



United States Department of the Interior
NATIONAL PARK SERVICE



Manassas National Battlefield Park
12521 Lee Highway
Manassas, VA 20109

May 2, 2022

Mr. Bryce Barrett
Planning Office
County of Prince William
5 County Complex Court
Prince William, VA 22192

Subject: NPS Comments on CPA2021-00004, PW Digital Gateway

Dear Mr. Barrett:

On April 21, 2022, the National Park Service (NPS) received the third submission of 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 as well as 570 acres that have been formally designated by federal and state agencies as significant to the Second Battle of Manassas. Manassas National Battlefield Park (MNBP) continues to oppose this CPA because of its high potential to have adverse effects on both the historic and natural resources of the park and the surrounding lands.

The third submission describes the status of the cultural resources within the CPA area and within the park. The corridor for the PW Digital Gateway is not just adjacent to but *within* a National Register district. That district contains historic resources that are not addressed within the CPA submission. The Pageland II house (c.1865) structure was omitted from the submission. The protections afforded to the noted structure, Honeywood (c.1830), in the third submission are inadequate and the MNBP requests more robust considerations and protections for this site. The full breadth of the National Register listed historic resources contained within the CPA area need to be recognized and given the utmost protection. They are amongst the most at-risk resources to be adversely affected by potential development.

Viewshed protection is a critical component of the preservation of the park's historic integrity and a vital part of the visitor experience. The area proposed for berming is on the park's northern border and is separated in many locations by nothing more than a board fence. Despite screening any proposed buildings, the berm itself would become a viewshed impact. The creation of large man-made berms atop American Battlefield Protection Program (ABPP) designated Core Areas also negatively impacts not only the viewshed but the historic topographic integrity of the cultural landscape.

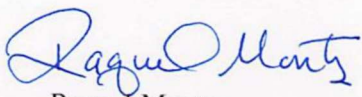
The Park requests that areas where berming is proposed, along the northern side of the Brawner Farm and east of the powerline corridor, be excluded from any development. The area is ABPP Core battlefield land with significant continuity and connections to the MNBP lands. The area should be set aside in the CPA as a protected open space.

The area within the CPA as well as adjacent lands are continually characterized as having lost their rural integrity and the historic significance marginalized. Within the MNBP, the Brawner farm area is described only as a marred landscape. In reality, it is an exceptionally well-preserved historic cultural

landscape with one of the greatest grasslands and shrublands environments in the area which has become a vanishing resource. Likewise, the lands within the CPA area retain a high degree of integrity as both cultural and natural landscapes. It is important to recognize these features and characteristics in order to determine appropriate uses and plan around their protection.

The National Register of Historic Places is designed to contribute to the understanding of the historical and cultural foundations of the Nation. The destruction of any of those places would be a step backwards for the community and the country. The CPA would open the door to that loss and the park urges serious consideration be given to the concerns expressed in this letter and in previous responses. Park management continues to hope for an equitable solution that meets the goals of all parties while joining the MNBP as stewards of these resources.

Sincerely,



Raquel Montez
Superintendent (Acting)