



United States Department of the Interior

NATIONAL PARK SERVICE
Manassas National Battlefield Park
12521 Lee Highway
Manassas, Virginia 20109-2005

IN REPLY REFER TO:

Mr. Bryce Barrett
Planning Office
County of Prince William
5 County Complex Court
Prince William, VA 22192

December 3, 2021

Subject: Comments on CPA2021-00004, PW Digital Gateway

Dear Mr. Barrett:

On November 18, 2021, the National Park Service (NPS) received review materials for the Comprehensive Plan Amendment (CPA) for the PW Digital Gateway, encompassing approximately 2,133 acres of agricultural and residential land along Pageland Lane, stretching from Lee Highway to the south to Sudley Road to the north.

The subject area is located adjacent to the 5,071 acre Manassas National Battlefield Park (Park), including some lands within the Park's legislative boundary. The Park is visited by over 600,000 people every year. The NPS is charged with preserving these hallowed grounds and maintaining the historic landscape as a memorial to the over 4,000 men who lost their lives on these fields in 1861 and 1862. Furthermore, the application encompasses approximately ten acres within the Park's legislated boundary and approximately 570 acres that have been formally designated by federal or state agencies as significant to the Second Battle of Manassas. At the time it was fought on August 28-30, 1862, the battle was the largest ever fought in the western hemisphere.

Manassas National Battlefield Park strongly opposes this CPA because it is certain to have a substantial negative impact on historic resources both within and outside of the Park that are significant to the battle. The historic viewsheds and rural character along the western and northern boundary of the Park have been protected by the County's designation of the Rural Area. The lack of intensive development in these areas has also helped to temper any increase in the already stifling traffic that transits the park each day. Any change from the existing A-1 Agricultural Zoning along this boundary would have a direct negative impact on the park. Our more specific concerns are outlined below.

The CPA application encompasses hundreds of acres of land currently in agricultural use which have been designated as historically significant to the battle. As mentioned above, a 10-acre portion of the application area falls within what the United States Congress has designated as part of Manassas National Battlefield Park – lands which can and should be part of a National Park. In addition, not all areas where soldiers fought and died are within the Park boundary. Over 100 acres of the land under consideration have been designated by the congressionally authorized American Battlefield Protection Program as

part of the battlefield “core area.” These are lands where battle action took place and are typically thought of as “hallowed ground.” Changing the planned land use of these areas would inhibit the mission of the Park to preserve and honor the sacrifices of the 4,000 Americans who died at Manassas.

The Manassas Battlefield Historic District, which is listed on the National Register of Historic Places, encompasses much of the southern portion of the application area – totaling approximately 390 acres. This includes two historic structures at 6304 and 6312 Pageland Lane, one of which was used as a hospital during and after the battle. An additional approximately 190 acres have also been identified as being significant enough to be potentially eligible for inclusion on the National Register of Historic Places. In total, over a quarter of the land identified within the CPA application – the lands closest to the Park and generally south of Little Bull Run – are significant to the Second Battle of Manassas.

Moving to the specifics of the CPA application, the package contains numerous inaccuracies, omissions, and mischaracterizations. One of the primary arguments made by the applicants is that the area has lost its agricultural character; Sheets 4 and 5 display numerous images of the existing power line corridor which transects the application area. These images, however, are not representative of the overall character of the landscape, nor are they representative of the views from the park to the subject area. The applicant states that the battlefield has been “marred” by the presence of this transmission line. While the towers and lines certainly have a visual impact, the views from the park still maintain an entirely rural and agricultural feeling, to include distant but distinct views of the Bull Run Mountains.

While the application materials do recognize the presence and significance of the Park, they speak to the desire to exclusively minimize visual impacts from eight locations closest to the proposed development. The application indirectly references the county-developed Manassas Battlefields Viewshed Plan (2010). It is important to note that the 25 public vantage points identified in that plan are not necessarily the only locations and views of concern to the park, and that due to funding constraints, the analysis performed in the Plan was limited in scope. The viewshed study is an important planning document, but it should not be construed as being inclusive of all locations where adjacent development could have an adverse impact on the park.

The application also makes an assumption that development further away from the park will not be visible. In fact, we are very concerned about impacts to views from higher locations throughout the park that have not been identified by the applicants, to include places like the heavily visited Henry Hill Visitor Center. With the CPA application encompassing such a large area, we believe that an analysis should be conducted to determine the potential visibility from many of the high points throughout the park.

The NPS is also concerned that visual impacts appear to largely be dismissed in the CPA as something that will be addressed during the individual rezoning reviews. The Park requests that a comprehensive analysis be performed now to inform the CPA process.

Using existing technology like LIDAR (light detection and ranging) data, combined with basic computer simulations, the application should map topography combined with existing vegetation to determine which areas within the CPA application could be visible from the park, and at what heights. We have commented previously to the County that too much emphasis is placed on balloon tests alone. While we appreciate that the applicant previously performed some testing of the parcels immediately adjacent to the park, this did not provide conclusive evidence that structures would be entirely screened from the park. In fact, the limited testing that was performed demonstrated that structures at a range of heights would be visible at a number of locations within the Park

We would also note that the applicant has suggested that forested berming could be installed to screen proposed structures. In a number of locations where the subject properties are visible from the park, they can be seen just feet away from places like the entrance to the Brawner Farm Interpretive Center, or from park trails. Any earthen berms would need to be of a significant and likely impactable height. The planting of any trees on these berms – or anywhere else for that matter - would not provide any appreciable additional screening for decades. Further, the creation of artificial features like large earthen berms only further obstructs the current pastoral views from the park.

The Cultural Resources Chapter of the application briefly touches upon five historic cemeteries located within the application corridor, and states that “Proffered Conditions will be voluntarily offered by rezoning applicants in order to document, preserve and protect, as well as mitigate further adverse impacts to cemeteries.” If this is voluntary, we fail to understand how this provision is thus enforceable, particularly given the applicant’s reference that the cemeteries are not protected under current zoning. At least one of the referenced cemeteries are the graves of Civil War casualties. The application does not recognize an additional documented Civil War burial ground (archeological site 44PW0593) that may still contain soldier remains. It is likely that additional unmarked graves exist within the subject area.

The Open Space Chapter references the “robust natural ecosystem and open spaces of the Corridor” and recommends a system of contiguous forests, and the need to emphasize protection of the Park and Conway Robinson State Forest. It would be prudent to identify these corridors now, and not through later rezoning processes which will occur in a piecemeal fashion. We recommend that the southernmost portion of the application area be removed or otherwise designated as a preservation area, as it currently serves as a connection between the Park and the Forest. There are currently limited woodland corridors for animal movement in this part of Prince William County. The development proposed in this CPA would potentially sever any connection from the park to areas to the west.

Deforestation and increases in impervious surface are also of significant concern. Within the Bull Run Watershed, over 18,000 acres were developed prior to 2002, and by 2012 (the latest data available) an additional 9,000 acres were lost to development. The proposed change in land use would mean impacting even more lands, leading to further degradation of park streams and water quality.

It should also be noted that the applicant chose to highlight the Park's 2006 landscape rehabilitation efforts to the east of the Brawner Farm, denoting it as "Land Clearing by National Park Service," and stating that the most significant new clearing near the corridor has taken place in the park. This seems to imply that the Park's restoration of lands to native warm season grasses and shrubland habitat for ground nesting birds and other wildlife is comparable to their proposal to clear lands for data center use. Clearly that is not the case. Additionally, the ongoing clearing at Gainesville Crossing is far more recent.

Finally, the application does not speak to the audible impacts of data centers and their associated cooling equipment. Whereas visitors can currently hike miles of park trails along our northwestern boundary with only the faint whir of interstate traffic in the background, we are concerned that the constant buzzing of mechanical equipment will not only impact the visitor experience, but park wildlife as well.

This application leaves many questions unanswered. At the fully proposed build out of data centers, do the existing power transmission lines have sufficient capacity at their current sizing? Will significant rooftop mechanical systems and other fixtures count towards the maximum heights that will be proposed? If the preservation of environmental resources and historic resources are indeed a high priority for the applicant, why are certain sensitive areas included in the application? Why are they not explicitly called out for protection now, rather than recommending that they be addressed during site specific rezonings?

In conclusion, we oppose the drastic and adverse change in the land use adjacent to Manassas National Battlefield Park proposed in this application. Intensive development, particularly south of Little Bull Run, would have significant adverse effects on the Park and the resources we are charged with protecting. We would implore that this area be either excluded from the application, or otherwise designated as an area to be preserved at this time. We would also urge that the county complete the previously initiated update to the Data Center Overlay District *prior* to advancing this amendment proposal any further. This would give the county firm data on the need and appropriateness of a land use change such as this without having to rely upon this proposal, where many critical details are inaccurately represented or unaddressed.

We appreciate the opportunity you have provided us to review and comment upon this application. If you have any questions or need additional information, please feel free to contact the park at (703) 754-1861. As you are aware, I am concluding my time as Superintendent, and thus further questions may be addressed to acting superintendent Raquel Montez at Raquel_Montez@nps.gov.

Sincerely,



Brandon S. Bies
Superintendent

cc: Meika Fields Daus, Planning Office, County of Prince William
Aisha Medina, Planning Office, County of Prince William
Alexander Stanley, Planning Office, County of Prince William