



## Plan Comments Report Manassas National Battlefield Reviewed w/Comments

<b>Plan/Case #:</b>	REZ2022-00036	<b>Date:</b> 09/27/2023
<b>Plan/Case Name:</b>	COMPASS DATACENTERS PRINCE WILLIAM COUNTY CAMPUS 1	
<b>Plan Case Address:</b>	5571 PAGELAND LN GAINESVILLE VA 20155	
<b>Reviewer:</b>	Butcher, Kristofer	
	703-792-7128	kristofer_butcher@nps.gov

The following items/issues were noted on your case. Please review and provide a letter responding to these comments, along with revised plans and proffers. Please be advised that staff might not identify all of the issues that arise during the case review and public hearing process. In addition, the solutions to the issues identified in this correction report might not be the only solutions, but are thought to be the most desirable solutions as determined by staff. Please note that any modifications will result in further review by pertinent agencies and staff, and could result in changes to the analysis and/or any recommendations.

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### Section I - Comments that Require Applicant's Response:

SEE ATTACHED

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### Section II - Questions/General Information:

SEE ATTACHED



United States Department of the Interior  
NATIONAL PARK SERVICE



Manassas National Battlefield Park  
12521 Lee Highway  
Manassas, VA 20109

In Reply Refer to:

Emilie Wolfson  
5 County Complex Ct., Suite 210  
Prince William, VA 22192

September 23, 2023

Subject: Review of REZ2022-00036 H&H Capital Acquisitions Digital Gateway, S3

Mrs. Wolfson,

The National Park Service (NPS) has reviewed the most recent submission (fourth submission) of the rezoning application for REZ2022-00036 H&H Capital Acquisitions Digital Gateway for potential impacts and effects to cultural and natural resources, as well as park operations to Manassas National Battlefield Park which is located directly adjacent to the battlefield's boundary. This submission has changed little from the previous submissions in regard to project design and potential impacts to the battlefield. The additional exhibits provided by the applicant only serve to illuminate previous comments and concerns by the NPS related to the impacts of the project on the battlefield, therefore this response will largely reiterate and clarify the comments from the NPS on the significance of and the effects to the battlefield and the associated historic resources.

The battlefield was established in 1940 to preserve and protect the land and resources associated with the First and Second Battles of Manassas to foster understanding and appreciation of the battles and their significance by providing opportunities for interpretation, education, enjoyment, and inspiration. The NPS is charged with preserving these hallowed grounds and maintaining this historic landscape in honor of the over 4,000 men who lost their lives on these fields in 1861 and 1862. The MNBP is a historic property in the National Register of Historic Places which includes historic resources that retain integrity and are contributing to the overall significance of the battlefield. The Manassas Battlefield Historic District encompasses the battlefield and additional surrounding properties that retain integrity of location, setting, feeling, and association with the historic events that occurred on the property before, during, and after the Civil War.

The proposed project is located directly adjacent to the battlefield and across multiple historic landscapes with significant ties to MNBP. The NPS has determined that the proposed project will likely adversely affect MNBP and directly affect numerous other historic resources associated with MNBP. Due to the need for additional research to identify other likely present resources, there are potentially additional historic resources that will be adversely affected.

### **Historic Resources**

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. Perhaps the singularly most important resource contained within and around the project area is the presence of the post-Civil War settlement community of African Americans like the Dean family. What is present within the project area is potentially an intact cultural landscape for this community. Cultural landscapes are historically significant places that reveal human interaction with the physical environment over time.

The history of these types of reconstruction era black communities is not ensconced in high style homes of grand architectural stylings but is rather often located in the everyday vernacular buildings from a structural standpoint. As vernacular structures, they are often not given consideration – as the QTS Architecture Survey reinforces for the other vernacular structures present – and are often lost. As previously stated, the history of this community thus becomes even more hidden, and one must look at the land itself to see it. 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.

To ensure that this project does not further the pattern of these past failures to preserve and protect this endangered piece of our nation’s history, further research is needed to understand this community and their use of the land so we can determine more fully what history still survives. Previously the park has requested that different methodologies and a different lens need to be applied to discover, document, and analyze the history as the traditional documentation methods do not always reveal the true nature of these types of communities and resources.

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.

## **Transportation**

Traffic through MNPB has been and continues to be the greatest and longest standing threat to the battlefield resources and to the visitor experience. The NPS has consistently expressed a desire to reduce or completely remove non-battlefield traffic through the park. In fact, Public Law 100-647, November 10, 1988, Section 10004(a) Congress directed that the Secretary of the Interior, in consultation and consensus with the Commonwealth of Virginia, the Federal Highway Administration, and Prince William County, shall conduct a study regarding the relocation of highways (known as Routes 29 and 234) in, and in the vicinity of, Manassas National Battlefield Park. While this was focused on the development of a bypass around the park, the effort was still to determine a way to allow for the necessary traffic needs while limit the effect of the traffic to the battlefield. The Commonwealth Transportation Board supported this in past years as long as there were replacement facilities for what becomes closed in the park.

While the battlefield has previously expressed support for initiatives to that would enable this, the fourth submission of this rezoning application does not appear to support or facilitate this goal. The proposed transportation improvements will not be substantial enough to serve as a replacement facility for Sudley Road (Route 234) through the battlefield. While this application does not have the authority to enable that closure, the proposed transportation design will not facilitate future road corridor expansion on Pageland Lane that would enable a replacement facility for the segment of Route 234 that runs through the battlefield.

The NPS requests that the proffered transportation improvements (that were originally offered) be designed to include the capacity needed to serve as a replacement for Route 234 through the battlefield. The designs should be updated to include the necessary means to provide necessary

capacity for the expected traffic associated with the project proposal and builds in future capacity to facilitate the administrative closure of that road. This would mitigate impacts to the battlefield from the proposed project.

## **Conclusion**

This proposed project will adversely affect the battlefield and the numerous historic resources outside of the MNBP legislative boundary and does not provide sufficient modifications to mitigate the impacts to these resources. In addition, the NPS believes that the full extent of the impacts are unclear. In order to protect and continue to maintain the resources entrusted to us, we will need additional research and investigation. It is in the interest of protecting and preserving the totality of our nation's history that deliberate and comprehensive steps are taken to ensure that vital pieces of the cultural heritage are given due consideration.

Prior to any further evaluation of this proposed project, the NPS requests that the studies, research, and investigations mentioned in this letter be completed. In addition, further investigation into potential mitigation to the affects to the battlefield are necessary in order to continue to protect and preserve these resources for future generations to enjoy and understand. Additionally, any of the aforementioned amendments proposed by MNBP in this letter should be adopted in future submissions. The outcome of these studies may additionally necessitate further amendments and mitigations which must be considered as a part of this as an informed iterative process.

The NPS is committed to continued participation in the process. For further coordination, please contact me at [kristofer\\_butcher@nps.gov](mailto:kristofer_butcher@nps.gov).

Respectfully,

Kristofer Butcher  
Superintendent