

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.

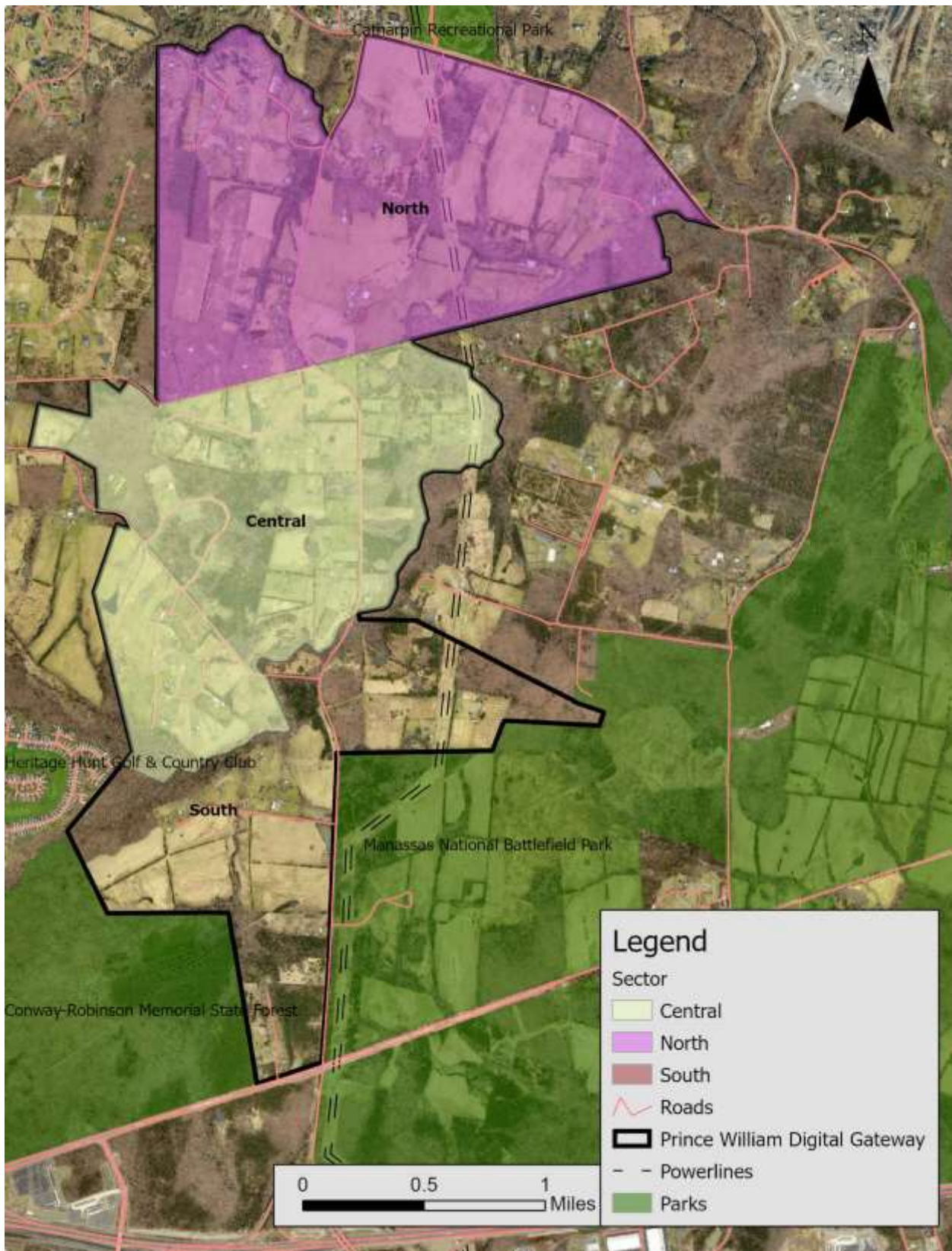


Figure 1. Project Area and Cultural Resource Analysis Sectors

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.

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.

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.

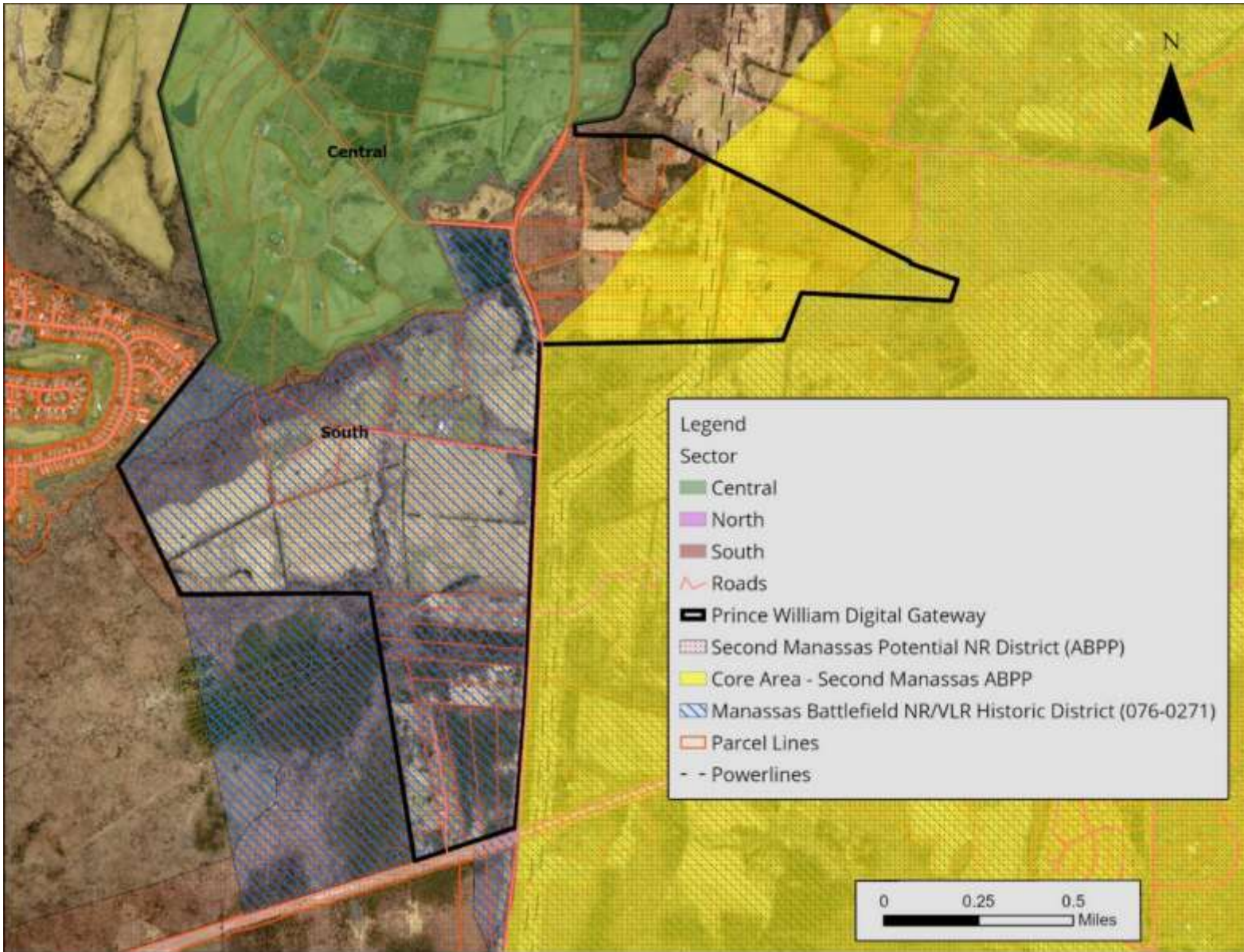


Figure 2. South Sector of Project Area

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