

Greetings BRCWRT Members and Friends - This edition of *Preservation Corner* focuses on the PW Digital Gateway initiative in Prince William County (PWC) and its attendant threat to Manassas National Battlefield Park and PWC's Rural Crescent.

PW Digital Gateway

In March 2021 a group of PWC landowners in the "Rural Crescent" revealed plans for an 800-acre data center development along Pageland Lane and adjacent to Manassas National Battlefield Park. Referred to as the PW Digital Gateway, the tentative plan strings together 27 parcels of agricultural land belonging to 16 property owners and envisioned to be developed by a single data center developer.



Aerial Map Indicating Land Parcels Proposed for PW Digital Gateway



The plan envisions constructing a large concentration of data centers on land that is outside PWC's Data Center Overlay District (property located within the Data Center Overlay District includes by-right data center development) and well within PWC's Rural Crescent. Based on the proposed location, adopting and implementing the plan will require PWC's Board of County Supervisors to approve a change (Amendment) to the Comprehensive Plan, approve rezoning requests for industrial use of the land and approve Special Use Permits for the data centers.

In addition to significant county land use issues, the envisioned plan is problematic from historical and electric power perspectives. The respective 27 land parcels are not contiguous and consist of four parcel clusters; two southern clusters north of U.S. Route 29 (Lee Highway), one on each side of Pageland Lane, and two clusters north of Thornton Drive on each side of Pageland Lane. The southern-most cluster is on the western side of Pageland Lane bordering MNBP (Brawner Farm and MNBP's northwest corner) and adjacent (contiguous) to Conway -Robinson Memorial State Forest, and the 2nd southern cluster is east of Pageland Lane and adjacent (contiguous) to MNBP (vicinity of Brawner Farm and Deep Cut) and to 116 acres of land along General Trimbles Lane that has been saved by the American Battlefield Trust (ABT). These two clusters include land (10 acres) that is within Manassas National Battlefield Park's legislated boundary. They also include land (107 acres) identified by the American Battlefield Protection Program (ABPP) as Battlefield Core Area of the Manassas Battlefield. (Manassas National Battlefield Park's current boundaries do not encompass all the designated Battlefield Core Area, though that land is eligible for incorporation into the park.)

The 27 land parcels are in proximity to an existing Dominion Energy transmission line along and paralleling Pageland Lane; however, that transmission line is "near or at capacity" meaning that any data centers built in the Pageland Lane corridor north of U.S. Route 29 will likely require new power substations and/or transmission lines to provide the necessary electrical power. Construction of new power sub-stations and/or transmission lines to support the plan would likely result in significant visual and visitor experience impacts at MNBP, particularly at the Brawner Farm site.

BRCWRT's May 10, 2021 letter to the PW Board of County Supervisors (BOCS) highlighted these concerns and strongly recommend the BOCS not approve development plans for data centers (or other industrial uses) in the Rural Crescent, including rezoning requests and/or Comprehensive Plan Amendments allowing such developments, especially when there is substantial acreage (approximately 3.200 acres) for "by right" data center development available within the designated Data Center Overlay District. PWC's Historical Commission expressed similar concerns in its May 11, 2021 letter to the PW BOCS, noting the proposed parcel locations proximity to MNBP and its opposition to any non-residential development adjacent to MNBP, such as data centers, industrial uses and large-scale commercial development, that may directly or indirectly negatively impact battlefield resources.



At its May 18, 2021 meeting the BOCS considered a proposal to initiate a "Zoning Text Amendment for Data enter Opportunity Zone Overlay District and at Subsequent Changes to the Comprehensive Plan and Design and Construction Manual related to data center development. The stated purpose of the actions in this proposal is to analyze increased infrastructure and new ways of developing data centers, while identifying new areas of the County where data centers would be appropriate. Blake Myers, representing BRCWRT, spoke at this meeting and highlighted the following:

- BRWCRT has significant concerns with any potential changes to the Zoning Ordnance and the Comprehensive Plan that would allow construction of data centers, or other industrial enterprises, in the Rural Crescent which contains some of the most historically significant land in Prince William County and in the region
- With respect to the staff recommendation under consideration, we have identified two key issues that apply regardless of what option the BOCS selects:
 - The recommendation and process outlined in the recommendation does not mention or include consideration of the Rural Crescent an area specifically established to maintain open space, protect historic landscape and control urban sprawl and the negative impact data centers constructed within the Rural Crescent would have on adjacent historic lands.
 - #2 Though the Board directed the process engage existing and new stakeholders, the sole stakeholder category identified in the recommendation is "industry stakeholders". No stakeholders from the history and historic preservation community are included - a significant oversight given the historic landscape present throughout PW County.
 - History and historic preservation stakeholder organizations exist in the County the County's Historic Preservation Division, Manassas National Battlefield Park, the Prince William Conservation Alliance and the Bull Run Civil War Round Table are a few examples. We recommend this stakeholder community be included as participants in future meetings with residents, landowners and industry representatives, and that at least two of the stakeholder organizations be included on the Development Ordnance Review Advisory Committee.

Following a lengthy discussion, the BOCS voted (5-3) to approve the proposal in the form of a study to be conducted by the staff, augmented by a consultant, with the results to be provided to the Board for consideration of potential amendments to the Overlay District, Comprehensive Plan and Design and Construction manual. The study is envisioned to be completed 6-9 months after consultant selection.

At its July 20, 2021 meeting the BOCS considered a request to initiate Comprehensive Plan Amendment #CPA2021-0004, PW Digital Gateway. This action is based on a request to amend the Comprehensive Plan to change the long-range land use designation for approximately 801.59 acres from AE, Agricultural or Estate, and ER, Environmental Resource to T/F, Technology/Flex, with a T-3 Transect. In the application, the Applicants are proposing, "PWC Digital Gateway", a Pageland Lane Technology Corridor for data center development; however, the T/F designation allows for additional land uses. The



application is comprised of 27 individual parcels, representing 16 applicants / owners. The parcels are grouped into four (4) separate geographical areas located on both the east and west side of Pageland Lane, south of Route 234, and north of Route 29.

At the July 20 meeting 72 speakers provided comments on the CPA initiation request, with approximately 50% supporting and 50% opposing CPA initiation. Blake Myers, representing BRCWRT, spoke and highlighted the following:

- BRCWRT's concerns remain driven by the proposed location of the data centers on land adjacent to Manassas National Battlefield Park, on land adjacent to land owned by the American Battlefield Trust and on land designated by Congress' American Battlefield Protection Program as Battlefield Core Area.
- Given the Data Center Overlay District study approved at the May 18, 2021 BOCS meeting has
 not been completed, initiation of the proposed CPA is very premature. This study and its resulting
 information is designed to inform appropriate amendments to the Overlay District, the Design &
 Construction Manual and the Comprehensive Plan.
- Two specific concerns with respect to the initiation request:
 - A considerable amount of land proposed for the PW Digital Gateway is part of the Manassas Battlefield - 10 acres are part of the Congressionally designated Park, but currently not within the Park's legislated boundaries, and 107 acres are within the ABPPdesignated Core Battle Area, land which is eligible for incorporation into MNBP and where American soldiers fought and died in the Battle of 2nd Manassas.
 - The continued lack of inclusion of history community stakeholders in this process is shocking. PWC's own Department of Historic Preservation and Historic Prince William have yet to be brought into these discussions and there has been no County contact or communication with Manassas National Battlefield Park in the development of the CPA initiation recommendation. The context presented for the CPA includes no mention of the fact that more than 100 acres of the proposed 800+ acres is Congressionally-designated Core Battle Area, nor does it mention the adjacent and contiguous proximity of much of this acreage to historic sites and vistas in MNBP a significant shortcoming in establishing a full and accurate context.

PW Historical Commission and BRCWRT member John DePue also spoke at the meeting highlighting the Historical Commission's concerns with the proposed location of the PW Digital Gateway and the degrading consequences that any data center development in this area would have on MNBP. John



reiterated the concerns expressed in the Commission's letter to the BOCS and noted that the Park is truly a national treasure, and the preservation of this treasure is a national priority and concern.

Following a lengthy discussion among the Board members and between the Board and PW Planning Staff representatives, the BOS voted (5-3) to approve the initiation of the CPA.

Readers of this column, and particularly readers who are Prince William County residents, are strongly encouraged to contact the PW Board of County Supervisors and/or their respective PWC District Supervisor and let them know your concerns with the PWC Digital Gateway initiative and the negative impacts that could result from approving the PW Digital Gateway project as currently envisioned.

PWC Board of County Supervisors:

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Thank you for your continued interest in, and support of, BRCWRT's preservation actions and activities. Stay strong, stay safe and stay healthy in 2021!

Blake Myers, BRCWRT Preservation Chair