

**American Battlefield Trust • Piedmont Environmental Council
National Parks Conservation Association • Preservation Virginia
Southern Environmental Law Center • Coalition for Smarter Growth
Great Falls Group of the Sierra Club • Journey Through Hallowed Ground
Prince William Conservation Alliance • Virginia League of Conservation Voters
Virginia Native Plant Society • Prince William Wildflower Society
National Trust for Historic Preservation • Faith Alliance for Climate Solutions**

October 18, 2022

Prince William County Board of Supervisors
1 County Complex Court
Woodbridge, VA 22192

VIA EMAIL

**Re: Public Discussion and Clarification of Planning Commission Recommendations on
Proposed Digital Gateway Comprehensive Plan Amendment**

Dear Chair Wheeler and Members of the Prince William County Board of Supervisors:

In light of the perplexing and unprecedented circumstances surrounding the Planning Commission's public hearing and vote on the proposed Digital Gateway Comprehensive Plan Amendment ("CPA") last month, County residents and stakeholders were encouraged to see Chair Wheeler quoted in a recent Prince William Times article as acknowledging that the County needs "to take a step back and clarify" the many questions and the deep confusion that the Planning Commission's action has generated.¹

As you are aware, the Planning Commission's September 14 public hearing on the CPA ran through the entire night, with the Commission finally voting around 5:00 a.m. the next day. With all due respect to the members of the Planning Commission, the perils of making decisions under such circumstances were on full display during those early morning hours. Most troubling is the fact that the motion the Commission adopted recommending approval of the draft CPA included three major "additional recommendations" that were never explained or discussed further.² The last-minute inclusion of these additional recommendations has left the public thoroughly confused about what changes to the draft CPA the Planning Commission intended to recommend, and it is difficult to see how County staff could prepare and present to the Board a

¹ Jill Palermo, *County board will delay Prince William Digital Gateway vote 'to clear up confusion' about the process* (Prince William Times, Sept. 22, 2022), https://www.princewilliamtimes.com/news/breaking-county-board-will-delay-prince-william-digital-gateway-vote-to-clear-up-confusion-about/article_bc9acf60-3aa9-11ed-bfb8-2bb0ad0ca6a7.html.

² Commissioner Brown's motion, adopted by the Commission on a 4-3-1 vote, reads as follows: "I move that the Prince William County Planning Commission adopt the findings set forth in the draft resolution contained in the staff report and recommend to the Board of County Supervisors the adoption of the Comprehensive Plan Amendment 2021-00004, the Prince William Digital Gateway, **with the following additional recommendations: (1) noise is adequately reduced and/or mitigated; and (2) proper measures are taken to address any potential negative environmental issues; and (3) planning staff include the revisions and clarifications requested by the applicants in Exhibit A attached to the letter to the Planning Commission dated September 9, 2022.**" (Emphasis added.)

draft CPA that properly incorporates the Commission’s input without further guidance from that body.

More specifically, the first two of the “additional recommendations” in the Commission’s motion were extremely vague, making it impossible for the public—and presumably staff as well—to determine the types of additional mitigation measures the Commission felt were needed to address its concerns regarding adverse noise and environmental impacts. But even more troubling is the third of the motion’s “additional recommendations,” which purported to incorporate various changes to the draft CPA that had been proposed in an exhibit attached to a September 9, 2022 letter that the data center companies who are seeking to develop the lands at issue had sent to the Planning Commission.

We find it unacceptable that the data centers’ letter was not made available to the public prior to the public hearing, and that there was no presentation or discussion of the data centers’ proposed changes or of staff’s assessment of them.³ This total lack of discussion or even public knowledge of the data centers’ proposed changes is obviously a major source of the confusion and frustration that has erupted among the public around the Commission’s action. That frustration has only intensified now that the public has become aware of the magnitude of the changes the data centers proposed and the extent to which they would undermine key protections included in the draft CPA.

For the County to truly take a step back and make a meaningful attempt to address the public’s confusion and frustration surrounding the Planning Commission’s action, we believe the Board must send the proposal back to the Planning Commission with direction that County staff present the data centers’ proposed changes—and staff’s assessment of them—to the Commission for open discussion in a public meeting. The meeting must also provide an opportunity for the Commission to provide much-needed clarification regarding the changes it is recommending to the draft CPA before the Board reviews it.

We noticed that an October 11, 2022 memo from staff to the Board was recently posted on the County’s webpage for the Digital Gateway CPA, and we feel compelled to say that if this memo is intended to be the clarifying “step back” to which Chair Wheeler referred, we find it completely inadequate. It contains no discussion of the Planning Commission’s “additional recommendations” or the data centers’ proposed changes, and it fails to explain how staff might be attempting to address them. Just as troubling, it indicates that despite the unresolved confusion surrounding the Planning Commission’s action, the Board now has its own public hearing on the draft CPA scheduled for November 1.

For the benefit of County residents and stakeholders—both in terms of their understanding of the draft CPA and their faith in the County’s public review processes—we strongly urge the Board to send the proposal back to the Planning Commission for a public meeting to discuss the changes the data centers have proposed, and to clarify the “additional

³ Jill Palermo, *Data centers’ last-minute letter seeks to weaken county policies for PW Digital Gateway*, Prince William Times (Sep. 21, 2022), https://www.princewilliamtimes.com/news/data-centers-last-minute-letter-seeks-to-weaken-county-policies-for-pw-digital-gateway/article_003ec9e4-39f9-11ed-9f25-c7ffa1badaba.html.

recommendations” that the Commission included in its motion. Notably, we believe this clarifying step would also be of tremendous value to the Board as you prepare to evaluate such a controversial and impactful proposal, and to determine whether it is consistent with your vision for the County’s future.

Sincerely,

Jim Campi

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Andrea McGimsey

Executive Director
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cc: Members of the Prince William County Planning Commission
(Chair Cynthia Moses-Nedd, Vice-Chair Juan McPhail, Joseph Fontanella, Jr.,
Patty Kuntz, Tom Gordy, Richard Berry, Qwendolyn N. Brown)
The Honorable Tim Kaine
The Honorable Mark Warner
The Honorable Jennifer Wexton
The Honorable Gerry Connolly
The Honorable Abigail Spanberger
Ms. Raquel Montez, Superintendent (Acting), Manassas National Battlefield Park