



## CURRENT PLANNING CASE INFORMATION

**Plan/Case Information:**

**Print Date: December 14, 2021**

<b>Case Type :</b>	Comprehensive Plan Amendment
<b>Plan/Case#:</b>	CPA2021-00004
<b>Plan/Case Name:</b>	PW Digital Gateway
<b>Plan/Case Address:</b>	12816 THORNTON DR CATHARPIN VA 20143
<b>Location:</b>	The expanded study area includes both sides of Pageland Lane and is generally bounded by Sudley Road to the north and Route 29 to the south.
<b>Request:</b>	The Applicant requests a Comprehensive Plan Amendment to create a Digital Corridor. On July 20, 2021, through Res. No. 21-445, the Prince William Board of County Supervisors initiated an amendment to the Comprehensive Plan for PW Digital Gateway to change the Long Range Land Use from AE, Agricultural or Estate and ER, Environmental Resource to Technology / Flex (T/F) with a T-3 Transect to include related impacts on supporting infrastructure and consider alternative comparable land use designation options that meet the needs of the Applicant and the priorities of the Prince William Board of County Supervisors. Additionally, the Prince William Board of County Supervisors also approved a friendly amendment to enhance the study area to include the entire corridor between Route 29 and Sudley Road in order to review in a holistic manner (traffic, land use, and environmental concerns), look carefully at the areas directly abutting Conway Robinson Memorial State Forest and the Manassas National Battlefield Park, and coordinate the review with the open space corridor concepts of the rural area (native plant buffering and sustainability) to preserve as much of the area as possible.
<b>Submission #:</b>	1
<b>Submission Acceptance Date:</b>	November 10, 2021

**Applicant Information:**

<b>Applicant/Agent:</b>	MARY ANN GHADBAN 6389 PAGELAND LN GAINESVILLE, VA 20155
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**Phone:**

**E-mail:**

**Case Planner Information:**

**Case Planner:** BARRETT, BRYCE

**Phone:** 703-792-8007

**E-mail:** BBarrett@pwcgov.org

# PLAN ANALYSIS

	<b>Comments Not Received</b>	<b>Reviewed w/Comments</b>
<b>Arborist</b>	0	1
<b>Community Development Manager</b>	1	0
<b>Conway Robinson Park</b>	1	0
<b>County Archaeologist</b>	0	1
<b>Health Department</b>	1	0
<b>Manassas National Battlefield</b>	0	1
<b>Manassas Regional Airport</b>	0	1
<b>Other</b>	1	0
<b>Parks and Recreation</b>	0	1
<b>Planning Case Planner</b>	0	1
<b>Service Authority (PLN)</b>	0	1
<b>Transportation Dept</b>	0	1
<b>VA Environmental Quality</b>	1	0
<b>Watershed Management</b>	0	1

# Plan Comments Report

## Arborist

### Reviewed w/Comments

<b>Plan/Case #:</b>	CPA2021-00004	<b>Date:</b> 12/09/2021
<b>Plan/Case Name:</b>	PW Digital Gateway	
<b>Plan Case Address:</b>	6385 PAGELAND LN GAINESVILLE VA 20155	
<b>Reviewer:</b>	Flanagan, Julia	
	703-792-7208	jflanagan@pwcgov.org

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 Watershed Management Comments

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#### **Section II - Questions/General Information:**

NO RECOMMENDATIONS DOCUMENTED.



## Plan Comments Report Community Development Manager Comments Not Received

<b>Plan/Case #:</b>	CPA2021-00004	<b>Date:</b> 12/14/2021
<b>Plan/Case Name:</b>	PW Digital Gateway	
<b>Plan Case Address:</b>	6385 PAGELAND LN GAINESVILLE VA 20155	
<b>Reviewer:</b>	Barrett, Bryce	
	703-792-8007	BBarrett@pwcgov.org

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:

NO COMMENTS RECEIVED AT THIS TIME

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### Section II - Questions/General Information:

NO RECOMMENDATIONS DOCUMENTED.



## Plan Comments Report Conway Robinson Park Comments Not Received

<b>Plan/Case #:</b>	CPA2021-00004	<b>Date:</b> 12/14/2021
<b>Plan/Case Name:</b>	PW Digital Gateway	
<b>Plan Case Address:</b>	6385 PAGELAND LN GAINESVILLE VA 20155	
<b>Reviewer:</b>	Barrett, Bryce	
	703-792-8007	BBarrett@pwcgov.org

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:

NO COMMENTS RECEIVED AT THIS TIME

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### Section II - Questions/General Information:

NO RECOMMENDATIONS DOCUMENTED.



## Plan Comments Report County Archaeologist Reviewed w/Comments

<b>Plan/Case #:</b>	CPA2021-00004	<b>Date:</b> 12/14/2021
<b>Plan/Case Name:</b>	PW Digital Gateway	
<b>Plan Case Address:</b>	6385 PAGELAND LN GAINESVILLE VA 20155	
<b>Reviewer:</b>	Patton, Justin	
	703-792-5729	jspatton@pwcgov.org

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 COMMENTS

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### Section II - Questions/General Information:

NO RECOMMENDATIONS DOCUMENTED.

December 14, 2021

To: Bryce Barrett, Senior Planner

From: Justin Patton, County Archaeologist

Re: CPA2021-00004, Prince William Digital Gateway

I completed my initial review of this Comprehensive Plan Amendment (CPA) application and offer my preliminary comments below. As new data about this application is offered or created through analysis, these comments may change or be refined.

This CPA project area is approximately 2,132.7 acres and is located along Pageland Lane between Route 29 and Sudley Road. The project area is designated in the County's Comprehensive Plan, Long Range Land Use Map as AE, Agricultural or Estate, and ER, Environmental Resource; and is located in the Rural Area. This CPA proposes changing the land use to Technology/Flex and Environmental Resource, with subsequent rezoning applications that would be exclusively for data centers.

The project area is located in the piedmont geographic region which consists of rolling hills, that vary from gentle slopes to quite steep slopes, in areas dissected by streams. The area still retains its rural look and feel. Pageland Lane bisects the project area and is wooded on either side in many areas of its alignment; and when not, pastoral views of extant farm fields and sometimes farm buildings are visible. Also visible are large lot single family residential subdivisions with most residences setback some distance from Pageland Lane.

The south portion of the project area is next to the Manassas National Battlefield Park (Park). The Park includes portions of both the First and Second Battles of Manassas but not all battlefield land. Each of these battles determined the outcome, or course, of the Civil War and are significant at the National, State and local level. The Second Battle of Manassas battlefield extends west and north from the current Park boundary, such that the south portion of this CPA is on battlefield land. The mission of the Manassas National Battlefield Park is to preserve and interpret to visitors both battles, in perpetuity. Current Park statistics show on average 600,000 visitors to the Park, annually.

The comments below are organized under the following headings of General which are directed throughout the project area, or directly address specific statements or proposals in this CPA. Afterwards, comments are grouped under a south sector, central sector, and north sector (Figure 1). These three sectors were derived from a combination of natural features (topography and streams) and subdivision boundaries. Natural features often influenced past historical events and subdivision boundaries often are evidence of previous large land holding boundaries, which represent historic land use. These sectors are a logical way to analyze impacts to cultural resources.

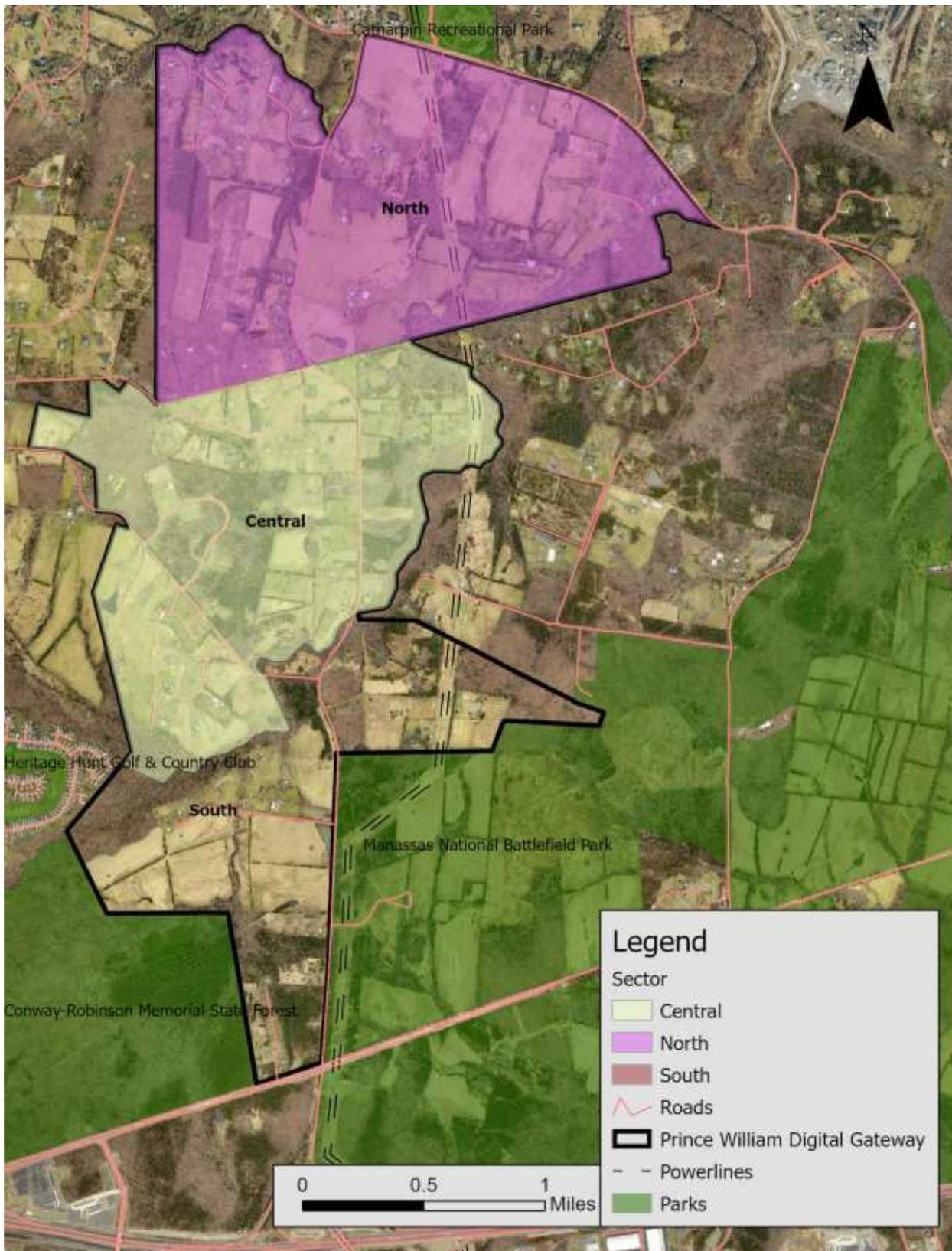


Figure 1. Project Area and Cultural Resource Analysis Sectors

## Findings - General

### Status - National Register of Historic Places and Virginia Landmarks Register

In 2005, the Manassas Battlefield Historic District (076-0271) was listed on the National Register of Historic Places and the Virginia Landmarks Register. This historic district includes the Manassas National Battlefield Park (Park) and land outside of the Park, including most of the south sector. The applicant states the electrical transmission lines, whose installation was completed in 2009 before the Study was completed, have degraded the integrity of this cultural resource such that data centers should be allowed. However, the Virginia Department of Historic Resources state site form, includes reanalysis of this resource that confirms its status as continuing to have integrity (see excerpts from the form below).

- “November 2014: Dovetail Cultural Resources Group recommends that the Manassas Battlefield Historic District should maintain its status as a National Register listed Historic District under Criteria A, B, C, and D.
- November 2018: At the time of this effort, inspection revealed that the park remains largely intact as it was when listed in the NRHP and last inspected. Therefore, D+A recommends this park historic district continue to be treated as eligible for listing in the NRHP.”
- “August 2020: Construction to widen Interstate 66 has further impacted the residential/commercial/light-industrial area that characterizes this area of the battlefield. Although the integrity of setting in this area of the battlefield is no longer intact, there is no recommended status change to the NRHP eligibility of this resource.”

### Viewsheds

The application materials recognize the presence of the Manassas National Battlefield Park (Park) and reference the Manassas Battlefields Viewshed Study (Study), which was completed in 2010. The applicant states the electrical transmission lines, whose installation was completed in 2009 before the Study was completed, degraded the integrity of this cultural resource such that data centers should be allowed. However, the Manassas Battlefields Viewshed Study (2010) included the current alignment and configuration of the electrical transmission lines located on the western boarder of Park. It also reported the following on page 63 of the report in the physical description of the Artillery Position (now known as S.D. Lee’s):

- “... perhaps the highest elevation of any viewshed within this study.”
- “The Artillery Position PVP sits at about 325 feet MSL. According to GIS data, there are few higher elevations within the park boundary. This allows for commanding views in many directions.”
- “Another view that is fairly extensive can be found when looking toward the southwest. This view encompasses open fields and high tension wires that are located on NPS property, and extends to woodlands growing at similar elevations far west of Pageland Lane. The crest of the Bull Run Mountains is visible when looking to the west, above the tops of the riparian plantings [emphasis added].”

Finally, while the applicant recognized the viewshed anchors in the 2010 Manassas Battlefields Viewshed Study these 25 viewshed anchors are not the only locations in Park with significant viewsheds. Since completion of the 2010 study, County staff has repeatedly requested viewshed analysis of other locations in Park, than just the 25 viewshed anchors.

Also, it is not uncommon to observe electrical transmission lines on farmland, which is an anecdotal observation based on decades of conducting cultural resource investigations throughout the Mid-Atlantic Region, Arkansas, Florida, Michigan, Ohio, and Texas.

In conclusion, this data points to the fact that the viewsheds towards the west and northwest from the Manassas National Battlefield Park retain a high degree of integrity, even though there is undeniably an impact from the existing electrical transmission lines.

### Data Center Impacts

Within this Sector, the Technology/Flex land use, rezoned to data center uses, have a high potential to adversely affect cultural resources in the following forms: indirect effects such as Audio, and Visual; and direct effects in the destruction of the resource. Transportation improvements necessary to implement land use and zoning changes, will likely have an indirect and direct effects on our history as well.

### Previous Prince William Board of County Supervisor Actions

The grant application that funded the Manassas Battlefields Viewshed Study was approved by the Board of County Supervisors in 2006 (RES NO 06-702). This study was completed in 2010 and its analysis included the current alignment and configuration of the electrical transmission lines located on the western boarder of the Park.

On October 16, 2007, the Prince William Board of County Supervisors approved classification of Manassas National Battlefield Park as a County Registered Historic Site, see CPA PLN2006-00454 (ORD NO. 07-93; Note: at that time a CRHS was labeled Designated Cultural Resources).

### Comprehensive Plan Policy

Comprehensive Plan Policy CR 4.6 states "Near areas identified as a County Registered Historic Site or County Registered Historic Site-eligible, ensure that the following measures are undertaken in consultation with the County:

- Development densities and intensities at the lowest end of the range shown on the Long-Range Land Use Map;
- A viewshed analysis to determine topographic and vegetative conditions that will provide guidance on appropriate building mass, heights and placement of buildings on the developing site so as not to negatively impact views to and from the CRHS;
- A sufficient amount of land preservation around the CRHS to maintain its historic integrity; and
- A buffering/tree preservation/landscaping plan to screen proposed development from the

CRHS.

CR-POLICY 2: Protect and preserve cultural resources that are important for documenting or demonstrating the prehistory or history of the County.

CR-POLICY 5: Identify and preserve known (but ill-defined) or expected prehistoric or historic resources through the application of standard archaeological modeling methods, reconnaissance level surveys, and use of appropriate maps and other documents.

CR-POLICY 6: Preserve, protect, and maintain known or discoverable cemeteries and gravesites, whether marked or unmarked.

### **Recommendations – General**

- 200 foot perimeter buffer on project area land elsewhere
- Phase I cultural resource studies, including metal detector survey, shall be required for each rezoning and special use permit application
- Phase II evaluation of potentially significant sites
- Sites determined eligible for listing on the National Register of Historic Places should be preserved in place
- Cemeteries shall be preserved in place (in situ) and a “preservation area” above and beyond the 25 feet prescribed in the Zoning Ordinance under 32-250-110. Should be implemented.
- Zoning - Elements of Section 32-509 Data Center Opportunity Zone Overlay District should apply to this project area, in particular the Data Center Design Standards Section 32-509-02.04. However, 32-509-02.04(E). (increased FAR) should not apply.

The following Comprehensive Plan policies should be applied to this plan area.

#### Comprehensive Plan Policy

Comprehensive Plan Policy CR 4.6 states “Near areas identified as a County Registered Historic Site or County Registered Historic Site-eligible, ensure that the following measures are undertaken in consultation with the County:

- Development densities and intensities at the lowest end of the range shown on the Long-Range Land Use Map;
- A viewshed analysis to determine topographic and vegetative conditions that will provide guidance on appropriate building mass, heights and placement of buildings on the developing site so as not to negatively impact views to and from the CRHS;
- A sufficient amount of land preservation around the CRHS to maintain its historic integrity; and
- A buffering/tree preservation/landscaping plan to screen proposed development from the CRHS.

CR-POLICY 5: Identify and preserve known (but ill-defined) or expected prehistoric or historic resources through the application of standard archaeological modeling methods, reconnaissance level surveys, and use of appropriate maps and other documents.

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CR-POLICY 6: Preserve, protect, and maintain known or discoverable cemeteries and gravesites, whether marked or unmarked.

**Findings – South Sector**

Aerial Photography, 1901 and 1904 maps, and the Virginia Department of Historic Resources database, VCRIS, shows several buildings and structures related to farming uses (see table below). Several historic farmsteads are west of Pageland Lane and third is east of Pageland Lane.

**Table of Recorded Cultural Resources**

State Site #	Name	Evaluation Status	
44PW0580	Railroad	Not Eligible	
44PW0593	Cemetery - Mass Civil War Burial	Not Evaluated	
44PW0594	1916 Pit Latrine	Not Evaluated	
44PW1931	Cemetery - Philips	Not Evaluated	
076-0137	Farm, 6312 Pageland Lane	Not Eligible	
076-0138	Farm, 6308 Pageland Lane	Not Eligible	
076-0271	Manassas Battlefield Historic District	Listed on NRHP/VLR	
076-0434	House, 6612 Lolan Drive	Not Eligible	
076-5106	Single Dwelling	Not Eligible	
076-5190	Manassas II Battlefield	Potentially Eligible	
	*Manassas National Battlefield Park	Classified as a CRHS	
*cultural resource adjacent to the project area			

The South Sector is bounded on the east by Manassas National Battlefield Park, which is classified as a County Registered Historic Site. That portion west of Pageland Land is in the Manassas Battlefield Historic District (076-0271) which is listed on the National Register of Historic Places and the Virginia Landmarks Register. Both areas west and east of Pageland Lane are in the Second Manassas Study Area as defined by the American Battlefield Protection Program. The area east of Pageland Land is in the Core area of Second Manassas. Areas west and east of Pageland Lane are also in the Potential National Register District as mapped by the American Battlefield Protection Program (Figure 2).

The staff historian at the Manassas National Battlefield Park provided information on Civil War activity that occurred on or that may have occurred in the South Sector. That portion west of Pageland Land, Pageland farm, may contain Confederate encampments that were occupied during August and September 1861 and associated burials from soldier deaths in camp. There may also be soldier burials and camps as a result from the adjacent field hospital that was in use during and after the Second Battle of Manassas. Confederate artillery batteries were likely located

in the area of the railroad bed (44PW0590), based on reports from relic hunters who found unexploded ordinance and dropped bullets. That portion east of Pageland Lane has potential for unmarked military graves and unexploded ordinance from a heated exchange of artillery fire on the morning of August 29, 1862.

The applicant conducted a balloon study on April 5, 2021, and on April 20, 2021. The results of the study have not been produced. However, the testing that was performed demonstrated that structures at a range of heights and from various locations outside the Park boundaries would be visible from various locations in the Park.

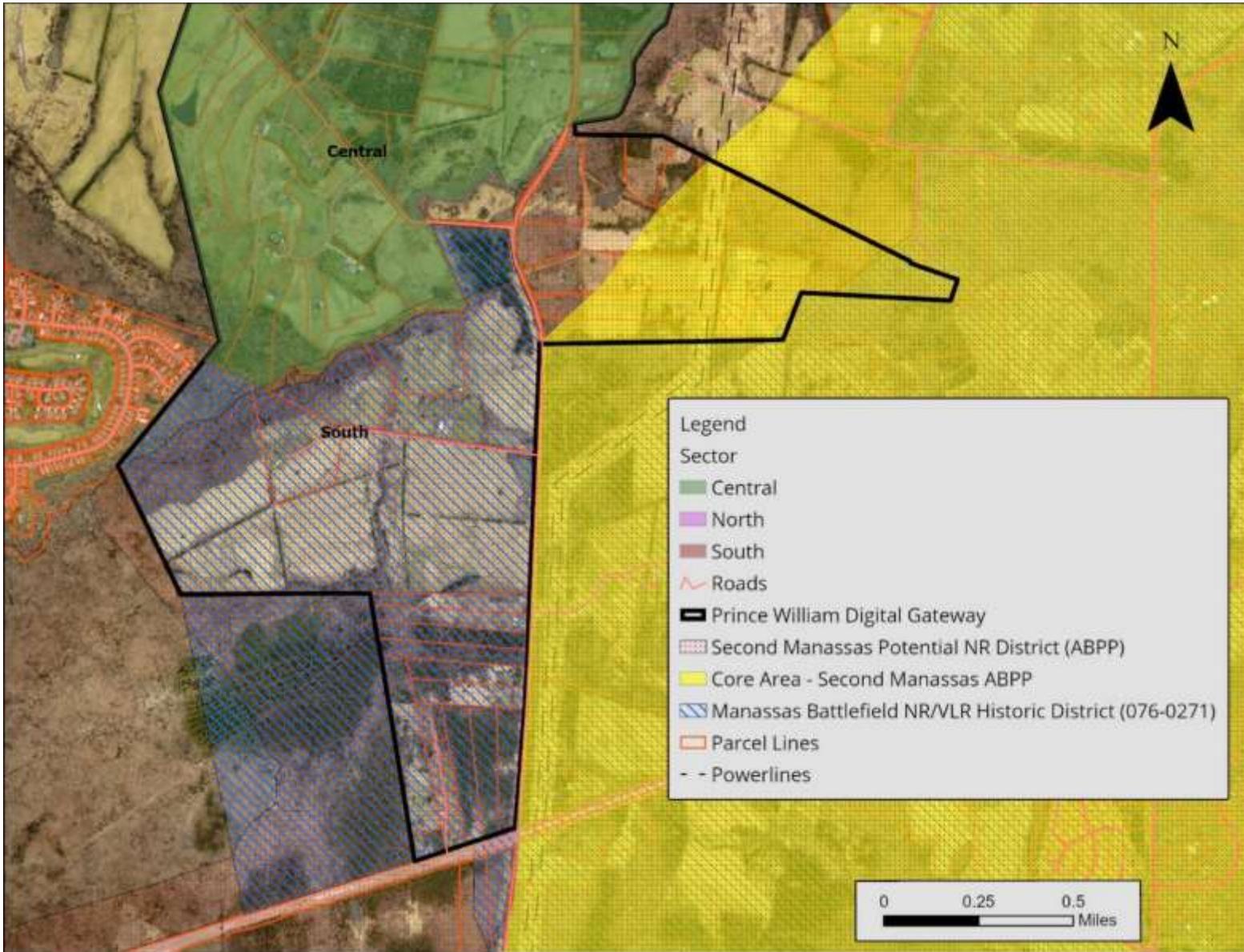


Figure 2. South Sector of Project Area

## Recommendations - South Sector

In addition to the recommendations under the General section above, I offer the following recommendations specific to the South Sector.

It is recommended that land in the Manassas Battlefield Historic District (076-0271) and all Core and POTNR land identified by the American Battlefield Protection Program remain as Agricultural Estate. The A-1 Zoning and AE Land Use designations are far less destructive to battlefield resources and the battlefield viewshed than the Technology/Flex land use and Data Center use. This is in accord with Comprehensive Plan Policy CR 4.6.

Consider re-evaluating the National Register status of 076-0137, Farm - 6312 Pageland Lane; and 076-0138, Farm - 6308 Pageland Lane.

If data centers are planned for this sector the following policies should be considered.

- Proposed impacts to the cultural resources in this sector warrant extensive GIS analysis during review of this comprehensive amendment application due to the potential degree of loss of resource integrity this proposal could have on Manassas National Battlefield Park (Park), the Manassas Battlefield Historic District (076-0271) and the Potential National Register land identified by the American Battlefield Protection Program.
- Substantial vegetative buffers adjacent the park, on project area land
- Building height limits
- Lighting/lumen limitations on all outdoor, non-residential, lighting
- Zoning - Elements of Section 32-509 Data Center Opportunity Zone Overlay District should apply to this project area, in particular the Data Center Design Standards Section 32-509-02.04. However, 32-509-02.04(E). (increased FAR) should not apply.
- Building orientation -the long axis of all buildings shall be oriented east to west, to reduce the mass of buildings visible to visitors on MNBP
- Preservation of all cemeteries in their place (i.e., no relocations of cemeteries)
- Phase I cultural resources survey and Phase II evaluations
- Phase III/Data Recovery on all eligible properties
- Public open space and trails
- Preservation of RPA/100-year flood plain as Parks and or public Open Space.
- Any proposed expansion of Pageland Lane, when the typical section is determined, shall be reduced to the minimum width possible to reduce impacts to the Park and the viewsheds. No intersections or streetlights shall be visible from within the Park.
- Public interpretation of this Sector's history

## Findings – Central Sector

Aerial Photography, 1901 and 1904 maps, show six farmsteads and one cemetery and a rumored possible Confederate graveyard in this Sector. The Virginia Department of Historic Resources (VDHR) database (VCRIS) recorded some of these farmsteads but not all (see table below). Three cemeteries are recorded in the Central Sector, not including the one referenced above: Manuel, Haislip and Pattie.

There is also a small sliver of the Manassas Battlefield Park (DHR 076-5190). The Settle Cemetery (also known as the Newman on some maps), the Marble Hill Slave and Cushing cemeteries are within this sector.

Eugene Scheels maps identified The Settlement (Catharpin) in this Sector. The Settlement appears to be a post-Civil War African American community. Also depicted on Scheel’s map is the Old Aldie Road. The African American Thornton (Eliot) School is across Thornton Road on the north side. Scheels map also shows a Page’s (Hoees) Mill just south of Artemus Road.

A large area that parallels Bull Run is within the Prehistoric Sensitivity layer. Large portions of this project area exhibit potential for finding prehistoric resources. No historic sensitive areas or County Registered Historic Sites are classified in this Sector.

**Table of Recorded Cultural Resources**

State Site #	Name	Evaluation Status	
NA	Cemetery - Manuel	Not Evaluated	
44PW0595	19th Century Road	Not Eligible	
076-0166	Cemetery - Pattie	Not Eligible	
076-0292	House Site & Cemetery – Haislip	Not Eligible	
076-5103	House – Thornton Drive	Not Eligible	
076-5105	Claas Farm, 5904 Pageland Lane	Not Eligible	
076-5190	Manassas II Battlefield	Potentially Eligible	

**Recommendations - Central Sector**

In addition to the recommendations under the General section above, I offer the following recommendations specific to the Southern Sector.

- Conduct archaeology to look for the Paige’s (Hoees) Mill
- Research the African American community called The Settlement (Catharpin)
- Explore the opportunity for an oral history project for The Settlement and the Thornton School
- Preservation of all cemeteries in their place (i.e., no relocations of cemeteries)
- Phase I cultural resources survey and Phase II evaluations
- Phase III/Data Recovery on all eligible properties
- Preservation of land for public open space and trails
- Preservation of RPA/100-year flood plain as Parks and or public Open Space.
- Public interpretation of this Sector’s history
- Conduct archival research on the possible Confederate graves, if warranted conduct a burial identification and delineation studies

**Findings – North Sector**

Aerial Photography, 1901 and 1904 maps, and the Virginia Department of Historic Resources (VDHR) database (VCRIS) shows several buildings and structures related to farming uses clustered primarily at 7599-12-3065, 7599-11-4569, 7499-70-3896 and 7499-84-1172. These are recorded as

the Marble Hill (076-5330), Lone Oak Farm (076-5321) and a Barn (076-5323), both of which appear to still be present today. There is also a small sliver of the Manassas Battlefield Park (076-5190). The Settle Cemetery (also known as the Newman on some maps), the Marble Hill Slave and Cushing cemeteries are within this sector.

Eugene Scheels maps identify communities called The Level and maybe Flat Iron Corner in the North Sector area and The Settlement might be in the sector area too. No information has yet to be found on The Level and Flat Iron Corner. The Settlement appears to be a post-Civil War African American community. Also depicted on Scheel’s map is the Old Aldie Road and Thornton (Eliot) School an African American school (1877-1938).

The land adjacent Bull Run is in the Prehistoric Sensitivity layer and these areas exhibit potential for finding prehistoric resources. A small portion of the Second Manassas Study Area as defined by the American Battlefield Protection Program is in the Sector area and overlaps with the Prehistoric Sensitivity area.

**Table of Recorded Cultural Resources**

State Site #	Name	Evaluation Status	
NA	Cemetery - Settle	Not Evaluated	
NA	Cemetery – Marble Hill (slave)	Not Evaluated	
44PW0596	Trash Midden, 1900-1924	Not Evaluated	
076-0186	Mount Pleasant, 12895 Livia Drive	Not Evaluated	
076-5102	House, 4904 Sudley Road	Not Eligible	
076-5190	Manassas II Battlefield	Potentially Eligible	
076-5321	Lone Oak Farm, 3505 Pageland Lane	Not Eligible	
076-5323	Barn, Pageland Lane	Not Eligible	
076-5330	Cemetery – Cushing; Farm, 12150 Marble Hill Lane	Cemetery Not Evaluated Farm Not Eligible	

**Recommendations - North Sector**

In addition to the recommendations under the General section above, I offer the following recommendations specific to the Southern Sector.

- Explore the opportunity for an oral history project for The Settlement and the Thornton School
- Research and conduct archaeology for the Thornton (Eliot) School, with landowner permission
- Preservation of all cemeteries in their place (i.e., no relocations of cemeteries)
- Phase I cultural resources survey and Phase II evaluations
- Phase III/Data Recovery on all eligible properties
- Preservation of land for public open space and trails
- Preservation of RPA/100-year flood plain as Parks and or public Open Space.
- Public interpretation of this Sector’s history



## Plan Comments Report Crime Prevention Police Review Completed

<b>Plan/Case #:</b>	CPA2021-00004	<b>Date:</b> 11/12/2021
<b>Plan/Case Name:</b>	PW Digital Gateway	
<b>Plan Case Address:</b>	6385 PAGELAND LN GAINESVILLE VA 20155	
<b>Reviewer:</b>	Trujillo, Juan	
	571-492-8503	Jtrujillo@pwcgov.org

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:

NO COMMENTS

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### Section II - Questions/General Information:

The Police Department has reviewed the application for CPA2021-00004 PWC Digital Gateway. The applicant requests a Comprehensive Plan Amendment to create a digital corridor. The Police Department does not believe this application will create a significant impact on Police calls for service.



## Plan Comments Report Fire Marshal's Office Review Completed

<b>Plan/Case #:</b>	CPA2021-00004	<b>Date:</b> 11/16/2021
<b>Plan/Case Name:</b>	PW Digital Gateway	
<b>Plan Case Address:</b>	6385 PAGELAND LN GAINESVILLE VA 20155	
<b>Reviewer:</b>	Little, Ernest	
	703-792-6883	elittle@pwcgov.org

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:

NO COMMENTS

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### Section II - Questions/General Information:

- 1.01- Fire/Rescue Stations 22 and 15 are the first due fire/rescue resources in the corridor.
- 1.02- The facility is outside the required 4 minute travel time for Basic Life Support and Fire from either Fire/Rescue resource.
- 1.03- The facility is inside the required 8 minute travel time for Advanced Life Support.
- 1.04- Fire/Rescue Stations 22 and 15 responded to 1,480 and 868 incidents in FY 21 respectively.
- 1.05- The workload capacity for Fire/Rescue Stations 22 and 15 is 4,000 and 2,000 incidents per year respectively.
- 1.06- Commercial use, such as data centers, will require fire flow of at least 2,500 gallons of water per minute at 20 psi residual pressure available at the site(s).



November 16, 2021

**TO:** Aisha Medina  
Office of Planning

**FROM:** Ernest H. Little, Fire Plans Reviewer  
Fire Marshal's Office

**SUBJECT:** CPA2021-00004 – PW Digital Gateway – Pageland Lane- Comprehensive Plan Amendment, Amendment without rezoning - submission 1

As requested, the Prince William County Department of Fire and Rescue has reviewed a copy of the subject application, proposed proffers, and site plan, and offers the following comments:

**Conditions:**

None

**Corrections:**

None

**Recommendations:**

- 1.01- Fire/Rescue Stations 22 and 15 are the first due fire/rescue resources in the corridor.
- 1.02- The facility is outside the required 4 minute travel time for Basic Life Support and Fire from either Fire/Rescue resource.
- 1.03- The facility is inside the required 8 minute travel time for Advanced Life Support.
- 1.04- Fire/Rescue Stations 22 and 15 responded to 1,480 and 868 incidents in FY 21 respectively.
- 1.05- The workload capacity for Fire/Rescue Stations 22 and 15 is 4,000 and 2,000 incidents per year respectively.
- 1.06- Commercial use, such as data centers, will require fire flow of at least 2,500 gallons of water per minute at 20 psi residual pressure available at the site(s).



## Plan Comments Report Health Department Comments Not Received

<b>Plan/Case #:</b>	CPA2021-00004	<b>Date:</b> 12/14/2021
<b>Plan/Case Name:</b>	PW Digital Gateway	
<b>Plan Case Address:</b>	6385 PAGELAND LN GAINESVILLE VA 20155	
<b>Reviewer:</b>	Anderson, Joshua	
	703-792-7335	Joshua.Anderson@vdh.virginia.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:

NO COMMENTS RECEIVED AT THIS TIME

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### Section II - Questions/General Information:

NO RECOMMENDATIONS DOCUMENTED.



## Plan Comments Report Historical Commission Pending

<b>Plan/Case #:</b>	CPA2021-00004	<b>Date:</b>	
<b>Plan/Case Name:</b>	PW Digital Gateway		
<b>Plan Case Address:</b>	6385 PAGELAND LN GAINESVILLE VA 20155		
<b>Reviewer:</b>	Patton, Justin		
	703-792-5729	jspatton@pwcgov.org	

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:** The Historical

Commission will be reviewing the the application proposal at its regularly scheduled meeting on December 14, 2021. Comments will be provided when available.

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**Section II - Questions/General Information:**

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NO RECOMMENDATIONS DOCUMENTED.



## Plan Comments Report Long Range Planning Review Completed

<b>Plan/Case #:</b>	CPA2021-00004	<b>Date:</b> 12/14/2021
<b>Plan/Case Name:</b>	PW Digital Gateway	
<b>Plan Case Address:</b>	6385 PAGELAND LN GAINESVILLE VA 20155	
<b>Reviewer:</b>	Mcgettigan, David	
	703-792-7189	dmcgettigan@pwcgov.org

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:

NO COMMENTS

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### Section II - Questions/General Information:

NO RECOMMENDATIONS DOCUMENTED.



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

<b>Plan/Case #:</b>	CPA2021-00004	<b>Date:</b> 12/10/2021
<b>Plan/Case Name:</b>	PW Digital Gateway	
<b>Plan Case Address:</b>	6385 PAGELAND LN GAINESVILLE VA 20155	
<b>Reviewer:</b>	Barrett, Bryce	
	703-792-8007	BBarrett@pwcgov.org

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 COMMENTS

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### Section II - Questions/General Information:

NO RECOMMENDATIONS DOCUMENTED.



# 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](mailto: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



## Plan Comments Report Manassas Regional Airport Reviewed w/Comments

<b>Plan/Case #:</b>	CPA2021-00004	<b>Date:</b> 12/14/2021
<b>Plan/Case Name:</b>	PW Digital Gateway	
<b>Plan Case Address:</b>	6385 PAGELAND LN GAINESVILLE VA 20155	
<b>Reviewer:</b>	Barrett, Bryce	
	703-792-8007	BBarrett@pwcgov.org

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:

NO COMMENTS

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### Section II - Questions/General Information:

NO RECOMMENDATIONS DOCUMENTED.



# City of Manassas Airport Director's Office

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December 8, 2021

**TO:** Aisha Medina, Planning Office, Prince William County  
**FROM:** Richard Allabaugh, Airport Operations Officer  
**SUBJECT:** CPA2021-00004 – PW Digital Gateway

This is in response to the site plan review transmittal dated November 10th. We have the following comments:

The proposed site development has the potential to affect the airspace for the Manassas Regional Airport. Two maps are attached to show the proximity of the proposed site and the approach surfaces of the airport. It is required that the developer complete the following:

1. Submit a 7460-1 form to the Federal Aviation Administration (FAA) during the design phase for each building within the approach surface for the maximum building height. Height should encompass all ancillary devices/AC units/antennas/etc that may be placed on the top of the buildings.
2. Submit a 7460-1 form to the Federal Aviation Administration (FAA) during the design phase for any proposed frequency usage to determine whether there is potential for interference with navigation aids.
3. A copy of the FAA Aeronautical Study numbers need to be provided to Airport Operations to confirm submissions.

Also, please note these general comments:

- The developer should be mindful of standing water and trash as they can be an attractant for birds. An increase in bird activity can be hazardous to transient aircraft.
- The developer should use best practices in regards to dust control. Large dust plumes can reduce a pilot's visibility and can potentially damage aircraft engines.
- If a crane will be used during the course of construction, the developer is required to submit a 7460-1 form to the Federal Aviation Administration (FAA) no less than 45 days prior to construction. Forms can be found at <http://oeaaa.faa.gov>. The purpose of this form is to (14 CFR Part 77.5c):
  1. Protect the developer from liability
  2. Evaluate the effect of the construction or alteration on operating procedures
  3. Determine the potential hazardous effect of the proposed construction on air navigation
  4. Identify mitigating measures to enhance safe air navigation
  5. Place new objects on navigational charts

- Prior to erecting a crane, please notify Airport Operations (703-361-5488) at least 72 hours in advance with the crane's operating hours, location, and maximum boom height. All cranes must be flagged and/or lighted appropriately.
- Stormwater detention ponds should be designed, engineered, constructed, and maintained for a maximum 48-hour detention period after the design storm and remain completely dry between storms (FAA Advisory Circular 150/5200-33B, FAA Advisory Circular 150/5320-5D).

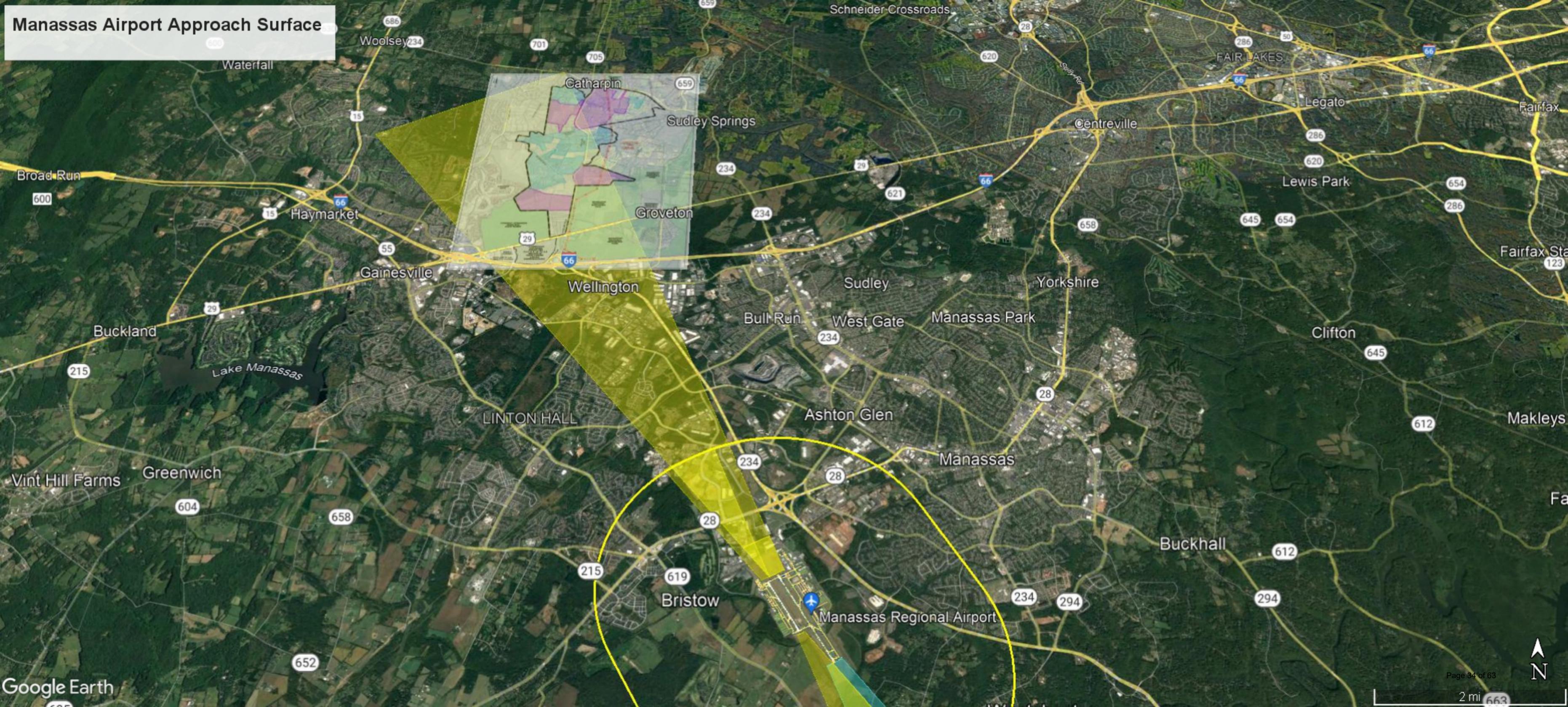
If you have any questions regarding these comments, please feel free to contact me.

Richard Allabaugh

[rallabaugh@manassasva.gov](mailto:rallabaugh@manassasva.gov)

703-257-8402

# Manassas Airport Approach Surface







# Plan Comments Report

## Finance

### Comments Not Received

<b>Plan/Case #:</b>	CPA2021-00004	<b>Date:</b> 12/14/2021
<b>Plan/Case Name:</b>	PW Digital Gateway	
<b>Plan Case Address:</b>	6385 PAGELAND LN GAINESVILLE VA 20155	
<b>Reviewer:</b>	Barrett, Bryce	
	703-792-8007	BBarrett@pwcgov.org

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:**

NO COMMENTS RECEIVED AT THIS TIME

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#### **Section II - Questions/General Information:**

NO RECOMMENDATIONS DOCUMENTED.



## Plan Comments Report Parks and Recreation Reviewed w/Comments

<b>Plan/Case #:</b>	CPA2021-00004	<b>Date:</b> 12/14/2021
<b>Plan/Case Name:</b>	PW Digital Gateway	
<b>Plan Case Address:</b>	6385 PAGELAND LN GAINESVILLE VA 20155	
<b>Reviewer:</b>	Pakkala, Patti	
	703-792-8004	PPakkala@pwcgov.org

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 COMMENTS

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### Section II - Questions/General Information:

NO RECOMMENDATIONS DOCUMENTED.



December 13, 2021

**TO: Bryce Barrett  
Planning Office**

**FROM: Patti Pakkala  
Department of Parks, Recreation & Tourism**

**RE: CPA2021-00004, PW Digital Gateway Comprehensive Plan Amendment  
Gainesville Magisterial District**

The Prince William County Department of Parks, Recreation & Tourism (DPRT) has reviewed a copy of the subject application and offers the following comments, relevant to the level of service (LOS) standards contained in the Parks, Open Space and Trails Chapter of the Prince William County Comprehensive Plan (adopted March 10, 2020) and park goals identified in the DRPT Parks, Recreation and Open Space Master Plan (adopted October 6, 2020).

**APPLICATION SUMMARY**

The applicant requests a Comprehensive Plan Amendment to create a Digital Corridor over a collection of parcels along Pageland Road in the Gainesville Magisterial District, extending from Sudley Road at the northern terminus to Rt. 29 at the southern terminus. The application area consists of 592 parcels and comprises approximately 2,132 acres of contiguous land. The application proposes to amend both the text and Long-Range Land Use Map classifications from Agricultural or Estate (AE) and Environmental Resource (ER) to Technology/Flex (T/F) and Environmental Resource. With this, the subject area will be removed from the “Non-development Area” and added to the “Development Area” by an adjustment in the Rural Area Boundary. This change is requested to make available, subject to rezoning, a “significant amount of additional land for new data center facilities”.

**PARKS AND RECREATION FACILITIES WITHIN THE DESIGNATED PARK PLANNING DISTRICT**

<b><u>Park Type</u></b>	<b><u>Park Name</u></b>
<b>Neighborhood</b>	None
<b>Community</b>	None
<b>Regional</b>	Catharpin Recreational Park James S. Long Regional Park
<b>Linear/Greenway</b>	Catharpin Greenway
<b>Natural/Cultural Resource</b>	Bushy Park
<b>School/Community Use</b>	Bull Run MS and Mountain View ES
<b>Trails</b>	Catharpin Greenway trail
<b>State/Federal</b>	Conway Robinson Memorial State Forest Park (includes trails) Manassas National Battlefield (includes trails)

## LEVEL OF SERVICE

The Prince William County Comprehensive Plan contains levels of service (LOS) standards for parks and recreation areas. The Department of Parks, Recreation & Tourism is responsible for parks and recreation services and facilities and has determined LOS standards from government requirements, professional and industrial standards, citizen surveys, and citizen expectations.

The Department no longer utilizes per capita standards for parks or park facilities as it is an unproven method for identifying recreational needs on a neighborhood level. The current LOS standards for parks and recreation facilities are based on metrics that consider park type, park service areas, park quality, and percentage of park acres county-wide. Per the Comprehensive Plan, the Department has identified a need for: an additional 5,000 acres of County-owned parkland; additional neighborhood parks throughout the county, which can be offset by HOA neighborhood park type features or pocket parks; and, upgrades to parks so that all parks obtain a grade “B” or higher based on the Department quality rankings.

Given that DPRTs LOS standards are typically applied to residential rezonings, quantifying the impacts of the proposed change to the long-range land use designation is difficult from a Parks perspective. Overall, however, there are several goals and strategies identified in the Parks, Recreation & Tourism Chapter of the County’s Comprehensive Plan which DPRT believes should still be considered with any development that occurs in this area of the County. With that, below we have provided the Parks, Recreation and Tourism policies and action strategies from the County Comprehensive Plan, that we believe are applicable to this application and that will need to be considered in regard to all future rezoning applications within this corridor, regardless of land use.

## PARKS, RECREATION & TOURISM APPLICABLE ACTION STRATEGIES

The applicable Parks, Recreation and Tourism policies and action strategies are provided below along with notes (*in italics*) that highlight the potential future park/parkland implications as they might pertain to approval of this application.

**PARK-POLICY 1: Retain and acquire a minimum of five percent (approximately 10,000 acres) of the total area in the county (excluding acreage of Marine Corps Base Quantico) for County-owned parks and historic preservation sites, including natural/cultural areas used for the protection of resources, environmental corridors, and the county’s trails and blueways.** (*Note: DPRT should continue to review all future rezoning applications within the identified corridor to determine whether there are any proposed parks, recreation and/or tourism impacts*).

**PK 1.1** Actively seek to acquire fee simple interest in property or easements – through land dedication, purchases, grants, and donations – that is suitable for creating new parks or expanding the boundaries of existing parks. (*Note: DPRT is seeking to extend the Catharpin Greenway to Pageland Lane and formalize trail connections – bike, ped, and equestrian – from Catharpin Creek, through Conway Robinson State Forest, and to Manassas National Battlefield; in addition, DPRT is in need of additional community park acreage in this area of the County*)

**PK 1.5** Actively seek to acquire and preserve parkland along identified greenway and blueway corridors to provide a buffer to sensitive habitats, continuous green corridors for wildlife,

preservation of cultural resources, increased acreage for passive recreation, and/or increased trail connectivity between existing parks and other nodes of activity in Prince William County and adjacent jurisdictions. *(Note: See notes above regarding extension of Catharpin Greenway and bike/ped/equestrian connectivity.)*

**PARK-POLICY 3: Encourage the preservation of private lands and their development, where appropriate, to provide adequate park and recreation facilities, and open space, within new developments.** *(Note: County should continue to seek open space preservation in conjunction with data center or similar development.)*

**PK 3.3** Plans for new mixed-use commercial/office development or redevelopment should incorporate usable open space (neighborhood park-like area, urban/pocket park, community garden, etc.) for the benefit of nearby residents, employees, or customers. Usable open space is open space that can be used for active or passive recreational purposes that is outside of environmentally sensitive land, stormwater facilities, resource protection area, wetlands, steep slopes, or 100- year floodplain. *(Note: Bicycle and pedestrian connectivity is desired in all new developments, as well as creating recreation opportunities for residents/employees, and expanding trail access to parks and recreational facilities within the service area of the development.)*

**PK 3.4** During rezoning and special use permit applications, as is consistent with applicable law, and the DCSM, encourage developer to mitigate the park and recreation impacts of their proposed development. *(Note: See above regarding bike/ped connectivity, employee/resident recreation opportunities, and increased trail access).*

**PARK-POLICY 4: Recognize that the Federal, State, and regional parks located within the County are a valuable asset to our community and our citizens and, as such, should be protected.** *(Note: County should continue to protect resources and viewsheds in and around all parks within the county.)*

**PK 4.1** Coordinate, with the respective land management agencies, to align our park planning efforts with the preservation of these lands and where appropriate provide connectivity to park and recreation facilities, trails, trail heads, and open space. *(Note: See previous note regarding DPRTs desire to expand and improve bike, ped, and equestrian access between the Catharpin Greenway, Conway Robinson State Forest, and Manassas National Battlefield.)*

**PK 4.2** Encourage sensitivity to the type of developments proposed surrounding these park properties in terms of view sheds, access, and traffic. New developments should be encouraged to mitigate any incompatible uses. *(Note: Important given proximity of proposed development area to County, State and Federal parks and recreation lands and resources.)*

**PK 4.3** Identify future economic development opportunities that can result from the additional recreational resources that these parks provide, as well as the tourism visits that they generate within the county. *(Note: Important given proximity of proposed development area to the identified County, State and Federal parks.)*

**RECREATION POLICY 1: Create a dynamic parks and recreation program by providing quality active and passive recreational facilities and programs of a mix and variety to meet the needs of county**

**residents.** *(Note: This includes atypical facilities such as outdoor gathering and recreational spaces for employees, pocket parks, wellness parks, etc.)*

**REC 1.3** Expand and enhance the County’s recreational trail system to provide a world-class resource for residents, a regional draw, and an economic driver for the County. Complete this strategy by developing diverse trail-based recreation opportunities such as advanced mountain bike experiences and long-distance land and water trails. *(Note: See previous note regarding DPRTs desire to expand and improve bike, ped, and equestrian access between the Catharpin Greenway, Conway Robinson State Forest, and Manassas National Battlefield; also, the need for additional community parks within the Gainesville Magisterial District.)*

**REC 1.5** Coordinate with Federal, state, local, and regional park partners, and land management agencies in the county to provide extended recreational programs, and connections to the County’s recreational trail system, and where an entrance fee is charged seek to allow no/low-cost access for county residents to these facilities. *(Note: Same as above.)*

**REC 1.6** Increase water-based recreational access and/or opportunities along the Potomac and Occoquan Rivers and along other public waters in the County; and, where appropriate, seek to preserve/protect lands adjacent to the county’s blueways (i.e., streams, rivers, lakes) to help create a network that integrates the County’s recreational trail system with the blueway corridors. *(Note: As applicable to the Catharpin Greenway corridor.)*

**REC 1.8** Develop strategies to provide programs, services, and recreational infrastructure to directly improve the health outcomes of Prince William County’s residents. The 2016 Greater Prince William Area Health Assessment has identified three categories of public health needs within the County: Substance abuse and mental health; obesity, access to healthy foods, and physical activity; and access to health care. The County is uniquely positioned to address these issues through innovative programs, new park development, and continuing partnerships with the health care community and Park Rx America. *(Note: Speaks to the preservation of parkland and the value of employers providing recreational amenities for employees – which can be achieved with on-site fitness/park areas and/or trail connections to nearby parks and recreation facilities.)*

**NATURAL AND CULTURAL RESOURCES POLICY 1: Continue to integrate natural and cultural resource stewardship needs at all levels of land use and programing related decision making.** *(Note: Speaks to the preservation of the environment and the importance that all new development should minimize impacts to natural and cultural resources.)*

**NCR 1.2** Prioritize identified sensitive ecological resources and corridors for acquisition and encourage the dedication of land to the County if owned by others. *(Note: See previous comments regarding Catharpin Greenway.)*

**TOURISM POLICY 4: Pursue new markets to increase visitation to existing sites and facilities in Prince William County, without adverse impacts to cultural resources.** *(Note: Through this policy the County should ensure that any future data center development is not a negative impact on visitation to parks adjacent to the proposed land area).*

**TOUR 4.4** Work with Federal, State, regional and local park partners to enhance tourism opportunities in the County by tapping into the significant resources of the Federal, State, and Regional parks located within the County (e.g., Manassas National Battlefield Park, Prince William Forest Park, Bull Run Mountains Natural Area Preserve, Merrimac Farm Wildlife Management Area, Potomac National Scenic Trail, and the National Museum of the Marine Corps). *(Note: Again, this speaks to the need to ensure that development around these parks does not decrease visitation and that bike/ped/equestrian trail connectivity is maintained and/or enhanced.)*

## **APPLICATION STRENGTHS AND WEAKNESSES**

### **Proposal's Strengths:**

- Regardless of the land use change, rezoning applications will continue to be required for development in this corridor, which in turn will continue to provide DPRT the opportunity to review and comment on parks and recreation needs and impacts in this area.
- The Environmental (E/R) designation area remains unchanged.

### **Proposal's Weaknesses:**

- The subject land area is more than double what was previously identified.
- Per the Proposed Long Range Land Use Map, the new Technology/Flex designation would be "limited to data centers", which implies the designation would be at the exclusion of other technology/flex uses. This would exclude land uses which could potentially have similar economic benefits with less environmental/open space impacts.
- The proposed development area abuts and covers the area between Conway Robinson State Forest and Manassas National Battlefield, thereby raising questions about compatible land uses, particularly with regard to buffers and viewsheds.
- This application has been filed prior to conclusion of the Data Center Opportunity Zone Overlay District Comprehensive Review, to which DPRT staff believes it is too soon to identify the full extent of land area best suited to serve this use – and again, potentially at the expense of other similar technological and/or economically viable uses.

## **DPRT FINDINGS**

After review, DPRT concludes that this proposal will not significantly impact the Department's ability to plan for and/or expand the County's park system, as long as rezoning applications will still be required and the Department is given the opportunity to work with individual applicants to pursue the continuation/expansion of the Catharpin Greenway, and any opportunities for new community parks in this corridor. That said, it is concerning to the Department that such a large land area is being considered for data center use prior to completion of the Data Center Opportunity Zone review, which is currently underway. The Department is also concerned with the implication on the Proposed Long Range Land Use Map included with the application that the subject area would be "limited to data centers", which could potentially exclude land uses which have similar economic benefits with lesser impacts on the environment and open space. Overall, DPRT would like to see more details about how the data centers in this corridor might be designed, and what site

constraints might be applied, to make these developments less visible on the significant park and recreation areas that already exist in this corridor.

If there are any questions regarding the above, please contact Patti Pakkala at [ppakkala@pwcgov.org](mailto:ppakkala@pwcgov.org). Email correspondence is preferred as I am currently working remotely a majority of the time.



## Plan Comments Report Planning Case Planner Reviewed w/Comments

<b>Plan/Case #:</b>	CPA2021-00004	<b>Date:</b> 12/10/2021
<b>Plan/Case Name:</b>	PW Digital Gateway	
<b>Plan Case Address:</b>	6385 PAGELAND LN GAINESVILLE VA 20155	
<b>Reviewer:</b>	Barrett, Bryce	
	703-792-8007	BBarrett@pwcgov.org

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 COMMENTS

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### Section II - Questions/General Information:

NO RECOMMENDATIONS DOCUMENTED.



December 10, 2021

**TO:** Michael Kitchen, PE  
Christopher Consultants  
9900 Main Street, Suite 400  
Fairfax, VA 22031

**FROM:** Bryce Barrett, Planning Office  
Phone Number: 703-792-8007, E-mail: BBarrett@pwcgov.org

**SUBJECT: Case Number:** Comprehensive Plan Amendment #CPA2021-00004  
**Case Name:** PW Digital Gateway

The 1<sup>st</sup> Submission has been reviewed with the following comments:

**I. Background** is as follows:

A. Request: This is a request for a Comprehensive Plan Amendment (CPA) to amend the Long-Range Land Use text and map classifications from AE, Agricultural or Estate, and ER, Environmental Resource, to T/F, Technology Flex, and ER, Environmental Resource to create a technology corridor along Pageland Lane for the development of data center uses. The request also proposes to remove the subject site from the Rural Area boundary.

The CPA request was initiated by the Board of County Supervisors on July 20, 2021, through Res. No. 21-445 to evaluate the entire corridor between Route 29 and Sudley Road. The Planning Office established five criteria for determining boundary of the ±2,132.7-acre study area:

1. Original PW Digital Gateway application
2. Board directed expansion to include US Route 29 through VA Route 234
3. Property owner expressed interest
4. Established communities
5. Existing cultural and environmental resources

B. Site Location: The subject ±2,132.7-acre site is located along Pageland Lane between Route 29 and Sudley Road; and is comprised of 197 parcels.

C. Comprehensive Plan: The subject site is designated as AE, Agricultural or Estate, and ER, Environmental Resource. The site is also located within the Rural Area boundary as defined by the Comprehensive Plan.

D. Zoning: The site is zoned A-1, Agricultural, and SR-5, Semi-rural Residential.

E. Surrounding Land Use: The site is adjacent to a mix of residential and agricultural uses to the west and north. To the east are residential and historic areas, specifically the Manassas National Battlefield Park. To the south is the Conway Robinson Forest Park and industrial uses south of Route 29 and in the Development Area of the County.

F. Data Center Opportunity Zone Overlay District (DCOZOD): The subject site is not located within the Data Center Opportunity Overlay District.

II. **Long Range Land Use Plan Analysis**: This site is located within the Rural Area of the County. The site is designated AE, Agricultural or Estate, and ER, Environmental Resource, on the Long-Range Land Use Map. The following table summarizes the uses and densities that are intended, based upon these designations:

Long Range Land Use Map Designation	Intended Uses and Densities
<b>Agricultural or Estate (AE)</b>  <b>Existing</b>	The purpose of the Agricultural or Estate classification is to protect existing agricultural lands, cultural resources, and open space, as well as other important rural environmental resources, and to provide areas within the County where large lot residential development is appropriate. The maximum density is one dwelling per 10 gross acres.
<b>Environmental Resource (ER)</b>  <b>Existing and Proposed</b>	This classification is explained in detail within the Environment Plan. Therein are located goals, policies, action strategies, and other Plan components designed to protect the sensitive nature of the identified resources. Environmental Resources include all 100-year floodplains as determined by the Federal Emergency Management Agency (FEMA), Flood Hazard Use Maps or natural 100-year floodplains as defined in the DCSM, and Resource Protection Areas (RPAs) as defined by the Chesapeake Bay Preservation Act. In addition, areas shown in an environmental constraints analysis submitted with a rezoning or special use permit application with wetlands; 25 percent or greater slopes; areas with 15 percent or greater slopes in conjunction with soils that have severe limitations; soils with a predominance of marine clays; public water supply sources; and critically erodible shorelines and stream banks are considered part of the Environmental Resource Designation.
<b>Technology/Flex (T/F)</b>  <b>Proposed</b>  <i>Applicant proposes to limit development for data centers only.</i>	Technology/Flex Industrial areas provide opportunities for production, flex office/warehouse space, and warehousing uses that do not require large outdoor storage or produce nuisances such as noise, dust, or vibration. They are less hazardous and limited impacts on surrounding areas compared to heavy manufacturing. Buildings in this area have medium to deep setbacks and larger block sizes. Surface parking is acceptable.  Primary Uses: <b>Data Centers</b> , Healthcare, Life Sciences, Federal government Contracting, Research and Development, Flex Space, Light Industrial, Warehousing & Logistics, Advanced Manufacturing Secondary Uses: Retail & Service Commercial, Office, Institutional, Public Facilities/Utilities

	Target non-residential FAR of up to .57 FAR Target Land Use Mix: Residential 0%, Non-Residential 100% Target Building Height: T-3: 3-5 Stories Minimum Open Space: 20% of the site Implementing Zoning Districts: PBD, O(F), M-2
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**III. Planning Office Recommendations:** Prior to providing planning office recommendations for the study area the Planning Office will host a community engagement meeting to solicit input from the general public. This meeting is currently being planned for the end of January/early February. More information will be published the project webpage at: <https://www.pwcva.gov/departments/planning-office/pw-digital-gateway>.

**IV.** The Following Comments are provided in review of the application for consistency with existing Comprehensive Plan Policies:

**Long Range Land Use Chapter:**

1. The intent outlined in the Land Use Chapter recognizes that growth and change will occur and that *smart growth principles help ensure open space and cultural resources are preserved, business are supported and expanded, the County's financial health is strengthened, and an exceptional quality of life is provided to County Residents*. The County uses the United States Environmental Protection Agency defined smart growth as a ranged of development and conservation strategies that help protect our natural environment and make our communities more attractive, economically stronger, and more socially diverse. The ten principles of smart growth, as adapted by the County, provide a sound basis by which the County can plan for its long-term future:

- Mix land uses in the Development Area.
- Take advantage of compact, environmentally friendly and energy efficient building design.
- Create a range of housing opportunities and choices.
- Create walkable neighborhoods.
- Foster distinctive, attractive communities with a strong sense of place.
- Preserve open space, farmland, cultural resources, natural beauty, and critical environmental areas.
- Strengthen and direct development towards existing communities and infrastructure.
- Provide a variety of transportation choices.
- Make development decisions predictable, fair, and cost-effective.
- Encourage community and stakeholder collaboration.

Provide justification on how the proposed change aligns with the ten strategies outlined above.

2. LU-POLICY 1 states: *Ensure adequate land uses necessary to provide a supply of land that allows the County to compete on a regional, national, and international basis for advanced*

*technological industries and other economic development opportunities that will bring new jobs to Prince William County residents, particularly new professional and other high-paying jobs.* Based on the justification provided in the application the proposal is generally in alignment with this strategy. Continued coordination with the Prince William County Economic Development Department to ensure the proposed land use changes are in alignment with the need for adequate land to support technology uses such as data centers.

3. LU2.6 states: *Ensure that the primary function of the Rural Area as reflected by the Long-Range Land Use Plan Map is to maintain open space, protect native habitats, allow for large-lot residential development, allow for agricultural activities, and provide potential sites for community facilities.* The Applicant has requested removal of the subject site from the Rural Area. The proposed change to T/F would result in areas previously planned for large-lot residential development and agricultural areas to be planned for industrial uses. As outlined above, other primary focus areas relate to open space, protecting native habitats, and providing potential sites for community facilities. Consideration should be given to how these areas could be preserved within the 2,132-acre study area.
4. LU-POLICY 3 states: *Plan and design all public facilities in a manner that generally conforms to the Comprehensive Plan, the Zoning Ordinance, the Design and Construction Standards Manual (DCSM), the Capital Improvements Plan (CIP), and the Strategic Plan and are integral to the developments inducing their needs.* Electric substations will be required to supply power from the transmission lines to potential data center development. Based on County Code substations are permitted in any zoning district outside the Data Center Opportunity Zone Overlay District (DCOZOD) through a Special Use Permit (SUP). As the study area is outside the DCOZOD, SUP applications will be required for future substation development.
5. LU-POLICY 11 states: *Encourage a land use pattern that supports the goals and objectives of the Cultural Resources Plan.* Additionally, LU11.1 states: *Encourage development densities at the low end of the range of the land use classifications near County Registered Historic Sites (CRHS), as reflected on the Long-Range Land Use Plan Map and in the Cultural Resources Plan.* Manassas National Battlefield Park is designated as a CRHS. Currently the proposal uniformly applies development across the study area. Consideration should be given to reducing development potential in the areas adjacent to the Park, as recommended by the Cultural Resources Plan.
6. LU11.2 states: *Evaluate rezoning and special use permit applications within and/or adjacent to CRHS-designated land to determine the appropriate density or intensity, layout, and height of new development.* Rezoning applications which occur adjacent to the Manassas National Battlefield Park will be evaluated as part of the criteria above. Consideration should be given to establishing criteria in the Policy recommendations provided to ensure transparent and uniform consideration for future rezoning applications.
7. LU-POLICY 12 states: *Encourage a land use pattern that respects environmental features in accordance with the goals and objectives of the Environment Plan.* LU12.1 also states: *Evaluate*

*the proposed development concept relative to the environmental constraints analysis submitted with rezoning and special use permit applications in accordance with EN-Policy 1 and EN-Policy 4 of the Environment Plan, to determine the appropriate density or intensity of development. Such development shall also be consistent with fire and rescue objectives.* Currently the proposal uniformly applies development across the study area. Consideration should be given to reducing development potential in the areas adjacent to significant environmental features. Additionally, consider expansion of the Environmental policy recommendations to incorporated protecting specific environmental features.

8. LU12.2 states: *Encourage development densities at the low end of the range of the land use classifications near areas identified as Environmental Resource (ER) and Parks and Open Space (POS) with sensitive features, as reflected on the Long-Range Land Use Plan Map.* Currently the proposal uniformly applies development across the study area. Consideration should be given to reducing development potential in the areas adjacent to sensitive features. This can be accomplished through the use of lower development potential, alternative land-use designations or transitional areas.
9. LU-POLICY 14 states: *Protect existing and planned land uses from the encroachment of incompatible land uses.* Incompatible uses are defined in the Land Use Compatibility Section of the Long-Range Land Use Plan. While T/F is not shown on the compatibility matrix generally AE is shown as incompatible with other industrial designations. It goes on to state: *land use classifications identified as "Incompatible" should only be located adjacent to each other when extensive and extraordinary mitigating measures can effectively address all compatibility concerns. Mitigation measures are of particular concern when inherently incompatible land uses such as residential uses and industrial uses are proposed adjacent to one another.* The application outlines general mitigation measures. Please provide more detailed information related to mitigation measures such as buffers widths, setbacks, screening and identify areas of emphasis for these measures. Additionally, transitional areas can also be used to mitigate two incompatible uses. Consider expansion of the policy recommendations to address mitigation.

## **Community Design Chapter**

1. DES-POLICY 1 states: *Encourage site, architectural, signage, and landscape designs that complement the scale and character of existing and planned development in the Development Area and in the Rural Area.* Following adoption of the CPA subsequent rezoning applications will be required for development of data centers within the study area. As development is likely to occur as separate applications considerations should be given to developing a design guidelines document for architecture, signage, and landscaping to ensure consistent and uniform development throughout the corridor and provide precedent images to help frame the vision for the corridor. The design guidelines should be incorporated and integrated with the existing policy recommendations included in the proposal.

2. DES-POLICY-12 states: *Fit new development into the natural landforms, particularly the existing woodland areas of the County.* Emphasis should be given to preservation of mature and healthy woodland areas in a coordinated manner that focuses on preserving existing environmental resources and creating open space connections for wildlife and native habitats. Consideration should be given to designating open space corridors. Additionally, as large portions of the study area were previously cleared for farming these areas should be identified for reforestation when identified as potential connections within these corridors and incorporated in the policy recommendations.

**V.** The following Comments are provided in review of the materials submitted:

1. On Page 1 of the Written Analysis Narrative and Suggested Plan Policies the application references "Non-development area." This is not an identified area within the Comprehensive Plan. The Comprehensive Plan designates Rural Areas and the Development Area.
2. On Page 1 of the Written Analysis Narrative and Suggested Plan Policies it references the BOCS Resolution as attached Exhibit A. This exhibit was not included in the application package.
3. On Page 1 of the Written Analysis Narrative and Suggested Plan Policies the application refers to data center facilities with ancillary offices. Please provide additional clarification as to what these uses are and how much of the proposed 27.6 million square feet could be developed with these uses. Typically, to be considered a secondary use it should not exceed 25% of the floor area of a development.
4. On Page 2 of the Written Analysis Narrative and Suggested Plan Policies the application states the overall FAR is designated as 0.30. Individual sites within the corridor may be rezoned at higher or lower FARs so long as the cumulative average within the corridor remains no more than 0.30. Consideration should be given to establish a maximum FAR for individual developments.
5. On Page 2 of the Written Analysis Narrative and Suggested Plan Policies the application it states the building height will be between 1-2 floors. However, on Page 3 it states a three-floor height limitation. Please clarify the language. Additionally, 1-2 floors for data centers can range greatly, please express the building height in feet in addition to floors.
6. In several places in the document Sudley Road is referred to as Old Sudley Road. For clarity refer to the name as shown on maps "Sudley Road."
7. On Page 4 of the Written Analysis Narrative and Suggested Plan Policies the application states this is a Small Area Plan. While the context and scale are similar the County has not

designated this as a Small Area Plan. Therefore, refer to the request as a Comprehensive Plan Amendment instead.

8. In several place in the document there are references to existing utility infrastructure including within or near the study area. These include transmission lines (which are shown in several of the exhibits), fiber optics, telecommunications, and natural gas, water and sewer lines. An additional exhibit showing all of the existing utility infrastructure would help provide clarity on the infrastructure present.
9. On Page 5 of the Written Analysis Narrative and Suggested Plan Policies the application includes a linked flyer. All exhibits should be submitted in the application package.
10. On Page 10 of the Written Analysis Narrative and Suggested Plan Policies the application references an analysis of the 2017-2020 Strategic Plan. However, the Board adopted the 2021-2024 Strategic Plan on July 20, 2021. Revise the analysis based on the most recently adopted plan.
11. On the PW Digital Gateway – Environmental Resources Narrative of the application it states the area consists of 592 parcels. The study area as provided in County GIS is approximately 197 parcels.
12. The Boundary provided in the exhibits appears to include GPIN: 7498-37-3622. This parcel is not included in the expanded study area boundary and should be removed.

If you have any further questions, please feel free to contact me.



## Plan Comments Report Planning GIS Specialist Review Completed

<b>Plan/Case #:</b>	CPA2021-00004	<b>Date:</b> 12/03/2021
<b>Plan/Case Name:</b>	PW Digital Gateway	
<b>Plan Case Address:</b>	6385 PAGELAND LN GAINESVILLE VA 20155	
<b>Reviewer:</b>	Mccleary, John	
	703-792-6859	JMcCleary@pwcgov.org

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:

NO COMMENTS

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### Section II - Questions/General Information:

NO RECOMMENDATIONS DOCUMENTED.



## Plan Comments Report Service Authority (PLN) Reviewed w/Comments

<b>Plan/Case #:</b>	CPA2021-00004	<b>Date:</b> 12/10/2021
<b>Plan/Case Name:</b>	PW Digital Gateway	
<b>Plan Case Address:</b>	6385 PAGELAND LN GAINESVILLE VA 20155	
<b>Reviewer:</b>	Barrett, Bryce	
	703-792-8007	BBarrett@pwcgov.org

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 COMMENTS

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### Section II - Questions/General Information:

NO RECOMMENDATIONS DOCUMENTED.

December 9, 2021

**MEMORANDUM**

To: Bryce Barrett  
PWC Office of Planning

From: David L. Guerra, P.E.

Re: **CPA2021-00004, PW Digital Gateway**

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The Service Authority's comments regarding this proposed Comprehensive Plan Amendment are as follows:

- The Service Authority has sufficient water treatment capacity to meet projected demands under the current Comprehensive Plan through 2045. Additionally, the Service Authority has confirmed that additional water treatment capacity can be obtained in sufficient quantity to meet development requirements under the CPA based on demand projections by the Service Authority. Additional water capacity would be planned for purchase or development without subsidy by or financial impact to existing customers.
- For wastewater treatment, expansion of treatment capacity at the Upper Occoquan Service Authority (UOSA) Plant is planned in three increments to meet projected flows beyond 2045 under the current Comprehensive Plan. There is the ability to expand UOSA further if needed to meet development requirements under the CPA based on flows projected by the Service Authority. Additional wastewater treatment capacity would be planned for purchase and development without subsidy by or financial impact to existing customers.
- The absence of water and sewer infrastructure in any given part of the Rural Area should not be considered an impediment to development with the "growth pays for growth" policies, as the infrastructure extensions would be designed and constructed by applicants to serve their development. The Service Authority is developing a master plan based on the current Comprehensive Plan and Land Use Policies. A change in density and land use policy would require additional planning studies to determine the optimal water and sewer transmission systems to serve the

proposed development. Properly sizing and extension of existing infrastructure would be planned for development without subsidy by or financial impact to existing customers.

- In accordance with the Service Authority's Development Review Process and System Improvement Policy, which is consistent with the County's Comprehensive Plan and aligned with the growth pays for growth policy, the applicant is responsible for the design and construction of the infrastructure necessary to serve their development. All proposed development projects are reviewed by the Service Authority to determine if the existing water distribution, sewer collection systems, and pump stations are adequate to meet the projected water demands and wastewater flows. Deficiencies will be identified, and the applicant will be notified of their requirements to meet the Service Authority's established performance standards for service.
- Regarding Section III. Land Use – Data Centers are suited for the Corridor (Bullet No. 3) shown on Page 8 of 20 of the Written Analysis Narrative: Planned upgrades to the Heritage Hunt Sewage Pumping Station and its infrastructure are to accommodate the build-out of the Little Bull Run sewer shed in accordance with the current Comprehensive Plan and land use policies (sewer flows from the properties/areas covered by the CPA are not accounted for or accommodated by the new Heritage Hunt Sewage Pumping Station and its infrastructure). The Service Authority cannot comment on the statement in this Bullet No. 3 that "Water and sewer lines will not leapfrog across Rural Area designated land because the Corridor abuts the Development Area", as the layout and alignment of infrastructure extensions has not been set at this time.



## Plan Comments Report Transportation Dept Reviewed w/Comments

<b>Plan/Case #:</b>	CPA2021-00004	<b>Date:</b> 12/01/2021
<b>Plan/Case Name:</b>	PW Digital Gateway	
<b>Plan Case Address:</b>	6385 PAGELAND LN GAINESVILLE VA 20155	
<b>Reviewer:</b>	Scullin, Elizabeth	
	703-792-4051	escullin@pwcgov.org

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:

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### Section II - Questions/General Information:

Comments are attached to the case in a Comment Table. The Applicant must reply to the comments directly into the table and provide a Word document for the reviewer's use. The Correction and Recommendation features are no longer used for PWCDOT review.

 <p><b>PRINCE WILLIAM COUNTY DEPARTMENT OF TRANSPORTATION PROJECT REVIEW COMMENT AND RESOLUTION SHEET</b></p>		<p>TIA NOT REQUIRED</p>	<p><b>COMMENT CATEGORIES:</b> 1. CORRECTIONS 2. RECOMMENDATIONS</p>		
<p>COUNTY PROJECT NUMBER: CPA2021-00004</p>		<p>DEVELOPER/ENGINEER: CHRISTOPHER CONSULTANTS/ GOROVE/SLADE</p>	<p>REVIEWER(S): ELIZABETH SCULLIN, <a href="mailto:ESCULLIN@PWCGOV.ORG">ESCULLIN@PWCGOV.ORG</a>, (703) 792-4051</p>	<p>DATE: 12/01/2021</p>	
<p>TYPE &amp; SUBMITTAL: 1<sup>ST</sup> SUBMISSION</p>		<p>PROJECT NAME: PW DIGITAL GATEWAY</p>			
ITEM NO.	REFERENCE	COMMENTS	COMMENT CATEGORY	RESPONSE <sup>(1)</sup> DATE:	FINAL DISPOSITION <sup>(2)</sup>
1.01	Trip Gen. Memo (10-20-21)	The memo compares the trip generation of the currently allowed uses (A-1) on the 2,133 acre corridor with 196 residences to the proposed development program for 27,612,684 sf of data centers. However, the memo also presents the trip generation for “allowable subdivided development” which considers family subdivisions of 1 acre lots, yielding 750 “by-right” residences. The County disagrees with this as not all individual land owners could subdivide their property into 1 acre lots given that the Subdivision Ordinance only allows family subdivisions for immediate family members, and that cannot be assumed in this case as a base number for trip generation.			

<p>(1) To be filled out by Applicant/Engineer. Date of Response is required. (2) The PWC reviewer is responsible for the final disposition of all comments.</p>	<p>Note: This form is to be used by the PWC Transportation Planning to provide comments or concerns associated with the rezoning applications, site plans, special use permit applications or any other plans when requested by the applicants. REVISED: MAY, 2017</p>
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 <p><b>PRINCE WILLIAM COUNTY DEPARTMENT OF TRANSPORTATION PROJECT REVIEW COMMENT AND RESOLUTION SHEET</b></p>		<p>TIA (NOT REQUIRED)</p>	<p><b>COMMENT CATEGORIES:</b> 1. CORRECTIONS 2. RECOMMENDATIONS</p>		
<p>COUNTY PROJECT NUMBER: CPA2021-00004</p>		<p>DEVELOPER/ENGINEER: CHRISTOPHER CONSULTANTS/ GOROVE/SLADE</p>	<p>REVIEWER(S): ELIZABETH SCULLIN, <a href="mailto:ESCULLIN@PWCGOV.ORG">ESCULLIN@PWCGOV.ORG</a>, (703) 792-4051</p>	<p>DATE: 12/01/2021</p>	
<p>TYPE &amp; SUBMITTAL: 1<sup>ST</sup> SUBMISSION</p>		<p>PROJECT NAME: PW DIGITAL GATEWAY</p>			
ITEM NO.	REFERENCE	COMMENTS	COMMENT CATEGORY	RESPONSE <sup>(1)</sup> DATE:	FINAL DISPOSITION <sup>(2)</sup>
1.02	Trip Gen Memo	Table 3 shows the comparison of trips generated assuming a 0.3 FAR for the 2,133 acres to the trips generated by the existing Land Use and “Allowable” Land Use. The reference to “Allowable” Land Use must be removed. The comparison indicates that 25,406 additional daily trips will be generated by the proposed data centers over the number of trips generated by the existing land use.			
1.03	Trip Gen Memo	The County supports the CUBE Travel Demand Model analysis as outlined in the VDOT Scoping Document.			

<p>(1) To be filled out by Applicant/Engineer. Date of Response is required. (2) The PWC reviewer is responsible for the final disposition of all comments.</p>	<p>Note: This form is to be used by the PWC Transportation Planning to provide comments or concerns associated with the rezoning applications, site plans, special use permit applications or any other plans when requested by the applicants. REVISED: MAY, 2017</p>
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## Plan Comments Report VA Environmental Quality Comments Not Received

<b>Plan/Case #:</b>	CPA2021-00004	<b>Date:</b> 12/14/2021
<b>Plan/Case Name:</b>	PW Digital Gateway	
<b>Plan Case Address:</b>	6385 PAGELAND LN GAINESVILLE VA 20155	
<b>Reviewer:</b>	Barrett, Bryce	
	703-792-8007	BBarrett@pwcgov.org

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:

NO COMMENTS RECEIVED AT THIS TIME

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### Section II - Questions/General Information:

NO RECOMMENDATIONS DOCUMENTED.



# Plan Comments Report

## VDOT Fairfax

### Comments Not Received

<b>Plan/Case #:</b>	CPA2021-00004	<b>Date:</b>	
<b>Plan/Case Name:</b>	PW Digital Gateway		
<b>Plan Case Address:</b>	6385 PAGELAND LN GAINESVILLE VA 20155		
<b>Reviewer:</b>	Scullin, Elizabeth		
	703-792-4051	escullin@pwcgov.org	

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:**

To date a complete application has not been received by VDOT, and therefore no comments have been submitted to the County and applicant.

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#### **Section II - Questions/General Information:**

NO RECOMMENDATIONS DOCUMENTED.



## Plan Comments Report Watershed Management Reviewed w/Comments

<b>Plan/Case #:</b>	CPA2021-00004	<b>Date:</b> 12/09/2021
<b>Plan/Case Name:</b>	PW Digital Gateway	
<b>Plan Case Address:</b>	6385 PAGELAND LN GAINESVILLE VA 20155	
<b>Reviewer:</b>	Flanagan, Julia	
	703-792-7208	jflanagan@pwcgov.org

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 COMMENTS

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### Section II - Questions/General Information:

NO RECOMMENDATIONS DOCUMENTED.

# WATERSHED MANAGEMENT COMMENTS

**PROJECT:** PW Digital Gateway

**PROJECT#:** CPA2021-00004

**FROM:** Benjamin Eib, Assistant Chief of Watershed Management Branch

**REVIEWERS:** Julia Flanagan (Arborist), Clay Morris (Environmental Engineer)

**DATE:** December 10, 2021 (1<sup>st</sup> submission)

**REQUEST:** CPA to create a Digital Corridor

## **COMMENTS:**

### **I. Anticipated Impacts on Goals, Policies and Action Strategies of the Comprehensive Plan Natural Resources**

1.1 The entirety of the 2,132 acre CPA proposed is currently planned to remain in the Rural Area and Environmental Resource (AE & ER) The proposed Tech Flex (T/F) Long Range Land Use classification would allow a dramatic change to the land use with associate far-reaching impact to natural resources.

Major impacts would include loss of extensive tracts of forest land, dramatic increases in impervious area, impact to numerous intermittent and perennial streams, steep slopes with highly erodible soils, wildlife habitat (including habitat for rare, threatened and endangered species) and potential impacts to wetlands.

Numerous Comprehensive Plan Policies and Action Strategies speak to protecting and preserving these valuable natural resources (See DES-12.1, 12.2, 12.3 and 12.5; EN-1.3 and 1.7; EN-4.8; EN-5.1, 5.3, 5.17, 5.19; EN-6.10; EN-9.10; EN-10; DES-9.4; EN-3.7 and 3.13) Thus far development of data centers has resulted in mass grading that does not preserve forests, steep slopes or other sensitive features, resulting in little preservation of natural resources outside of areas protected by state or federal law.

Therefore, staff recommends the Comprehensive Plan remain unchanged.

1.2 Impacts to the Little Bull Run RPA would be affected by the proposed widening of Pageland Lane to 4 lanes associated with the data center development.

1.3 The proposed data centers would also allow encroachments into the RPAs for utilities, as such uses are considered either exempt or permitted within the RPA.

1.4 On the “Environmental Conditions Map” (Sheet 7) show (ZO 32-700.21.6; EN-1.2, Reference Manual):

- a. Soils overlay
- b. Steep slopes of 15% and slopes of 25% and greater
- c. Show the outline of all land qualifying as ER, as ER is defined in the Comprehensive Plan, Long Range Land Use Plan (See Page LU-31).

- d. Use a larger, readable scale. Perhaps nothing smaller than 1:400. We do not need to see all of the battlefield property.

1.5 With regard to Community Design, the proposed land use change would bring about extensive and incompatible changes both within the proposed CPA and with all abutting land uses. The development of existing data centers has demonstrated that extensive mass grading and the nearly wholesale clearing and flattening of large parcels is the norm. Replacement of forests and fields with numerous buildings, each the size of several football fields, will greatly alter the community appearance. In order to lessen these visual and environmentally detrimental effects, staff would recommend implementation of major preservation, buffering and site design strategies should this change take place.

Staff recommends any change to the Comp. Plan Land use designations be accompanied by such measures as the following:

- a. Make the highest priority the establishment of substantial protected open space (Natural Open Space and Environmental Resource Corridors) around wetlands; extending along perennial and intermittent streams along with adjacent bluffs and steep slopes with highly erodible soils; and for rare, threatened and endangered species.
- b. Restoration of natural resources and habitats such as native forest and meadows for inclusion in protected Natural Open Space, where such resources have previously been removed. (DES-13)
- c. Perimeter buffering of existing natural and historical resources beyond what current standards require. For example, a minimum 200' wide buffer of preserved forest where it exists with supplemental planting as needed along the borders with the Manassas National Battlefield Park, Conway Robinson State Forest, and other lands protect for cultural resources.
- d. Buffering of roadways beyond the current standards with a minimum of 200' buffer. This should include prioritizing preservation of forests and native meadows where they exist and restoration of these land features where they do not. (DES-4)
- e. Higher mitigation standards for impacts to wetlands and RPAs.
- f. Improvement of degraded streams by the rezoning applicants (EN-7.2)

## **II. Site Specific Concerns:**

None at this time.

## **III. Conflicts with Minimum Development Standards:**

N/A