



Emily Wolfson, Principal Planner
Christopher Perez, Principal Planner
Alexander Vanegas, Current Planning Manager

BY E-MAIL

Subject: Native American Cultural Resource Destruction Associated with the Prince William Digital Gateway

Dear Ms Wolfson, Mr. Perez and Mr. Vanegas:

The HOA Roundtable of Northern Virginia, a coalition of more than 100 HOA and Civic associations, including independent homeowners, in Prince William, Fairfax, Loudoun, and Fauquier counties, engaged Matthew "Maasaw" Howard, a Native American historian to provide a concise review of the history of indigenous people in the Gainesville area, with a focus on the Prince William Digital Gateway corridor.

The attached documents provide critical information on the destructive impact to historic and cultural resources from building the world's largest contiguous data center campus, known as the Prince William Digital Gateway (PW Digital Gateway), in Gainesville, Prince William County, VA. These destructive impacts pertain to historic sites of the American Civil War, postwar African American communities, and thousands of years of Native American culture, which is the subject of Maasaw's report. He opens with the central point, which is the incongruity of destroying the tangible elements of history *"...in place here and the already long-established importance of this County's storied history to American history and Virginia's history that so many people learn from and take pride in ... To create these 'memorials of history' and provide County residents with an outstanding cultural resource to learn about their history and heritage, as well as the false perception that 9 + miles of pedestrian and equestrian trails will somehow look better than the natural beauty that is already there, much of the original history and nature must be destroyed first."*

Maasaw mentions the rich African American history in the Gainesville area and credits freed slaves with settling the majority of it, building lives that would create a legacy that we know of the area today. He states *"Many of these people would also marry American Indians thus creating diverse mixed communities. Despite the hardships of poverty and discrimination these incredible families would help build Prince William County."*

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His concern is centered upon what is **not** addressed in the PW Digital Gateway 5th submission and archeological reports. This includes:

- the acknowledgement of the history of a people that have been in the Gainesville area for over thirty thousand years,
- America is 243 years old. Yet, the only important history people spoke of in these correspondences was the period after the Europeans arrived,
- as an example, an artifact was found, an arrowhead, classified by the applicant archeologists as "Lamoka", Cultural Period: 5,500 - 3,500 B.P., Middle to Late Archaic Period, Yet, *"This arrowhead is well over three thousand years old and can be as old as five plus thousands of years. This was found in the site area where the proposed data center could be built. Here we have a people that produced this arrowhead here (PW County) over three thousand years ago, yet all the conversations about the 'history' of the Gainesville area is confined to a few hundred years."*
- *The applicants' archeological reports fail to adequately address the significance and evidence of indigenous people in the project area. "It is time to get out of the racist mindset that history only began when the white man arrived. Especially when that history of a few hundred years cannot even begin to compare to the many, many thousands of years of indigenous history in the Gainesville area."*

Maasaw then offers a *"A Condensed History of Indigenous Peoples of Prince William County, Virginia"* naming tribes comprising the Manahoac Confederacy of Virginia which were dominant in Gainesville area during the first contact period (17th century) and concisely describes their history since that time. He concludes with the sentiment that *"it is time to start respecting our tens of thousands of years of history in this area called Prince William County, Virginia by including our history with the County's history. We will not accept any longer the deliberate attempt to exclude our history from conversation or the records. This is racist. It must stop. There are many people with American Indian heritage that contribute daily in a productive way to Prince William County. They deserve to have their heritage respected as well."*

In addition to the report provided by Maasaw, Manassas National Battlefield Park Superintendent, Kristofer Butcher, arrived at a similar conclusion, stating in his review of the Compass rezoning (attached) *"Within the project area there are significant resources that are not being properly assessed through the evaluations provided in the application due to the nature of resources associated with historically marginalized communities."* He further states *"It is here in the cultural landscape, the reflection of the way humans interacted with the land, that the history is found and preserved. These include resources like historic road traces that were utilized as a part of multi-modal community, in the archeological sites, in potential family cemeteries, and other subtle but significant pieces of the history."* On behalf of the National Park Service, he concludes *"As an initial evaluation and analysis of the landscape, a **Cultural***

Landscape Report needs to be conducted. This report describes the physical history, analyzes existing conditions, and recommends treatment actions to preserve, restore, or rehabilitate the landscape. This will give a clear understanding of the land and of these various intact features, whether archeologically or in the spatial arrangement of landscape features or in the built structures, and what is significant and should be preserved. **Until this study is completed, we cannot know what is extant and how much may be lost by a potential development of the site.**"

To further emphasize the need for extensive marginalized community research and archeology, we include a document prepared by Robert Barusefski & Frank Washington, *Historic African American Settlement and the Digital Gateway Western Prince William County, Virginia*. This is the type of Phase I documentation that should have been produced by the applicants to ensure comprehensive cultural primary research was performed.

Further, action strategies, both additional and revised, adopted as part of the Digital Gateway CPA on Nov 1, 2022 (#CPA2021-00004) have not been adhered to by the applicants and are a major reason as to why all of the above concerns still remain. There are as follows:

"DGCR 1.2 - Because of the overall historical and cultural sensitivity of the area, County staff should require rezoning, special use permit, and public facility review applicants to provide a Phase I cultural resource studies with the first submission of their application. If warranted, County staff should require the applicant to conduct a Phase II evaluation during review of the land use application. If a site or sites is determined significant, the first treatment option should be to preserve the resource in place with consideration for access to the public. Site or sites that fall within the following time periods should strongly be considered for in place preservation: Prehistoric Native American Settlement, Early National Period (1790-1829), Antebellum Period (1830-1860), Civil War (1861-1865), Reconstruction and Growth (1866-1916), World War I to World War II (1917-1945), The New Dominion (1946 to the present)."

The applicants did not provide Phase I cultural resource studies with the first submission of their application. To date, no Phase II evaluation has been performed during the time the applications have been under review. **As a result, the significance of culturally sensitive sites has not been fully determined according to the guidance outlined in the CPA.**

"DGCR 1.18 - County staff should require, where appropriate based on site-specific assessment, rezoning and special use permit applicants to conduct surveys, archaeology and historical research (including oral histories and other methods of historical research) to determine the existence of any cultural or historical resources on the application site related to Jennie Dean or any other history. Based on these surveys,

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archaeology and historical research, and the recommendations therein, and other relevant information, County staff should work with applicants on appropriate, site-specific mitigation measures.”

Because the site-specific assessments recommended in DGCR1.2 have not been performed with respect to marginalized communities, as discussed throughout this document and those identified as attachments, DGCR 1.18 has not been, and cannot be, fulfilled in accordance with the CPA.

Despite the applicant’s claims of extensive archeological work, and thousands of pages of documentation, the Digital Gateway is sited for one of the nation’s most diversely rich, historically sensitive corridors, directly adjacent to an established historic resource in the National Park. The extensive scope of the history to uncover, record, and acknowledge will take significant time to fully appreciate, and should come as no surprise.

The HOA Roundtable of Northern Virginia respectfully asks that the Digital Gateway rezoning applications be recommended for denial, as they are not in alignment with the CPA.

Sincerely,



Kathryn Kulick

Vice Chair, HOA Roundtable of Northern Virginia

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Enclosures (3):

American Indian Habitation History in the Gainesville, Virginia Region, Matthew “Maasaw” Howard, November 27, 2023 (Attachment filename: American Indian History Gainesville VA - M Howard)

Historic African American Settlement and the Digital Gateway Western Prince William County, Virginia, Robert Barusefski & Frank Washington (Attachment filename: Marble Hill Flat Iron Corner Thornton Lane History _ FOR PDF Barusefski&Washington.pdf)

Review of REZ2022-00036 H&H Capital Acquisitions Digital Gateway, S3, Kristofer Butcher Superintendent, Manassas National Battlefield Park, September 23, 2023 (Attachment filename: Manassas Battlefield Superintendent Response Letter.pdf)

cc:

Bob Weir, Gainesville District Supervisor

Jeanine Lawson, Brentsville District Supervisor

Yesli Vega, Coles District Supervisor