Northern Virginia State Senators Northern Virginia State Delegates Fairfax County Board of Supervisors Transmitted By Email

September 20, 2022

Dear Northern Virginia State and Local Elected Officials,

As many of you know, the proposed Prince William Digital Gateway (PWDG) is a Comprehensive Plan Amendment (CPA) in Prince William County to designate over 2,100 acres for data center development in a currently rural area, directly adjacent to Manassas National Battlefield Park (Battlefield) and Conway Robinson State Forest. We are writing to alert you that it appears that Prince William County is moving quickly to approve this massive and irreversible proposal despite significant opposition and many unanswered questions. The County's Planning Commission voted to recommend approval at its September 14<sup>th</sup> meeting, and the CPA is now on a fast track for approval by county officials. Following the Planning Commission vote, all signs point to a rapid approval by the Prince William Board of County Supervisors (BOSC) as early as mid-October. This proposal is opposed by more than 30 environmental and historic preservation nonprofits, hundreds of community members, the National Park Service and Virginia Department of Forestry<sup>1</sup>, and dozens of regional Homeowner Associations.

While this might appear at first glance to be primarily a local issue, it differs from other land use decisions in its proximity to a national park and state forest, and that it risks inflicting significant and negative impacts on those resources, damaging the region's drinking water supply and accelerating the rise of carbon emissions in Prince William County, undermining state and regional targets.

As concerned environmental, national park, smart growth, natural resource and conservation and historic preservation organizations, we are extremely concerned that allowing a huge complex of data centers and industrial development just a stone's throw from the Battlefield will irreparably harm the visitor experience to the park and undermine the decades of collaborative efforts that have gone into protecting this nationally important historic resource. In addition, the proposal implicates road widening and road connections that reflect a key segment of the age-old outer beltway proposal (Bi-County Parkway). It would also have severe visual and noise impacts and huge additions of impervious surfaces necessary to accommodate an additional 27 million square feet of data centers. Further, such action will distinguish Prince William County as the jurisdiction which is reversing its commitment to maintaining a protective down planned area in its Rural Crescent.

Perhaps most important to the Northern Virginia region is the fact that Prince William County houses the largest portion of the land within the Occoquan Watershed (40 percent) with over one-third of that forested land. For residents in Eastern Prince William, the City of Alexandria, Fort Belvoir and parts of Fairfax County, the Occoquan Reservoir is the primary source of drinking water.

Fairfax Water, which treats drinking water for over 2 million residents and in Northern Virginia, has expressed serious concerns with the PWDG and requested that "Prince William County"

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<sup>&</sup>lt;sup>1</sup> December 23, 2021 Letter from Commonwealth of Virginia Department of Forestry Forestland Conservation Coordinator Sarah Parmelee to Board of County Supervisors Chair Ann Wheeler.

request that the Occoquan Basin Policy Board convene and oversee a Comprehensive Study of the proposed Planning initiatives - the Comprehensive Plan Update, Digital Gateway Corridor, and the Data Center Opportunity Overlay District - to evaluate their impact on water quality in the Occoquan Reservoir." Fairfax Water has asked the county "to embrace a holistic and comprehensive approach" using its Watershed Model "as an essential input to the land use decision process." The Board of County Supervisors recently agreed to a study, but the findings of that study will not inform their decisions, since results will be available long after the Digital Gateway CPA will come to the BOCS for a vote.

Our groups and local residents have consistently weighed in on this proposal and there is no indication that decision-makers are listening to the levels of concern expressed. The draft CPA language prepared by county staff and approved by the Planning Commission is woefully inadequate to protect against impacts to the Battlefield and Conway Robinson.

The Commonwealth of Virginia subsidizes the data center industry without knowing the true costs to the Virginia taxpayer.<sup>3</sup> Between FY 2010-17, state tax exemptions for data centers cost taxpayers \$417.47 million. That figure could be well over \$1 Billion by now. While localities are wooed by local tax revenue, we know two things: revenue diminishes over time and it does not cover the long-term tangible and intangible environmental costs.

- Who will pay to address a degradation in water quality?
- Who will be responsible for the rise in carbon emissions and who pays to mitigate increases in carbon emissions?
- To what extent will ratepayers incur increases in electricity bills to pay for new data center infrastructure?

The broad array of organizations listed below reflects the high level of concern with this proposal. We ask that you add your voices and work with the Board of County Supervisors to guide this type of proposal to a more suitable location in the County, such as the existing Prince William Data Center Overlay District.

Local and State leaders will increasingly be confronted by these questions. We have the opportunity to make changes now before irreversible land use decisions are made.

As always, members of our groups, including those signed below, are happy to discuss this further with you and your staff and provide any additional information or answer your questions. Please contact Ann Bennett at <a href="mailto:ann.bennettrtw@gmail.com">ann.bennettrtw@gmail.com</a> regarding this matter.

Thank you for your service to our community and for your response to this letter.

Sincerely,

Kate West, Director Sierra Club Virginia Chapter Kyle Hart, Mid-Atlantic Program Manager National Parks and Conservation Association

<sup>&</sup>lt;sup>2</sup> Letter from Fairfax Water to Rebecca Horner, Prince William Deputy County Executive, March 21, 2022.

<sup>&</sup>lt;sup>3</sup> http://jlarc.virginia.gov/pdfs/reports/Rpt518-1.pdf

Pat Calvert, Sr Policy + Campaign Manager Elizabeth Merritt, Deputy General Counsel **Virginia Conservation Network** National Trust for Historic Preservation Joseph Eaves, Chair Glenda Booth, President Manassas Battlefield Trust The Friends of Dyke Marsh Elizabeth Kostelny, Chief Executive Officer Mark Perreault, President **Preservation Virginia** Citizens for a Fort Monroe National Park Kim Hosen, Executive Director Claudia Thompson-Deahl, Conservation **Prince William Conservation Alliance** Chair **Prince William Wildflower Society** Stewart Schwartz, Executive Director **Coalition for Smarter Growth** Elizabeth Lyons, President Audubon Society of Northern Virginia Julie Bolthouse. Director of Land Use **Piedmont Environmental Council** Jim Campi, Chief Policy and Communications Officer American Battlefield Trust Nancy Vehrs, President **Virginia Native Plant Society** David Sligh, Conservation Director Anne Little, Executive Director Wild Virginia **Tree Fredericksburg** William W. Sellers. President/CEO Robin Broder, Deputy Director Journey Through Hallowed Ground Waterkeepers Chesapeake **National Heritage Area** Skip Stiles, Executive Director Alexander M. Nance, Executive Director **Wetlands Watch** Virginia Piedmont Heritage Area Eric Goplerud, Chair Nancy Stoner, President **Faith Alliance for Climate Solutions** Potomac Riverkeeper Network Michael Murray, Chair Hope Cupit, Executive Director **Southeastern Rural Community Coalition to Protect America's National Parks Assistance Project** Reed Perry, Manager of External Affairs Lee Francis, Deputy Director **Virginia League of Conservation Voters Chesapeake Conservancy** John Clewett, Co-Lead Renee Grebe, Northern Virginia **Conservation Advocate** Lewinsville Faith in Action

**Audubon Naturalist Society** 

David V. Brotman, Executive Director Friends of the North Fork of the Shenandoah River

Leighton Powell, Executive Director Scenic Virginia

Frank Washington, Director

**Coalition To Save Historic Thoroughfare** 

cc: Jamie Bain Hedges, P.E. General Manager, Fairfax Water Robert Lazaro, Executive Director, Northern Virginia Regional Commission

## Addressees:

Senator Jeremy McPike Senator Scott Surovell Senator George Barker Senator John Bell Senator Richard Stuart Senator Dave Marsden Senator Chap Petersen Senator Adam Ebbin Senator Jennifer Boysko Senator Janet Howell Senator Richard Saslaw Senator Barbara Favola Chairman Jeff McKay
Supervisor Dan Storck
Supervisor Rodney Lusk
Supervisor Penny Gross
Supervisor Patrick Herrity
Supervisor Kathy Smith
Supervisor Dalia Palchik
Supervisor James Walkinshaw
Supervisor John Foust
Supervisor Walter Alcorn

Delegate Candi King Delegate Danica Roem Delegate Dan Helmer Delegate Luke Torian

Delegate Elizabeth Guzman Delegate Michelle Maldonado

Delegate Briana Sewell

Delegate Suhas Subramanyam

Delegate David Bulova Delegate Vivian Watts Delegate Eileen Filler-Corn Delegate Kathy Tran

Delegate Mark Sickles

Delegate Charniele Herring

Delegate Paul Krizek

Delegate Elizabeth Bennett-Parker

Delegate Karrie Delaney Delegate Kaye Kory Delegate Alfonzo Lopez

Delegate Marcus Simon

Delegate Rip Sullivan

Delegate Kathleen Murphy

Delegate Ken Plum Delegate Irene Shin