been warranted by VDOT at Queen Chapel and Hoadly Roads absent any additional expansion. Therefore, it is our observation and firm **recommendation that there be a requirement for the applicant to wait on expansion until after a traffic signal is installed and a traffic management plan has been approved by the PWC Police Department**, the PWC Planning Office, PWCDOT, and VDOT. If expansion is permitted before a traffic signal is installed, there will likely be a significant increase in traffic issues, accidents, and possibly even fatalities. Most of these public safety issues should be proactively avoided with proper planning. No traffic accident or fatality to mosque attendees, the motoring public, or neighboring citizens is acceptable to the community, especially since these future tragedies can be eliminated by implementing upfront safety measures which will address these serious deficiencies that exist in the current proposal.



REVERSE CURRENT TRAFFIC PATTERN TO DECREASE U-TURN MOVEMENTS:

The current mosque ingress/egress directional flow is a source of traffic congestion and hazardous to Hoadly Road vehicular traffic. The mosque attendees currently enter Dar Al-Noor at the east opening of the property, which is at the intersection of Queen Chapel and Hoadly Roads, and they exit by turning right out of the west opening, crossing over two lanes of traffic within 500 feet in order to make U-turns at the intersection of Lost Creek Court and Hoadly Road. As previously suggested by VDOT, it is recommended that the applicant reverse the entrance/exit directional flow of the property traffic. This would eliminate the need for attendees to make unsafe U-turns on Hoadly Road that jeopardize drivers and block the Lost Creek community from the only entrance/exit to their neighborhood.

The PWC Police Department has submitted comments stating that, “...detail Officers routinely observe Mosque attendees making improper U-turns and other traffic infractions, which, on occasion, have contributed to crashes on Hoadly Road.” Off-duty PWC police officers are hired to direct traffic on Fridays and during special religious events. However, the mosque is open to attendees every day for multiple prayer times throughout the day, not just on Fridays or at few certain times. There is a constant flow of vehicles throughout the day Saturday through Thursday, and, without the police directing traffic or absent a traffic signal, the traffic hazards are significantly worse on these days. The proposed expansion, which includes a prayer hall, a K-8 school, a youth and senior center, a walk-in clinic, an event center/banquet hall, as well as other proposed and possible uses would add to these dangerous conditions exponentially.

Hoadly Road is an arterial road connecting Route 234 and the Prince William Parkway; therefore, it has a large volume of vehicles traveling at high speeds with a speed limit of 50 mph. Exacerbating the hazard to vehicles is a blind curve on Hoadly Road, which makes U-turns at Lost Creek Court dangerous to the mosque attendees and the drivers traveling on it. If the traffic pattern were reversed, the mosque attendees would be able to exit without requiring them to make dangerous U-turns. They could then come straight out at the place where VDOT has already, under current conditions without any expansion, warranted a traffic signal at Queen Chapel and Hoadly Roads, which is at the east opening of the mosque property.

Accordingly, **we recommend that this traffic flow reversal commence immediately.** The only physical alteration required to make this change would be to remove the orange plastic cones. Then, after a traffic signal is installed, the expansion could begin with the safe infrastructure in place to accommodate the significant increase in vehicles. In addition, a **‘No U-turn’ sign should be installed on Hoadly Road and Lost Creek Court for westbound traffic** where the visibility is only 560 feet, considering that there is already such a sign installed eastbound at the same intersection where the visibility is much greater at 1,714 feet.

PARKING NEEDS ARE SIGNIFICANT AND NOT ADEQUATELY PROVIDED FOR:

It is our observation that surface parking takes an enormous amount of space on the existing parcel, and yet there appears to be a deficiency of at least 331 parking spaces for the full projected needs of the congregation at build-out. This necessitates plans for off-site parking arrangements for large events with shuttle service for attendees. The current proposal calls for the use of the McCoart Government Center Stadium parking lot and perhaps other areas, such as



commercial parking lots with excess capacity, to accommodate additional cars. **We believe that this arrangement requires a Memorandum of Understanding (MOU) or some formal agreement between the parties to guarantee that such spaces will exist when required**, and that such arrangement will not conflict with the current usage of the McCoart Government Center, the stadium events, or other facilities being contemplated for off-site parking.

It is our assessment that currently planned outside recreational areas for the school children are not adequately provided for within the overall on-site expansion. This has resulted in some shared use being proposed, such as the outdoor basketball court being used as both a recreational and parking facility at certain times. The sheer magnitude of uses contemplated in the expansion suggests to us that formal arrangements, such as a MOU, need to be made with other parties in advance, and conditioned in the SUP to ensure off-site parking sites will be, in fact, provided to accommodate the projected usage levels. This means that a shuttle service will also be necessary, along with accommodations for parking for the shuttle buses to line up and drop off attendees.

Does the applicant provide the shuttle buses or make alternate arrangements to use PRTC, OMNI Ride, van rentals or other buses at off-peak hours? We suggest that everyone will be better served if such details are worked out and specified in the SUP conditions, and the associated agreements are firmly in place so we can be sure that the intended parking capacity is available as required.

BENEFITS OF STRUCTURED PARKING:

There is the option to provide for structured parking on a portion of the site, such as behind the structure. While recognizing that this is a substantial investment, we strongly believe it would bring about more benefit to the mosque and the community alike in terms of maintaining good will over time, given a more intense use of the existing acreage. It would also take substantial pressure off mosque attendees having to seek off-site parking and shuttling to the site from remote locations, as well as the community in terms of attendees competing with neighbors for the limited street parking that exists on adjacent residential neighborhoods.

Current police reports have documented incidents of attendees blocking residential driveways and creating ill-will with neighbors who cannot access or park in front of their property during these times. The expansion plans will certainly aggravate existing tensions with neighborhood overflow parking if this issue is not adequately addressed upfront in the SUP conditions. The basic message is that we all need to be considerate and good neighbors to each other. Structured parking provides the opportunity to minimize these confrontational situations by providing for adequate on-site parking for all patrons to the mosque.

As we have offered this suggestion on structured parking as one possible solution, we realize that no religious institution in Prince William County has structured parking at this time. However, as land becomes more valuable and applicants try to put more uses on existing parcels without purchasing additional land for expansion plans, this option will likely become one to turn to in the future. Indeed, we are seeing more applications for commercial and multi-family residential structures where structured parking is being incorporated as an element in the design. Accordingly, we submit that the applicant, with its ambitious proposal to build a regional



multiple-use religious, educational, cultural, and special events facility on such a small parcel, absent the acquisition of additional land, has created these unprecedented conditions and opened the door for further discussion on this topic.

INDOOR AND OUTDOOR RECREATIONAL AND EDUCATIONAL FACILITIES:

It is our observation that the K-8 students attending the proposed school will require on-site indoor and outside recreational facilities, given the anticipated number. The current plan seems to have adequate fenced-in play area for pre-school children and a shared use outdoor basketball court that can also serve as a parking lot to accommodate services. However, the indoor educational and recreational facilities are not currently specified. **As such, there is a need for planning more recreational space for all grades, and this should be a part of the SUP conditions.**

We suggest that the applicant look at PWC school recommendations for adequate indoor and outdoor recreational space for students, as well as teaching space metrics for classrooms and staff accommodations for guidance. These physical space and facility parameters might assist the applicant to emulate the public school space accommodations for school children and faculty, and serve as a basis for success in planning for classroom and recreational spaces. We recommend that the applicant consult with the Prince William County schools staff regarding the recommended recreational needs for indoor and outdoor space for the school children.

STORMWATER MANAGEMENT AND BUFFERS:

The current proposal calls for an underground cistern for storm water management (SWM) that will accommodate a 15-year storm event. **We recommend the applicant consider accommodating additional on-site SWM capacity.** The site would be better served to provide for on-site best management practices with swales on some of the downstream inside portions of the site adjacent to the buffer areas, and perhaps a modest on-site outdoor storm water pond to accommodate large storm events, which have become more frequent and intense.

We would also suggest that the applicant take advantage of the services available to them with our PWC arborist, Ms. Julia Flanagan, and consult with her regarding plantings in the buffer areas and the use of indigenous species. It is our understanding that the applicant has reached out to its neighbors, and that is how the current specific conditions for fencing and the buffer details were derived, especially on the backend of the site abutting the existing homes.

COURTESY REVIEW:

We appreciate the applicant being agreeable to having an SUP condition for a courtesy review with LOCCA/PELT and the surrounding community on architecture, landscaping, lighting, traffic flow, and overall site plan issues prior to approval of the final site plan. We submit that this courtesy review also should be in place for each phase of the project so that we can provide community input at each logical stage. It has been our experience that open, engaged dialogue with an applicant and neighbors will help to efficiently deal with and resolve issues, and promote good will among all parties.



ADDITIONAL ADJACENT LAND TO ACCOMMODATE THE VISION OF A REGIONAL CENTER:

Given the implied aspirational vision of providing a regional religious, educational, cultural and community services events center, it would seem prudent to look for the opportunity to purchase additional acreage adjacent to the existing mosque property to allow for the envisioned expansion in a responsible manner. **We encourage the applicant to change the traffic patterns to address public safety regardless of what vision is adopted.** There is a critical need to adopt a vision that either fits the existing acreage or expand the acreage to fit the applicant's preferred vision of the mosque as a future regional cultural hub for Northern Virginia.

Acquiring additional land will allow for substantial perimeter buffers, adequate on-site surface level parking (instead of having to turn to structured parking), generous outdoor accommodations for the school children, space for adequate on-site surface storm water retention and management (without resorting to underground cisterns), improved site aesthetics with some green space, and greater opportunity to provide for the anticipated uses of a well-designed regional facility that would better serve the long-term interests of both the applicant and the community.

Should the applicant choose to purchase additional land to accommodate its expansion plans, the timing of the project may need to be deferred. However, in the long-term, we view this delay as a very wise move and an investment in the future success of the Dar Al-Noor complex.

CONSOLIDATED RECOMMENDATIONS:

Given the above, we urge the applicant and the Board of County Supervisors to consider, in earnest, the suggestions we have offered in an effort to accommodate the applicant's vision adequately and successfully while ensuring good will and enhanced traffic safety within the surrounding community. The following is a consolidated list of recommendations that stem from the discussion in the preceding paragraphs:

1. Wait on expansion until after a traffic signal is installed and a traffic management plan has been approved by the PWC Police Department, PWC Planning Office, PWCDOT, and VDOT.
2. Split the project into phases, and condition the approval of each stage upon the success of earlier phases and prior results.
3. Reverse the entrance/exit directional flow of the property's traffic.
4. Install a 'No U-Turn' sign at the intersection of Hoadly Road and Lost Creek Court for westbound traffic.
5. Establish Memoranda of Understanding (MOU) or some formal agreement between the parties to guarantee that necessary parking spaces for off-site overflow parking will exist when required.
6. Develop an option to provide for structured parking on a portion of the site.
7. Plan for more recreational space for students at all grade levels.



8. Coordinate with the PWC schools for recommendations on sizing adequate indoor and outdoor recreational space, as well as teaching space metrics for classrooms and staff accommodations.
9. Plan for additional on-site SWM capacity.
10. Establish a SUP condition for a courtesy review prior to approval of the final site plan (and each phase) with LOCCA/PELT and the surrounding community on architecture, landscaping, lighting, traffic flow, and overall site plan issues.
11. Look for the opportunity to purchase additional acreage adjacent to the existing property.

We always welcome the opportunity to meet and discuss these items so that we can reach a common understanding and consensus among all stakeholders. We wish the applicant much success, and stand ready and available to provide helpful assistance in this regard.

Respectfully,

/S/

K. Jack Kooyoomjian, Ph.D.
President, LOCCA

/S/

Ms. Kathleen Harding
Secretary, LOCCA

/S/

Mr. Thomas F. Burrell III
Chairman LOCCA/PELT

/S/

Mr. Clancy McQuigg, PELT Committee,
LOCCA

cc: Board of County Supervisors (BOCS)
Ms. Rebecca Horner, Deputy County Executive
Mr. Stephen Donohoe, AICP, Acting Director of Planning Prince William County
Mr. Ricardo Canizales, Director of Transportation
Ms. Elizabeth Scullin, Chief, Transportation Planning & Programming Division
Ms. Jonelle Cameron, Walsh, Colucci, Lubeley & Walsh, P.C.