

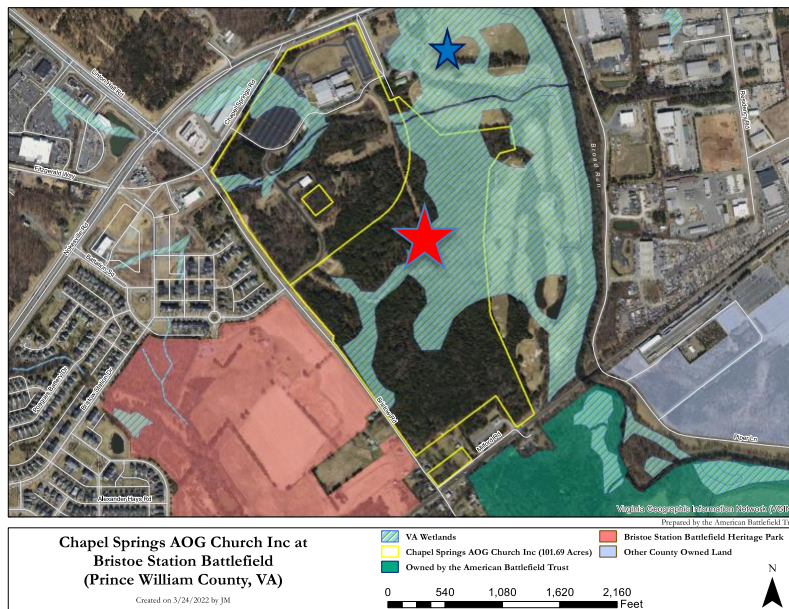
Bull Run Civil War Round Table (BRCWRT) Preservation Corner
October 30, 2023



Greetings BRCWRT Members and Friends. This edition of *Preservation Corner* provides updates on two highly significant threats to local Civil War Battlefields and the ongoing preservation efforts to protect the historic integrity of these battlefields - - the proposed Manassas Logistics Center development along Bristow Road and adjacent to Bristoe Station Battlefield Heritage Park, and the Prince William Digital Gateway (PWDG) Data Center rezoning applications for three data center complexes along Pageland Lane and adjacent to Manassas National Battlefield Park and in close proximity to Conway Robinson State Park.

Manassas Logistics Center Phase II Proposed Development (Bristoe Station Battlefield Heritage Park, Bristoe Station & Kettle Run Battlefields)

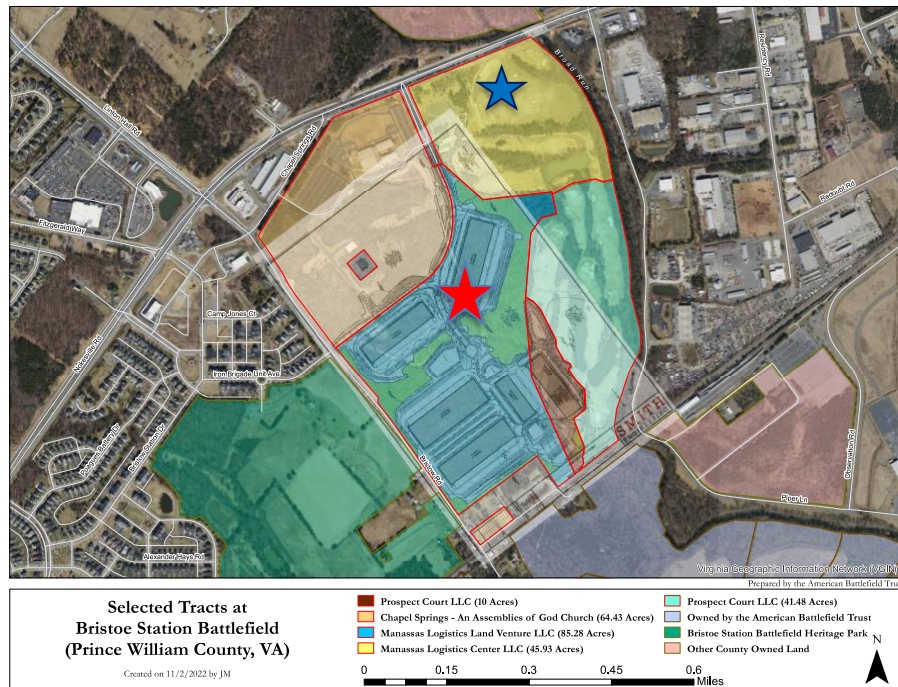
As previously reported, this industrial project, proposed by commercial real estate developer Trammell Crow Company (TCC) and its affiliate Manassas Logistics Land Venture, LLC, to be located along Bristow Road and directly adjacent to Bristoe Station Battlefield Heritage Park and to historic battlefield land owned by the American Battlefield Trust (ABT) (see parcel map, below).



Proposed Project Land Adjacent to Bristoe Station Battlefield Heritage Park

The proposed project is Phase II of a proposed Distribution Center where Phase I (identified by the blue star on the parcel maps) has been constructed and is in operation on the site of the former Golf Academy adjacent to Nokesville Road (Rt 28) and immediately south of Broad Run. The Phase II project plan includes six large warehouse and distribution buildings, similar in style and size to the Phase I structure, totaling 72,400 square feet and associated parking and loading areas (see depiction, below).

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Manassas Logistics Center Phase II Project Concept Overlaid on Parcel Map

Also, as previously reported, a National Historic Preservation Act, Section 106 Review of this project under the purview of the U.S. Army Corps of Engineers (USACE) began in December 2022

As a designated consulting party BRCWRT concurred with the amended USACE Adverse Effects Determination to historic properties, specifically the Battlefield Core Areas of the Battles of Kettle Run (August 27, 1862) and Bristoe Station (October 14, 1863), and archaeological site 44PW0971 that includes a civil war campsite, earthwork remnants and soldiers' graves. BRCWRT's input also noted that the proposed project would have a direct adverse effect on the historic viewsheds to and from the adjacent Battle of Bristoe Station Battlefield Heritage Park and adjacent historic battlefield land currently owned and preserved by the American Battlefield Trust.

At 2:30 pm on October 5, 2023, USACE conducted a Consulting Party 'virtual' kick off meeting for the Section 106 Consultation. The stated purpose of the meeting, announced at the beginning of the meeting, was to "...discuss the adverse effect determination that was made for the project..."; however, no advance materials were provided to consulting parties and the meeting structure/agenda was not provided until 12:03 pm on the day of the meeting. Accordingly, consulting parties were not prepared to engage in an informed discussion regarding proposed avoidance and mitigation measures that were presented by the developer during the meeting. Additionally, specific adverse effects determinations were not discussed, and many of the mitigation measures presented are not developer mitigation

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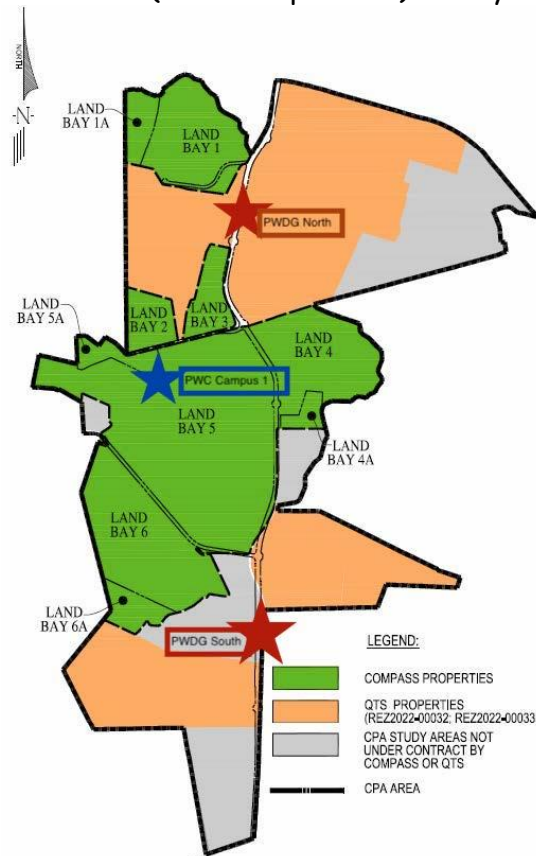
measures, but rather are requirements under Virginia state law and/or Prince William County zoning ordinance.

Subsequent to this kick off meeting, several consulting parties, including BRCWRT, submitted letters to the USACE citing their concerns with how the meeting was conducted, the minimal information provided to consulting parties prior to the meeting, the lack of discussion of specific adverse effects as determined by the USACE, and the 'uninformed' (inaccurate) presentation of developer mitigation measures. No USACE responses to these letters have yet been received, nor has USACE provided information as to when the next consulting party meeting may be scheduled.

Stay tuned.....

Prince William Digital Gateway (PWDG) Data Centers (Manassas National Battlefield Park and Manassas National Battlefield Historic District)

As previously reported, rezoning applications for three PWDG data center complexes along Pageland Lane - within the Manassas Battlefield Historic District and adjacent to Manassas National Battlefield Park (MNBP) - were submitted to PWC by QTS Realty Trust (PW Digital Gateway North, PW Digital Gateway South) and Compass Data Centers (PWC Campus One) in July 2022.



PWDG Land Parcels Proposed for Data Centers

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Prince William (PW) Board of County Supervisors (BOCS) Chair Ann Wheeler has scheduled the three rezoning applications for BOCS consideration and action during its December 12, 2023, meeting - the final meeting of the current Board prior to the seating of the new Board based on November 2023 election results. Ahead of this BOCS consideration and action, the Prince William County Planning Commission is scheduled to conduct public hearings and Commission considerations on each of the respective rezoning applications during their November 8, 2023, meeting.

On October 27, 2023, the Prince William County Planning Office released a staff report on each of the three rezoning applications (PW Digital Gateway North & PW Digital Gateway South [QTS], and PWG Campus I [COMPASS]). Citing the lack of specific information requirements for a rezoning application and long list of staff unanswered questions, the PWC Planning Staff recommended denial of each of the rezoning applications. Specific application shortfalls include:

- Lack of information on the siting and design of data center buildings
- Lack of information on the effects of the project on electrical infrastructure
- Lack of information the effects on nearby Manassas National Battlefield Park
- A jointly submitted master corridor plan consisting of overhead, illustrative sketches of building footprints, trees, creeks and sites for power substations, but do not depict or stipulate where the proposed buildings would actually be built
- Lack of detailed elevations of proposed buildings
- Applicants' inclusion of proffers that would allow them to make changes to the number and sizes of buildings, building architecture, landscaping and noise mitigation measures subsequent to rezoning application approval
- Applicants' inclusion of significant flexibility to dictate project landscaping, leaving PWC limited ability to ensure the projects would conform to the landscaping guidance in the PWDG Comprehensive Plan Amendment (CPA)
- Project plans submitted do not include routes for high-power transmission lines to serve the dozen or more power substations required for the data center complexes
- Applicants' requested waivers from having to obtain a Special Use Permit (SUP) to build data centers outside the County's Data Center Opportunity Zone Overlay District, but did not provide the requisite building footprints, site layouts and elevations necessary to consider granting the waivers

The planning staff noted that the some of the data centers proposed for PW Digital Gateway South are only a few hundred feet from the Manassas National Battlefield, and there remains a level of uncertainty as to the historic viewshed effect of data center buildings and infrastructure, especially with the lack of applicant commitment to effective screening buffers and landscaping, and the absence of site layouts and building footprints. There are also many unresolved issues with 10 different state

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and county agencies, who have raised specific concerns and questions since the initial rezoning applications were submitted in 2022.

Application shortfalls noted by the Prince William Conservation Alliance include:

- To date, the applicants have failed to complete the 2 phases of the archaeological review that were promised during the PWDG Comprehensive Plan Amendment (CPA) vote - Phase 1 has been completed with Phase 2 being proffered upon approval of the application
- QTS is proposing a 60-ft height restriction in PW Digital Gateway South rather than the 45-ft restriction in the CPA
- During the CPA public hearing, the applicants promised net-zero storm water runoff, yet their applications do not reflect this
- Lastly, the applicant site layouts are such that it's likely that the only area available for required power transmission lines may be within or through the Resource Protection Area (RPA), which protects our waterways

From a historic preservation perspective, the proposed data centers and the new infrastructure that would be required for their operation (including power transmission lines, power substations, sewer and water lines, and storm water management infrastructure), would have highly significant adverse effects on the historic viewsheds to and from Manassas National Battlefield Park (MNBP) and its historic sites. Additionally, the noise levels generated by data center operations and, when used, backup generator(s) operations would have significant adverse effects on the visitor experience at MNBP.

For those interested in doing so, please contact the **Planning Commission** (ahead of the November 8th Commission meeting) and share your concerns regarding the proposed PWDG Data Centers.

For those interested in attending BOCS meeting(s) and sharing their concerns regarding the proposed PW Digital Gateway Data Centers during Public Comment time, currently scheduled BOCS meetings include Nov 28 at 2:00 PM & 7:30 PM, Dec 5 at 2:00 PM & 7:30 PM, and Dec 12 at 10:00 AM.

Thank you for your continued interest in, and support of, Civil War historic preservation and BRCWRT's preservation projects, actions, and activities.

Blake Myers, BRCWRT Preservation Chair