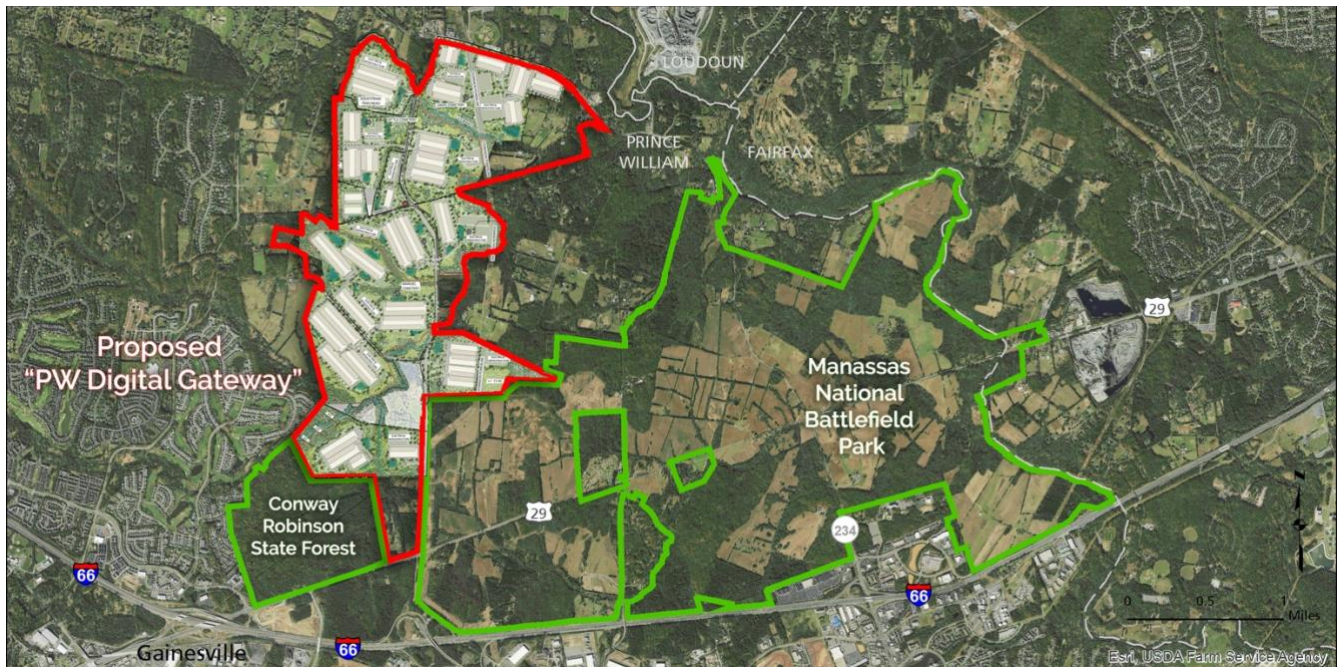


**Bull Run Civil War Round Table (BRCWRT) Preservation Corner**  
**December 26, 2023**



Greetings BRCWRT Members and Friends - This edition of *Preservation Corner* provides an update on the Prince William Digital Gateway (PWDG).

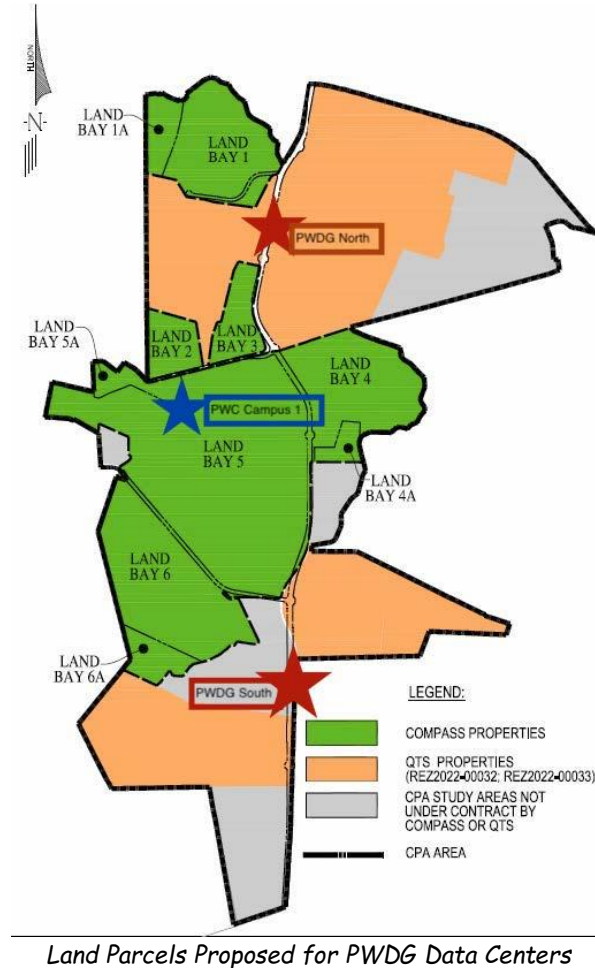
**Prince William Digital Gateway (PWDG) Data Centers Rezoning Applications, REZ2022-00032 [PWDG North], REZ2022-00033 [PWDG South, and REZ2022-00036 [PWC Campus 1] (Manassas National Battlefield Park and Manassas Battlefield Historic District)**



*Proposed PW Digital Gateway*

Following the Prince William County Planning Commission's November 8-9, 2023, 23-hour public hearing, the Commission voted to recommend denial of all three rezoning applications for the proposed Prince William Digital Gateway data centers. The 6-2 vote on each rezoning application came after three attempts by Commissioner Richard Berry (Gainesville) to defer a planning commission vote until after the county's planning office had sufficient time to review the 5<sup>th</sup> Submissions of the PWDG rezoning applications submitted by QTS Data Centers and Compass Datacenters on November 1, 2023.

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The three applications, the County 'Planning Staff's recommendation for denial, and the Planning Commission's recommendation for denial then went to the Board of County Supervisors (BOCS) for a PWDG public hearing scheduled by the BOCS for December 12, 2023.

On December 11, 2023, a nine-page letter written by the National Parks Conservation Association and the American Battlefield Trust, and signed by 33 local, regional and national nonprofit organizations, dedicated to preserving and protecting environmental, historic and cultural resources, and human health was sent to the PWC BOCS. The letter highlighted, in significant depth, the negative impacts that the PWDG poses for Prince William County, Virginia, and beyond, and urged the BOCS to vote to deny the PWDG data center applications. The cited negative impacts and shortcomings of the applications include:

- Direct and negative impacts to Manassas National Battlefield Park and Conway Robinson State Forest

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- Inconsistency with the PWDG Comprehensive Plan Amendment with respect to county parks, trails, open space, and wildlife corridors
- The lack of information with respect to sustainability, energy requirements and infrastructure, and direct and negative impacts on climate
- Direct and negative impacts of air pollution, carbon emissions, local water pollution and decreased water supply, utility rate increases, and public park land degradation
- Unknown, but potentially direct and negative, impacts on clean water and the Occoquan Watershed Reservoir
- Failure of the applicants to provide sufficient information or commitments to ensure the proposed development would come to fruition as described - an alarming shortfall for a project of this scale requiring massive infrastructure upgrades

On December 12-13, 2023, at the conclusion of a 27-hour session that included a 7-hour meeting of the BOCS with the Data Center Rezoning Applicants (QTS Realty & Compass Datacenters) and PWC Planning Office representatives, and a 20-hour public hearing with nearly 400 individual and organizational speakers the BOCS voted 4-3, with one abstention, to approve each of the rezoning applications. Among the organizational speakers were MNBP, the Prince William Conservation Alliance, the Coalition to Protect Prince William County, BRCWRT, the National Parks Conservation Alliance, and the American Battlefield Trust.



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*Rendering of the Proposed PWDG Data Centers depicting the proposed data centers' site schematics in relation to adjacent historic sites within the Manassas Battlefield Historic District, Manassas Battlefield National Park (MNBFP) and Manassas Battlefield Core Area land currently owned by the American Battlefield Trust and planned for eventual incorporation into MNBFP (courtesy of American Battlefield Trust).*

The BOCS's approval of the PWDG rezoning applications came despite recommendations from both the PWC Planning Office and PWC Planning Commission to deny each of the applications. Additionally, given the substantive changes to the applications and several proffers made since the Planning Commission's public hearing and vote on November 8, 2023, and during the December 12, 2023, BOCS meeting and public hearing, several speakers and Gainesville District Supervisor Bob Weir recommended the applications be sent back to the Planning Commission for re-consideration. That recommendation garnered no support from the Democratic members of the BOCS; thus, continuing BOCS Chair Anne Wheeler's strategy and rush to ensure the applications were acted on by the current BOCS before its

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term ends on December 31, 2023 - a strategy driven by the consensus that the majority of the Supervisors on the incoming (January 1, 2024) BOCS do not support the PWDG and that the new BOCS would likely not approve the rezoning applications.

With the rezoning applications approved, the next major step for the County will be consideration of specific site plans upon submittal by QTS and Compass, respectively. PWC's Land Development Division will oversee the site plan review and approval process.

Meanwhile there are on-going and potentially new legal actions that challenge the BOCS's actions regarding the PWDG. Approximately one year ago, the Oak Valley HOA and ten individual plaintiffs sued to reverse the BOCS's approval of Comprehensive Plan Amendment (CPA) 2021-00004, PW Digital Gateway that paved the way for the PWDG rezoning applications. That lawsuit is currently winding its way through the court system.

Other potential legal challenges under consideration include a potential legal filing by the Coalition to Protect PWC to negate the BOCS December 12<sup>th</sup> public hearing due to non-compliance with the county ordinance and state law governing public hearing announcements, and a potential legal filing by the HOA Roundtable.

The Coalition to Protect PWC asserts that the County violated Prince William County Ordinance Sec. 32-700.60(1) and Virginia Code §15.2-2204(A) as they pertain to the notice of the December 12<sup>th</sup> public hearing. PWC Ordinance Sec. 32-700.60(1) states that "Notice of a zoning map amendment or Special Use Permit shall be published once a week for two successive weeks (with not less than six days elapsing between the first and second publication) in a newspaper having general circulation in the County. Notice for both the planning commission and Board of County Supervisors may be published concurrently. Notice shall specify the time and place of the public hearing, which shall be held not less than five days nor more than 21 days after the second advertisement shall have appeared."

Virginia State Code §15.2-2204(A) states that the governing body may not "adopt any plan, ordinance or amendment thereof until notice of intention to do so has been published "once a week for two consecutive weeks," with "two successive weeks" being defined as "not less than six days elapsing before the first and second publication." (underlining added for emphasis)

In a related initiative, nonprofit organizations, homeowners' groups, and residents from across Virginia have joined forces to form a coalition calling for industry-wide data center reform. The *Virginia Data Center Reform Coalition* consists of more than 20 environmental, conservation, historic preservation, and climate advocacy groups, as well as representatives of communities and neighborhoods across the state. Together, they are urging the state to study the cumulative effects of data center development on the

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state's electrical grid, water resources, air quality, and land conservation efforts, and to institute several common-sense regulatory and rate-making reforms for this industry.



The Coalition's inaugural December 1, 2023, press conference highlighted several ways the data center industry in Virginia has failed to prioritize community concerns. Among them: proposing mega-campuses in inappropriate locations, such as near historic battlefields and cultural resources, schools, and residential communities; consuming excessive amounts of water with little oversight; installing thousands of large diesel generators, whose use threatens local and regional air quality; and compelling massive energy infrastructure upgrades that are paid for by ratepayers. The Coalition is seeking Virginia state government intervention – to require more transparency around land use decisions affecting the lives of Virginians and around energy and water usage that carries significant implications for both local communities and the Commonwealth. The coalition is asking the state to require data center developers to mitigate the negative environmental impacts of this industry and to place the cost of new transmission lines and power generation infrastructure required for data centers on the industry itself, rather than on Virginia's individual ratepayers.

The way forward for the PW Digital Gateway promises to be a long and winding road - - - stay tuned for future developments.

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

Blake Myers, BRCWRT Preservation Chair