

STAFFORD COUNTY, VIRGINIA
IMPACT STATEMENT

Owner: Augustine South Associates LLC, Jefferson-Marumscos 2, LLC, & South Accokeek Creek, LLC (collectively, the “Owner”)

Applicant: Garrett Development Corporation d/b/a The Garrett Companies (Stafford CO) (the “Applicant”)

Applicant’s Representative: Charles W. Payne, Jr.
Hirschler
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Project Name: “GWV- Data Center”

Property: Stafford County Tax Map Parcels 28-87, 29-32, 29-36, 29-39C, 29-81, 29-82, 29-83, 37-63, 38-1, 38-1A, 38-3, 38-4, 38-4C, 38-55, 38-66, 38-67, 38-68A, 38-70, 38-71, 38-77A, collectively consisting of approximately 1,041.68907 acres of land, as depicted on that certain generalized development plan titled “Generalized Development Plan GWV-Data Center Zoning Re-Classification & Conditional Use Permit”, prepared by Bowman, dated June 2024, as last revised October 3, 2024 (the “GDP”)

Date: October 15, 2024

Current Zoning: Urban Commercial, B-2; Urban Residential – High Density, R-3; Light Industrial, M-1; Rural Residential, A-2; and Agricultural, A-1

Rezoning Request: Heavy Industrial, M-2

Conditional Use Permit Requests:

- (1) Permit the development of public facilities/utilities on the Property; and
- (2) Increase the permitted height of any data center building(s) constructed on the Property to no more than one hundred five feet (105’); and
- (3) Increase the permitted height of any electric transmission and substation facilities (“Electric Facilities”) constructed on the Property to no more than one hundred five feet (105’).

File No.: RC _____
CUP _____

I. Application Request. The Applicant and Owner hereby request the following:

(i) a rezoning of Stafford County Tax Map Parcels 28-87, 29-32, 29-36, 29-39C, 29-81, 29-82, 29-83, 37-63, 38-1, 38-1A, 38-3, 38-4, 38-4C, 38-55, 38-66, 38-67, 38-68A, 38-70, 38-71, 38-77A, collectively consisting of approximately 1,041.68907 acres (the “Property”) from Urban Commercial, B-2; Urban Residential – High Density, R-3; Light Industrial, M-1; Rural Residential, A-2; and Agricultural, A-1 (as applicable) to Heavy Industrial, M-2 to develop data center facilities and supporting accessory uses;

(ii) a conditional use permit (“CUP”) to permit (a) the development of public facilities/utilities (including without limitation the Electric Facilities) at a height not to exceed one hundred five feet (105’); and (b) the development of data center facilities at a maximum height of one hundred five feet (105)¹, all in accordance with the Stafford County, Virginia (the “County”) Zoning Ordinance, including without limitation Article III, Section 28-35, Article X, Section 28-161, et seq., Article XI, Section 28-181, et seq., and Article XII, Section 28-201, et seq. (the “Code”).

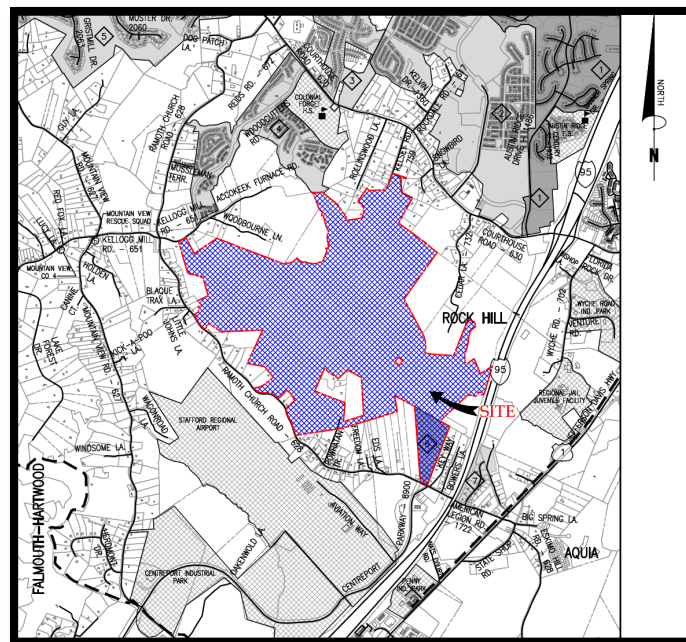


Figure 1: Site Map

The Property is located near the Interstate-95 and Courthouse Road interchange, within the Hartwood District, all as more particularly shown on the GDP, which is attached hereto and incorporated as a material part of this application by this reference. The acreage, as mentioned above, that is subject to these requests consists of approximately 1,042 acres.

The Applicant has also submitted a voluntary proffer statement that, in relevant part, limits the uses permitted on the Property and details improvements and cash contributions to be made by the Applicant to mitigate the Project’s anticipated impacts on public facilities, as further discussed herein (the “Proffer Statement”).

¹ Subject to the provisions of Section 28-24 of the County’s zoning ordinance.

II. Rezoning Overview. The Applicant is Garrett Development Corporation d/b/a The Garrett Companies (Stafford CO) (“GDC”), headquartered in Stafford County at 51 Barrett Heights Road. GDC was founded in 1987 by Andrew Garrett and began by building custom homes in Northern Virginia. Having achieved a high level of success in the custom home industry, GDC expanded into residential lot development during the early 1990’s and later into commercial property development during the late 1990’s. With nearly forty (40) years of development experience, GDC prides itself in its abilities to both identify viable development opportunities and develop a variety of product types that have resulted in GDC becoming a recognized leader in land and commercial development in the Northern Virginia area. GDC is looking forward to once again working with the County to provide a top-notch industrial campus, which is anticipated to include approximately 7.9 million square feet of data center facilities and related accessory uses.

As further noted above, the Property is currently zoned Urban Commercial, B-2; Urban Residential – High Density, R-3; Light Industrial, M-1; Rural Residential, A-2; and Agricultural, A-1. The Applicant proposes a reclassification of the Property’s zoning districts to M-2 to allow for the development of an industrial campus – including without limitation data center facilities. Section 28-35 of the County’s Zoning Ordinance states that the purpose of the M-2 zoning district is:

to provide areas within the county suitable for a variety of industrial type uses which may not be compatible with residential uses due to some potential nuisance or hazard. The development of "industrial parks" in the M-2 district are encouraged. [. . .] These districts should only be located where all necessary public utilities are available and where transportation systems are adequate.

In this regard, the Project is anticipated to include approximately 7.9 million square feet of single or multi-tenant industrial uses along with accessory uses on approximately 1,042 acres.



Figure 2: Illustrative Concept Plan

As briefly noted above, the Property is generally located between Interstate-95 to its east and Ramoth Church Road to its south, and on the south side of Courthouse Road. To the east of the Property is an industrial development, known as Austin Ridge Logistics, currently zoned M-1² and across Interstate-95 is a DHL warehouse site, zoned B-2. Adjoining the Property to the west is a mixture of vacant land, single family detached homes, and institutional uses, including Ramoth Baptist Church, Ramoth Baptist Church Food Pantry, Mountain View Rescue Squad and Fire Department, and a Crypto-Currency ATM location. To the south is a mixture of uses, including Kingdom Hall of Jehovah’s Witnesses, single family detached homes, vacant land, Capital Textile Service, Virginia Paving Company, and Stafford Regional Airport. To the north is a mixture of uses, including single family detached homes, Colonial Forge High School, Publix, Jeff Rouse Swim and Sport Center. In this regard, the Project is anticipated to include adequate setbacks, buffers, and other mitigation methods to ensure that it is complementary to the existing and future uses in this area.

As described in more detail below, the Applicant’s proposal is in accordance with the overarching policies established by the County’s Comprehensive Plan (“Comp Plan”). In this regard, the Property is within both the Central Stafford Targeted Development Area (“Central Stafford TDA”) and Courthouse Targeted Development Area (“Courthouse TDA”) and is within the County’s Urban Services Area (“USA”) for future land use purposes.³ In addition, the Property is anticipated to have minimal impacts on County services like schools, transportation, and parks; and the Project

² The Austin Ridge Logistics owners are seeking to rezone its property to M-2 to permit the development of data center facilities.

³ Note that in proximity to the Project, south of the Accokeek Creek is the Central Stafford TDA, which primarily consists of a mix of agricultural/rural, business and industry, and the Stafford Regional Airport. This nearby Central Stafford TDA is also complementary to this proposed Project.

is anticipated to generate new, higher paying jobs, and significant positive commercial tax revenues at full build-out, all as further detailed under the impact analysis of this narrative.

III. CUP Overview. In order to support its potential data center use, the Applicant requests a CUP to permit (i) the development of public facilities/utilities – including without limitation the Electric Facilities, which shall include a maximum height of one hundred five feet (105’); and (ii) any data center building(s) constructed on the Property to have a maximum height of one hundred five feet (105’), subject to the provisions of County Ordinance Section 28-24, which excludes spires, belfries, cupolas, antennas, communication towers, silos, barns, water towers, ventilators, chimneys, or other appurtenances usually required to be placed above the roof level and not intended for human occupancy. In the regard to the foregoing, Section 28-185(d) of the County’s Code requires CUP applications meet the following standards:

- 1. The use shall not tend to change the character and established pattern of development in the vicinity of the proposed use.*

Most surrounding properties are developed for complementary uses – including the NorthPoint industrial campus – which is currently zoned M-1 for warehouse and storage uses and is seeking a reclassification to the M-2 zoning district to allow the development of data center facilities. Further, the DHL warehouse located east across I-95, and the Old Potomac Church Tech Center – which includes data center and Electric Facilities at a height of ninety-five (95’). The Applicant’s proposal is not anticipated to change the character and established pattern of development in this area. Instead, this Project is consistent with the County’s Comp Plan and is expected to meet current market demands for industrial users and further complement and support the existing and future intended development pattern, as nearby uses include a variety of primarily commercial and industrial uses.

- 2. The use shall be in harmony with the uses permitted by right under a zoning permit in the land use district and shall not adversely affect the use of adjacent properties.*

The permitted uses in the M-2 district include data center uses, and other heavy industrial uses, which generally require the construction of public facilities/utilities. Accordingly, the Project is expected to support and complement by right uses under the M-2 zoning district, as well as the existing and future development pattern in this area.

- 3. The location and height of buildings, the location, nature and height of walls and fences and the nature and extent of landscaping on the site shall be such that the use will not hinder or discourage the appropriate development and use of adjacent land and buildings or impair the value thereof.*

The Applicant’s proposal is not anticipated to hinder or discourage the appropriate development of adjacent land. As depicted and described on the GDP, the Applicant will provide appropriate setbacks, buffer area, and open space around the Property’s perimeter to ensure impacts on adjacent properties are appropriately minimized.

4. *The use shall not adversely affect the health or safety of persons residing or working in the vicinity of the proposed use.*

Since the request is compatible with and will enhance surrounding development as described herein, the proposed Project is not expected to adversely affect the health or safety of persons residing or working in the vicinity of the proposed Project.

5. *The use shall not be detrimental to the public welfare or injurious to property or improvements in the neighborhood.*

Since the request is compatible with surrounding development as described above, the Project is not expected to be detrimental to the public or injurious to property or improvements in the area.

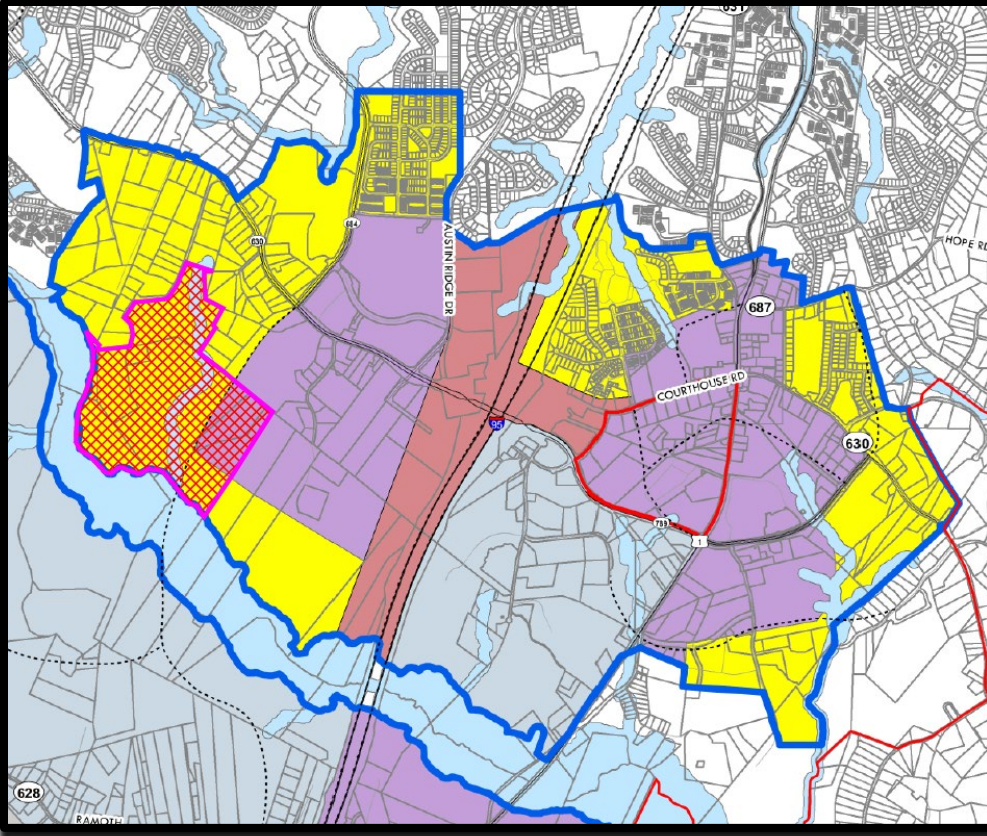
6. *The use shall be in accord with the purposes and intent of this chapter and the comprehensive plan of the county.*

For the reasons described herein, the Project is generally consistent with the County's applicable Code and Comp Plan.

IV. Comp Plan Analysis.

A. *The Property's Proposed Rezoning Classification Supports Project Approval.*

Most of the Project (south of Accokeek Creek) is within the Central Stafford TDA, and the entire Project is within the County's USA. The northern portion of the Project is within the Courthouse TDA. We believe overall the proposed rezoning and CUP requests are in accordance with the Comp Plan for this area of the County. In addition, given the development pattern north, south and east of the Property, the proposed use is more compatible than what is proposed under the Courthouse TDA. In addition, the proposed rezoning will have less of an impact on schools, public safety and traffic versus what is projected under the Courthouse TDA. In addition, the Project will have a positive impact on new economic development opportunities within the County, including without limitation new high paying jobs and significant County tax revenues. The Project will also construct and dedicate new transportation infrastructure, which will further support and expand the County's internal north-south transportation connection from Courthouse Road to Ramoth Church Road.



The Courthouse TDA does include the three following features:

- Commercial – Retail and Office. Development in this future land use designation is expected to occur in a manner to minimize noise, social, transportation and visual impacts on established residential neighborhoods.
- Mixed Use – Commercial/Residential. Development of these areas should be modeled using the principles of new urbanism with buildings three to four stories in height, or one or more commercial centers serving nearby residential uses; and stand-alone commercial areas with a mix of retail, office and industrial uses.
- Residential – Primarily single family detached residential unit types are recommended in these areas, along with complimentary recreation and community uses.

The Project does not include any retail, traditional commercial, or residential uses. Instead, this Project includes up to 7.9 million square feet of industrial use(s), which is anticipated to primarily consist of data center facilities and accessory uses (and will not include a mix of different use types), which is more consistent with the development pattern to the immediate north, east and south of the Property. Accordingly, we believe the Property is better suited for a business/industry use.

The Central Stafford TDA is also located in the geographical center of the County and includes 6,742 acres extending from Accokeek Creek, south to the vicinity of the Centreport interchange and Enon Road, along Interstate 95 and Route 1. Given the proximity of the Stafford Regional Airport and major transportation corridors this area is also envisioned to serve as an employment center and recommends 12,075,000 square feet of commercial development. The Central Stafford TDA also provides an opportunity for residents to work where they live, reducing commute times and providing a positive tax base for the County. The Central Stafford TDA is split into various future development designations, including business and industry, mixed-use, and residential. This Property is located within the business and industry designation of the Central Stafford TDA which, as mentioned above, is recommended to serve as one of the employment centers in the County and accommodating a wide range of commercial activities.

As discussed throughout this narrative, the development of the immediate adjacent land is generally industrial – to include warehouse, distribution, and data center developments. Further the proposed use generates less traffic than a typical retail and commercial center and heavy industrial site as the Project, during operations, will not include truck traffic and employees typically travel to and from the Project facilities in three different shifts during non-peak traffic periods. In addition, the County’s future land use plan recommends business and industrial uses to the immediate south of the Property, and in particularly the Centreport area of the County. The surrounding uses coupled with the Property and Project being partially located in the Stafford Central TDA, which does contemplate the Property as having the future land use designation of business and industry, would provide a more harmonious land use designation for the both the Project and the Comp Plan. Further, the portion of the Property located within the Courthouse TDA is approximately 209 acres, or 20% of the contemplated project area.

Further, the Property and surrounding parcels are further located strategically along Interstate-95 and Courthouse Road, making this area ripe for research and technology, data centers, general office, warehousing, manufacturing, and other uses encouraged within the business and industry future land use designation. Finally, the business and industry uses in this area are compatible with the operations associated with the Stafford Regional Airport with some exceptions. While the Comp Plan notes that commercial development is generally acceptable and consistent with airport operations, there are some considerations that should be made for compatible commercial development adjacent to an airport:

- Building and Site Design. In areas that are highly visible to residents and visitors traveling through the area, structures should be designed in accordance with the Architectural Guidelines in the Neighborhood Design Standards Plan, and enhanced building design is recommended. In this regard, the Applicant has included proffered building features and materials to meet this consideration (as further detailed in the Proffer Statement).

- Public Facilities. As discussed further below, this Project is not anticipated to significantly impact public facilities. However, please note that this proposed Project will include the following transportation improvements:

- At the intersection of Courthouse Road/Mine Road/Mine Extended:

- Construction of an eastbound right turn lane (200’);
 - Construction of a westbound left turn lane (300’);
 - Construction of a northbound right turn lane (300’);
 - Construction of two northbound through lanes (one through lane with 1,000’ of storage);
 - Construction of a northbound left turn lane (200’);
 - Restriping of one southbound through lane;
 - Traffic signal improvements.
- At the intersection of Ramoth Church Road/Centreport Parkway/Mine Extended:
 - Construction of an eastbound left turn lane (100’);
 - Construction of a westbound left turn lane (100’);
 - Construction of a southbound left turn lane (100’);
 - Construction of a southbound through-right lane.
 - At the intersection of Mine Extended/Woodcutters Extended:
 - Construction of a northbound left turn lane (100’);
 - Construction of a southbound right turn lane (100’);
 - Construction of an eastbound right turn lane (100’).
 - Construction of Mine Extended as a two-lane cross section between Courthouse Road and Ramoth Church Road.
 - Dedication of right of way for a four-lane cross section between Courthouse Road and Ramoth Church Road.
 - Construction of Woodcutters Extended as a two-lane cross section between Kellogg Mill Road and Mine Extended.
 - Dedication of right of way for a four-lane cross section between Kellogg Mill Road and Mine Extended.

These improvements are anticipated to ensure that there are adequate transportation facilities not only to serve this Project, but also the regional growth expected to occur. Further, this Project is anticipated to generate significant tax revenues for the County, which will help support the maintenance and development of existing and future public facilities.

- Phasing of Development. To ensure appropriate development of this area, the Comp Plan encourages that new, large developments be phased. In this regard, the Project is anticipated to be phased over approximately 20 years.

Accordingly, this Project is aligned with the current development pattern of the area, addresses the community vision through increasing non-residential uses and the County’s tax base, and is compatible with the airport.

B. *The Project Satisfies the Overall Comp Plan and Courthouse/Stafford Central TDA Goals for Future Development.*

Notwithstanding the foregoing, the County has articulated its overarching goals for future development and land use in its Comp Plan, which serves as a general guide for the County's future development over the next 20 years. According to the Comp Plan, new development must (1) be sustainable and promote positive job growth, and (2) promote economic development.

The Applicant's proposal satisfies these development goals, as detailed below:

i. *The Project contributes to the County's sustainable and positive growth.*

The Project satisfies the County's goals for new development within USAs. Its location within the USA furthers the County's goal for locating new growth therein, supporting more compact development patterns and reducing pressure on the rural parts of the County. Further, the Project's commercial nature, job creation, and positive tax revenues meets the County's goal for this area to be developed.

ii. *The Project's location within the USA supports development.*

As briefly described above, USAs are areas designated within the County in which growth should occur in order to reduce growth pressure in rural parts of the community. More dense development projects are encouraged within these areas. USAs are further comprised of planning areas, suburban areas, business and industry areas, and redevelopment areas. Planning areas highlight the locations where a significant amount of new development and redevelopment – both commercial and residential – is expected to occur.

In this regard, the Project satisfies the County's goals for new development within USAs. As discussed above, its location within the USA furthers the County's goal for locating new growth within the USA. The Project will be serviced by new and existing public sewer and water utilities (for non-industrial cooling purposes).

iii. *The Project's location within the Courthouse and Central Stafford TDA supports development.*

Not only does the Project's location in the USA support approval of the rezoning request, but its general location is within the Courthouse and Central Stafford TDA bolsters support for this rezoning proposal. The County anticipates that a significant amount of new commercial development will occur within this Courthouse TDA. In fact, this Courthouse TDA is the number one area where growth in the County should be focused. For this overall Courthouse TDA, the County anticipates 5,500,000 square feet of new non-residential development in the near future. This Project alone exceeds this goal.

The Central Stafford TDA openly recommends to serve as an employment center in the County to serve a wide range of commercial activities, including research and technology and data centers, and providing for the development of large scale camps style office parks and light industrial parks.

In keeping with the County's intentions, the Project will bring this near-term development goal to fruition and the resulting new industrial uses would contribute significantly to the County's anticipated commercial and employment growth in this planning area.

iv. *The Project promotes the County's economic development.*

The Project's location within the USA and Courthouse and Central Stafford TDA, as well as its industrial characteristics, promote the County's economic goals of job creation while supporting retention and growth of the County's existing businesses and industries.

The Comp Plan has set forth several economic development goals and requirements for new developments. First, the County seeks to promote its reputation as a business-friendly community. Second, the County encourages the development of accessible, convenient, and attractive non-residential locations within the USA.

The Project satisfies all these goals. First, it brings new business and industry to the area, thereby diversifying the County's economic base and promoting job creation. Second, the Project's strategic proximity to Interstate-95 and Courthouse Road is accessible, convenient, and attractive, and, as previously discussed, the Project is in an area that has been identified by the County as an economic development priority focus area, where business development is encouraged. Third, the non-residential nature of development will offset the demands on community facilities and infrastructure of surrounding residential communities and will provide economic revitalization in an area designated by the County as a key development area.

As further discussed below, the Project is expected to create a minor expenditure for the County, which is significantly offset by the large revenues generated by the Project under both sets of assumptions.

V. Virginia 2232 Review. As a part of this Project, the Applicant is working with Dominion Energy to develop and construct five (5) +/- electrical substations and applicable accessory equipment on the Property, which requires the County to complete a Comp Plan Compliance Review (also known as a "2232 Review"). The 2232 Review requires that the County determine whether the location of the electrical substations and their accessory equipment on the Property is substantially in accord with the Comp Plan, pursuant to Virginia Code Section 15.2-2232.

For purposes of the 2232 review, the Property is within the County's USA. Given the developing infrastructure in this area, the construction of five (5) +/- additional substations is not entirely out of character (the "Substations"). The Substations are strategically located on the Property to limit visual and audible impacts to surrounding properties. As shown on the GDP, the locations of the Substations limit their visibility and audibility from the surrounding areas. Further, the Substations will not generate traffic, nor does it add another access point onto the surrounding roads. Additionally, the Project is in harmony with the scale, bulk, coverage, density, and character of

the area. This area is largely intended for industrial and residential uses, and the Substations, in addition to being necessary to support the proposed data centers, have potential to serve the surrounding area. The Applicant does not believe that the Substations will impair the value of surrounding properties or adjacent land/buildings, and they will be sited within a large industrial campus where there will be adequate screening, setbacks and buffering all as shown on the GDP.

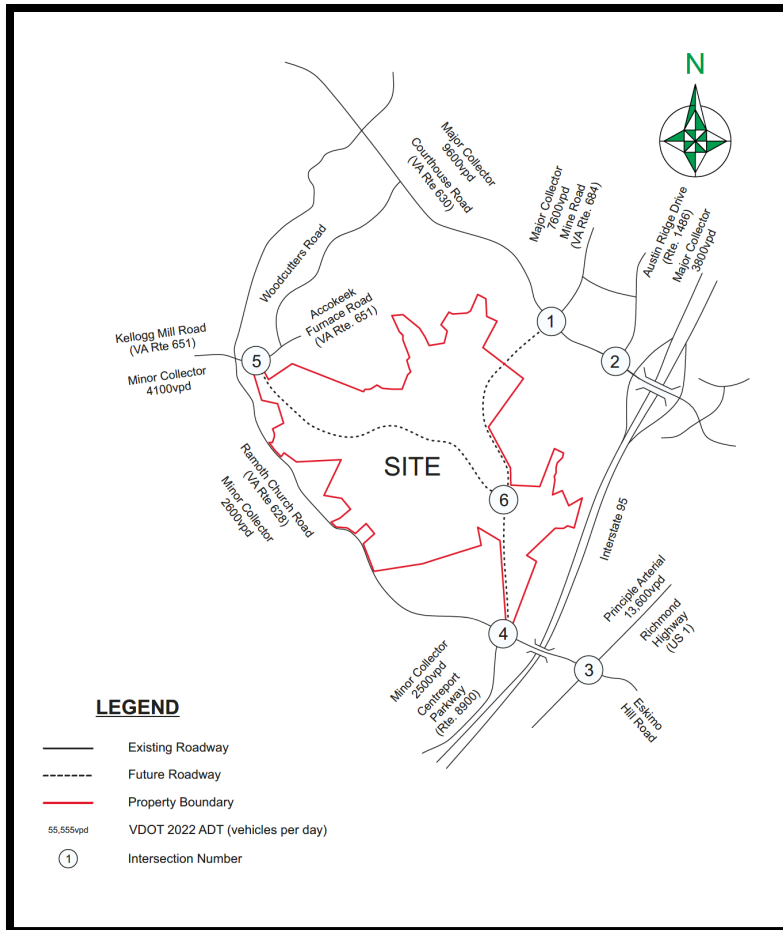
In summary, the proposed Substations are defined by the Code of Virginia as a “public utility” and therefore the County must determine whether it is in conformance with the Comp Plan. Under § 15.2-2232 of the Code of Virginia, a local Planning Commission should ensure that projects are substantially in accord (in conformance) with the locality’s Comp Plan. Generally, whenever the Planning Commission recommends a comprehensive plan or part thereof for the locality and such plan has been approved and adopted by the governing body, the Planning Commission is required to review proposed additions to these elements regarding the general or approximate location, character, and extent. Given that the proposed Substations are expected to have the ability to provide necessary service to the broader area and are appropriately located within the USA, we believe that these public utility uses are substantially in accord (in conformance) with the County’s Comp Plan.

VI. Traffic Impact Analysis. As briefly discussed above, the Applicant submitted a traffic impact analysis with this application titled “Traffic Impact Analysis GW Data Center Stafford County”, dated September 25, 2024, prepared by Green Light Solutions, and attached hereto as **Exhibit B** (the “TIA”). The TIA is intended to determine the impact of the Project to the surrounding roadway network.

In this regard, the TIA finds that upon full build-out the Project is expected to generate approximately 706 vehicles per hour (“VPH”) during the AM peak hour (388 VPH enter and 318 VPH exit), 236 VPH during the PM peak hour (71 VPH enter and 165 VPH exit), and 5,882 vehicles per day (“VPD”) on a typical 24-hour weekday.

There are three points of regional access proposed at the existing Courthouse Road/Mine Road; Ramoth Church Road/Centreport Parkway intersections with one point of access to be provided on Kellogg Mill Road between Ramoth Church Road and Woodcutters Road, as depicted within the GDP. Further, based on discussions and the scoping agreement between the Applicant, VDOT, and the County, it was determined that the TIA study area should include the following intersections/interchanges:

1. Courthouse Road/Mine Road/Mine Road Extended (Site Driveway #1)
2. Courthouse Road/Austin Ridge Drive
3. U.S. Route 1/Eskimo Hill Road/American Legion Road
4. Ramoth Church Road/Centreport Parkway/Mine Road Extended (Site Driveway #2)
5. Kellogg Mill Road/Woodcutters Road Extended (Site Driveway #3)
6. Mine Road Extended/Woodcutters Road Extended



The TIA analysis of full build-out peak hour traffic conditions indicates that all study area intersections are expected to maintain acceptable operational measures of effectiveness under both AM and PM peak hour traffic conditions except for the intersection of Courthouse Road and Mine Road. As a part of the proposed Project, mitigation for said intersection will be provided, as summarized below and further provided in the Proffer Statement:

As a part of the Project’s development, the TIA recommends the following improvements:

- At Courthouse Road/Mine Road/Mine Road Extended:
 - Construct an eastbound right turn lane (200ft);
 - Construct a westbound left turn lane (300ft);
 - Construct a northbound right turn lane (300ft);
 - Construct two northbound through lanes (one through lane with 1000ft of storage);
 - Construct a northbound left turn lane (200ft);
 - Restripe one southbound through lane;
 - Implement traffic signal improvements.
- At Ramoth Church Road/Centreport Parkway/Mine Road Extended:

- Construct an eastbound left turn lane (100ft);
 - Construct a westbound left turn lane (100ft);
 - Construct a southbound left turn lane (100ft); and
 - Construct a southbound through-right lane.
- At Mine Road Extended/Woodcutters Road Extended (future intersection):
 - Construct a northbound left turn lane (100ft);
 - Construct a southbound right turn lane (100ft); and
 - Construct an eastbound right turn lane (100ft).
- Construct Mine Road Extended as a two-lane cross section between Courthouse Road and Ramoth Church Road.
 - Dedicate right-of-way for a four-lane cross section between Courthouse Road and Ramoth Church Road.
 - Construct Woodcutters Road Extended as a two-lane cross section between Kellogg Mill Road and Mine Road Extended.
 - Dedicate right-of-way for a four-lane cross section between Kellogg Mill Road and Mine Road Extended.

A. Scenario Scope. Based on the pre-scope of work meeting with VDOT and the County, the following scenarios were identified to be studied in the TIA:

- i. Existing (2024) Peak Hour Traffic Conditions
- ii. Background (2030) Plus Approved (percent buildout) Peak Hour Traffic Conditions
- iii. Buildout (2030) Plus Approved (percent buildout) Peak Hour Traffic Conditions

B. Existing (2024) Traffic Conditions. The overall unsignalized intersection movements and signalized intersection levels of service are operating at acceptable levels. However, the following specific movements are identified in the TIA as operating at unacceptable levels of service:

- i. Intersection #1: Courthouse Road and Mine Road
 - 1. Eastbound left movement
 - 2. Southbound left movement
- ii. Intersection #2: Courthouse Road and Austin Ridge Drive
 - 1. Eastbound left movement
 - 2. Southbound left movement

Further, the existing storage bays are sufficient for existing 95th percentile traffic queues with the following exception:

- i. Intersection #1: Courthouse Road/Mine Road
 1. Eastbound left movement

C. Background (2030) Plus Approved Traffic Conditions. Without the development of the Project, and with the development of twenty-one approved projects (as listed more specifically in the TIA), the peak hour traffic conditions in 2030 are expected to be mitigated by the approved buildout roadway improvements, allowing study intersections to operate at acceptable overall intersection levels of service. However, please note that the TIA does not assume total buildout of said approved developments by 2030.

While general levels of service are expected to be acceptable, the following movements were identified in the TIA as being unacceptable (*italics print denotes movement at unacceptable levels of service in existing conditions*):

- Intersection #1: Courthouse Road and Mine Road
 - *Eastbound left movement*
 - Westbound through movement
- Intersection #2: Courthouse Road and Austin Ridge Drive
 - *Eastbound left movement*
 - Westbound left movement
 - *Southbound left movement*
 - Southbound left-through movement
- Intersection #3: US 1 and Eskimo Hill Road/American Legion Road
 - Eastbound left movement
 - Eastbound through-right movement
 - Westbound left movement
 - Westbound through-right movement

As shown in the TIA, Table 3, each of the existing/future storage bays are sufficient for existing 95th percentile traffic queues with the following exceptions (*italics print denotes movement at unacceptable queue length in existing conditions*):

- Intersection #1: Courthouse Road/Mine Road
 - *Eastbound left movement*
 - Westbound right movement

- Intersection #2: Courthouse Road/Austin Ridge Drive
 - Eastbound left movement
 - Westbound right movement
 - Southbound left movement
 - Southbound right movement
- Intersection #3: US 1 and Eskimo Hill Road/American Legion Road
 - Southbound left movement

D. Site Trip Generation Analysis. As mentioned throughout this narrative, the Project is anticipated to consist of approximately 7.842 million square feet of data center buildings on the Property, with accessory uses. For the purposes of the TIA, the Project is anticipated to be completed by 2030.

In this regard, and as briefly mentioned above, the complete Project is anticipated to generate approximately 5,882 VPD during an average weekday, 706 VPH during the AM peak hour (388 VPH enter and 318 VPH exit), 236 VPH during the PM peak hour (71 VPH enter and 165 VPH exit).

| Land Use | Density | ITE Code | AM Peak Hour (vph) | | PM Peak Hour (vph) | | Daily (vpd) |
|--------------------|-------------|----------|--------------------|------------|--------------------|------------|--------------|
| | | | Enter | Exit | Enter | Exit | Total |
| Data Center | 7,842,000sf | 160 | 388 | 318 | 71 | 165 | 5,882 |
| Total Trips | | | 388 | 318 | 71 | 165 | 5,882 |

E. Build-Out (2030) Traffic Conditions. Peak hour traffic conditions are expected to be maintained at all study intersections except for the intersection of Courthouse Road and Mine Road. Further, the following movements are identified in the TIA as operating at unacceptable levels of service (*italics print denotes movement at unacceptable levels under conditions without the development of the Project, and with the development of twenty-one approved projects detailed in the TIA*):

- Intersection #1: Courthouse Road and Mine Road
 - *Eastbound left movement*
 - Westbound left movement
 - *Westbound right movement*
 - Northbound left movement
 - Northbound through movement
 - Southbound left movement
- Intersection #2: Courthouse Road and Austin Ridge Drive
 - *Eastbound left movement*

- Eastbound right movement
 - *Westbound left movement*
 - Northbound left-through-right movement
 - *Southbound left movement*
 - *Southbound left-through movement*
- Intersection #3: U.S. Route 1 and Eskimo Hill Road/American Legion Road
 - *Eastbound left movement*
 - *Eastbound through-right movement*
 - *Westbound left movement*
 - *Westbound through-right movement*

Each of the existing and future storage bays are sufficient for existing 95th percentile traffic queues with the following exceptions (italics print denotes movement at unacceptable levels under conditions without the development of the Project, and with the development of twenty-one approved projects detailed in the TIA):

- Intersection #1: Courthouse Road/Mine Road
 - *Eastbound left movement*
 - *Westbound right movement*
 - Southbound left movement
- Intersection #2: Courthouse Road/Austin Ridge Drive
 - *Eastbound left movement*
 - *Westbound right movement*
 - *Southbound left movement*
 - *Southbound right movement*
- Intersection #3: U.S. Route 1 and Eskimo Hill Road/American Legion Road
 - *Southbound left movement*

F. Conclusions and Recommendations. The TIA concludes that all study intersections are expected to maintain acceptable operational measures of effectiveness under both AM and PM peak hour traffic conditions except for the intersection of Courthouse Road and Mine Road.

As part of the current plan of development, it is recommended that the Applicant construct and/or implement the following improvements within the study area for this Project:

- At Courthouse Road/Mine Road/Mine Road Extended:
 - Construct an eastbound right turn lane (200ft)

- Construct a westbound left turn lane (300ft)
 - Construct a northbound right turn lane (300ft)
 - Construct two northbound through lanes (one through lane with 1000ft of storage)
 - Construct a northbound left turn lane (200ft)
 - Restripe one southbound through lane;
 - Implement traffic signal improvements.
- At Ramoth Church Road/Centreport Parkway/Mine Road Extended:
 - Construct an eastbound left turn lane (100ft)
 - Construct a westbound left turn lane (100ft)
 - Construct a southbound left turn lane (100ft)
 - Construct a southbound through-right lane
 - At Mine Road Extended/Woodcutters Extended:
 - Construct a northbound left turn lane (100ft)
 - Construct a southbound right turn lane (100ft)
 - Construct an eastbound right turn lane (100ft)
 - Construct Mine Road Extended as a two-lane cross section between Courthouse Road and Ramoth Church Road.
 - Dedicate right-of-way for a four-lane cross section between Courthouse Road and Ramoth Church Road.
 - Construct Woodcutters Road Extended as a two-lane cross section between Kellogg Mill Road and Mine Road Extended.
 - Dedicate right-of-way for a four-lane cross section between Kellogg Mill Road and Mine Road Extended.

VII. Impact Analysis.

A. Current capacity of and anticipated demands on highways, utilities, storm drainage, schools, and recreational facilities:

i. **Roads.** As described in the TIA, all study intersections are expected to maintain acceptable operational measures of effectiveness under both AM and PM peak hour traffic conditions except for the intersection of Courthouse Road and Mine Road. Accordingly, the Applicant is anticipated to mitigate its proposed impacts to the transportation infrastructure by providing its above-described improvements.

ii. **Utilities.** As noted above, the proposed Project is located within the County’s USA with access to public water and sewer. Existing water and public sewer mains are available along

Austin Ridge Drive and Courthouse Road. Water and sewer will be utilized only for employee and general operational purposes, and not for industrial cooling. In this regard, the Applicant has proffered that no potable water will be used for industrial cooling purposes unless otherwise approved by the County's Utility Department.

1. *Public Water*. The Project is located within the Central Pressure Zone. There is an existing public water line along Austin Ridge Drive.

2. *Sewer*: The Project is in the Accokeek Sewer Shed sewer service area. An existing public sewer line is located along Courthouse Road, as well on and through adjacent properties to its east. More information, including gallons per day, will be provided in connection with each site plan and building permit review.

3. *By-Right Impact*. If developed by-right, the Applicant would likely have to connect to public water and sewer as well.

iii. **Storm Drainage**. The Project will be constructed in accordance with local, state, and federal regulations. For stormwater management purposes, the Virginia Department of Environmental Quality regulations for both quality and quantity will be met as required by local and state code. Final design for both quality and quantity treatment will be shown in connection with each site plan submitted for this Project. Note that both the by-right and proposed developments would result in the same post-developed flow requirements and would have minimal impacts downstream.

iv. **Schools**: The Project will not impact schools.

1. *By-Right Impact*. The Applicant could construct approximately 300 single family detached homes on portions of the Property zoned A-1 and A-2 without any proffers or conditions to off-set the increase of anticipated students generated therefrom within the County.

2. *Future Land Use Plan*. Based on the anticipated number of residential units noted above, the Property could yield 284⁴ students at an estimated cost to the County of \$4,348,324⁵, without proffers to offset said expenditure.

v. **Recreational Facilities**: The Project will not impact public recreational facilities.

1. *By Right Impact & Future Land Use Plan*. While portions of this Property could be developed for by-right residential uses, such development and the Property's development pursuant to the future land use plan would not be expected to materially impact public recreational facilities given this area's high level of recreational service pursuant to the County's Parks, Recreation, and Community Facilities Department Parks Utilization Plan (Phase II), dated January 2017.

⁴ Pursuant to the County's Comp Plan single family detached homes have a student generation rate of 0.947 students per home (300*0.947=284.1 students).

⁵ The [County public schools](#) adopted an estimated expenditure per pupil of \$15,311 (\$15,311*284= \$4,348,324).

B. Fire and Rescue. It is anticipated that the proposed Project will be served by Station #2, which is located east of the Project, or Mountainview Volunteer Fire Department, which is located west of the Project. Further, the Applicant will provide an emergency action plan in collaboration with the County Fire, Rescue & Emergency Services Department (as more particularly described in the Proffer Statement).

C. Fiscal Impact. The proposed Project is anticipated to have a significant positive fiscal impact on the County, as follows:

- It is anticipated that there will be approximately 1,656 new data center jobs upon full build-out.
- The construction of the data center buildings, construction and installation of associated infrastructure, and the purchase and installation of data center equipment is anticipated to cost approximately \$42.8 billion.
- New County tax revenues from the Project are expected to rise from \$24 million annually during the first year of operations in 2028 to \$268.5 million annually in 2035 before leveling out in 2041 at \$253.2 million annually

D. Environmental Impact. The Applicant requested that TNT Environmental, Inc. (“TNT”) evaluate the boundaries of the jurisdictional wetlands and other waters of the U.S. (i.e., streams) with a wetland delineation, which was confirmed which was confirmed with the U.S. Army Corps of Engineers (USACE) via a preliminary jurisdictional determination (PJD) issued January 26, 2003 (NAO-2021-03109). Wetlands identified on the project site are classified as palustrine forested (PFO), palustrine scrub/shrub (PSS), and palustrine emergent (PEM) wetlands.

The main source of hydrology for these wetlands is a combination of high groundwater table and floodwaters from Accokeek Creek, which runs throughout the site. Other waters on site include Accokeek Creek, and several unnamed perennial, intermittent, and ephemeral streams.

TNT conducted a Perennial Flow Determination (PFD) and Critical Resource Protection Area Delineation (CRPA) for the study area in general accordance with the North Carolina Division of Water Quality (NCDWQ) Stream Identification Method which is the accepted protocol in Stafford County. In accordance with Chapter 27B of the County’s Chesapeake Bay Preservation Area (CBPA) Policy and the Virginia DCR, the preliminary CRPA boundaries within the study area are mapped 100-feet upslope or landward of the perennial stream boundaries and contiguous wetlands. The site-specific preliminary CRPA encompasses approximately 303 acres (29%) of the study area. The CRPA delineation will be submitted to Stafford County for approval.

The soil survey indicates that the site is underlain primarily by Aura gravelly fine sandy loam (AvB, AvC2, AvD2, AvE2), Aura-Galestown-Sassafras complex (AwD, AwE), Bibb fine sandy loam (Bb), Bladen loam (Bd), Bourne fine sandy loam (BmB), Bourne loam (BoB), Caroline fine sandy loam (CaB2, CaC2, CaD2), Caroline clay loam (CcC3, CcD3), Caroline-Sassafras complex (CdE), Craven loam (CrB), Iuka fine sandy loam (Iu), Kempsville fine sandy loa, (KfB, KfC2, KfD2), Mecklenburg loam (MkB2, MkC2), Sassafras fine sandy loam (SfA, SfB, SfC2, SfD2, SfE2), Tetotum fine sandy loam (TeA, TeB, TeC2), and Watt silt loam (WgE). Other land types

mapped on site include Alluvial land (Ae), Cut and fill land (Cw), Fresh water swamp (Fs), Stony rolling land (StD), and Stony steep land (StE). Alluvial land (Ae), Bibb fine sandy loam (Bb) and Bladen loam (Bd) are classified by the NRCS as predominantly hydric.

Regarding the above, the Applicant is mindfully designing the Project to limit its impact on the above environmental features of the Property, as appropriate. Any development utilizing the same developable area will have the same or similar impacts on environmentally sensitive features.

E. Impact on Adjacent Properties. Generally, nearby properties are a mix of industrial, commercial, and residential uses, as well as vacant land. The proposed development is compatible with and a good transition between development on surrounding properties, and we do not believe there will be any adverse impacts to those properties. Any adverse impacts to the surrounding properties will be mitigated by the Applicant.

Further, note that the Applicant is working with a sound analyst, Polysonics Acoustics Technology Consulting (“Polysonics”), to determine existing background noise around the Property, which such study will be provided to the County upon Applicant’s receipt thereof. Polysonics was founded in 1958 and is a professional consulting firm that specializes in acoustics and technology solutions. The Applicant will work with Polysonics to help design the Project to minimize potential noise impacts to adjacent properties, and has committed to further sound restrictions summarized below and further described in the Proffer Statement:

- Any noise emanating from the Project between the hours of 7:00 AM EST and 10:00 PM EST weekdays and from 9:00 AM EST to 10:00 PM EST on Saturdays, Sundays, and legal holidays observed by the County government, shall be subject to a maximum permissible sound level of 55 dB(A) where adjacent to parcels in residential and mixed use zoning districts.
- For any source of sound that has a prominent discrete tone component, the levels established by the Noise Ordinance and Section VII(a) above shall be reduced by 3 dBA.
- Sound or noise measurements will be taken to confirm compliance with the Noise Ordinance and Proffer Statement, six (6) months after a final occupancy permit for each data center building is issued and then annually between the months of June and August.

F. Historical Sites. As a part of this application, Dovetail Cultural Resource Group (“Dovetail”) prepared a Summary Memo of previous cultural resource studies conducted on the Property titled “Summary Memo on the George Washington Village (GWV) Stafford Springs Project Area in Stafford County, Virginia”, dated July 9, 2024, and attached hereto as **Exhibit C** (“Summary Memo”). Pursuant to the Summary Memo, Dovetail recommends avoidance of ground disturbance or further studies be completed in certain areas described below.

Specifically, Dovetail recommends avoidance of ground disturbance in the vicinity of the Ball Stockford Family Cemetery (089-5577/44ST1207) and the Ball-Lunsford Family Cemetery (089-5578/44ST1206). Additionally, Dovetail recommends that a 50-foot buffer should be established around the Ball-Stockford Family Cemetery (44ST1207)/089-5577). Though two cemeteries could not be found during survey and are likely located outside of the Project area boundaries (Norman

Cemetery [089-0063/44ST1208] and unknown family cemetery [089-5576]), Dovetail recommends that additional work may be appropriate if ground disturbance is proposed in their mapped vicinity – specifically near the Norman Cemetery to conclusively determine whether the depressions noted in the field represents interments. Should the Project encroach on where the Norman Family Cemetery (44ST1208/089-0063) is mapped, Dovetail recommends archaeological monitoring be conducted.

Further, Dovetail found that most of the archaeological sites recorded were recommended not eligible for listing in the NRHP with DHR concurring. However, Site 44ST1291, a nineteenth-century domestic site with an intact foundation and likely associated with the Moncure family, has the potential for intact subsurface cultural deposits that may contribute to research into the rural occupation of the County and its residents. Site 44ST1291 was thus recommended potentially eligible for inclusion in the NRHP. Sites 44ST1302 and 44ST1305 are rockshelters with potential habitations dating to the precontact period. Excavation was not completed within these shelters during the Phase IB survey in compliance with DHR regulations; a permit must be issued from the DHR and Department of Conservation and Recreation prior to any excavation (DHR 2017:44). No artifacts were recovered near these sites, though the scarcity of rockshelters and high potential for encountering intact features requires further investigation. As such, sites 44ST1302 and 44ST1305 were recommended as potentially eligible for inclusion in the NRHP. DHR concurred with these recommendations, and Phase II archaeological testing is required.

One architectural resource was inaccessible during previous investigations, 089-5735. Dovetail and DHR recommend a revisit, including survey and photography, of this resource. DHR further recommends that, if a revisit is not conducted, the resources be treated as eligible for the NRHP.

Dovetail also recommends further research and delineation of the cemetery boundaries for site 44ST1317 to determine NRHP eligibility and whether or not the cemetery may contribute to a nearby archaeological site.

As more particularly detailed in the Proffer Statement, the Applicant has agreed to follow the reasonable recommendations of this Summary Memo and any subsequent studies prior to submitting a site plan that would be reasonably likely to disturb any potentially significant resources identified therein.

G. Exhibits: The following exhibits are enclosed with and are a material part of this application:

- i. Exhibit A: GDP
- ii. Exhibit B: TIA
- iii. Exhibit C: Summary Memo
- iv. Exhibit D: The Applicant will later supplement this application with a sound study once completed

Exhibit A

GDP

Exhibit B

TIA

Exhibit C

Cultural Resources Summary Memo

EXHIBIT D

“Sounds Study”

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