Narrative and Impact Statement

The Applicant, GAM 403 Mountain, LLC ("GAM"), seeks to rezone with proffers those certain parcels of land, consisting of approximately 45.692 acres, and shown on the records of the Stafford County ("County") Commissioner of the Revenue as Tax Map Parcel Numbers 46-10 and 46-8A (the "Property") from the County's A-1 (Agricultural), and M-1 (Light Industrial) Zoning Districts to the County's M-2 (Heavy Industrial) Zoning District to accommodate the development of the Cranes Corner Data Center ("Project").

Property and Project Background

The Property is located just north of the intersection of Centreport Parkway and Route 1 in the County's Falmouth Magisterial District and is partially within the County's Highway Corridor Overlay District. The majority of the Property (approximately 40.619 acres) is zoned to the County's M-1 Zoning District, with an approximately 5.41-acre portion zoned to the County's A-1 Zoning District. The A-1 zoned portion is occupied by a vacant single-family dwelling and accessory buildings and is surrounded by the M-1 zoned portion of the Property. The M-1 zoned portion of the Property is subject to proffered conditions, which do not limit or restrict the by-right uses thereof. With regard to the County's Comprehensive Plan, the Property is situated within the County's Central Stafford Targeted Development Area ("TDA") with a land use designation of Business and Industry on the County's Future Land Use Map. The Property is within the County's Urban Services Area ("USA") and is thus required to develop utilizing public water and sewer.

The Applicant seeks to rezone the Property with proffers to the County's M-2 Zoning District to accommodate development of the Project in general conformance with that certain Generalized Development Plan prepared by Legacy Engineering and submitted herewith (the "GDP"). As depicted on the GDP and described in the Proffers, the Project will consist of no more than 900,000 square feet of data center buildings and related infrastructure and accessory uses to serve the data center.

Data centers are the lifeblood of the modern digital economy, as data center facilities serve as the primary method of securing and storing data information for large and small businesses alike due to the vastly superior security protections that data centers offer over traditional storage hardware. Data centers provide integral data security and storage protection for virtually all of our digital activities, from email to remote work to online shopping to streaming music and video. As such, there exists a significantly robust and durable market demand for data centers, particularly in Commonwealth. The Commonwealth has emerged as the epicenter of data center development both nationally and globally, with more than 35% of all known hyperscale data centers worldwide located in the Commonwealth.

Consistent with the foregoing, the County's 2015 Economic Development Strategic Plan identifies data centers as a priority industry and recommends that the County identify and support sites suitable for high technology data centers. The County has further recognized the significant fiscal benefits associated with data center development. In this regard, a recent economic analysis prepared by the County's Economic Development Department and

Commissioner of the Revenue determined that new data center developments could be expected to provide $18.5 million in annual tax revenues per 1 million square feet of data center facilities.

The Project will provide the County with a state-of-the-art data center campus which will yield significant fiscal revenues for the County within the preferred location for data center development identified in the County's Comprehensive Plan. The Project will further feature extensive open space and buffers and will minimize impacts to adjacent properties while generating substantially less traffic than prospective by-right development of the Property under its existing zoning classifications, as further detailed below.

Comprehensive Plan – Land Use

The Property is located is located within the County's Central Stafford TDA with a future designation of Business and Industry on the County's Future Land Use Map. The County's recent amendment to its Comprehensive Plan (R23-214) provides that the "preferred location for data centers is within areas designated Business and Industry on the Future Land Use Map within the [USA]." Moreover, the Applicant has proffered consistency with the architectural design standards and other relevant recommendations for data centers set forth in R23-214, including proffering the use of air-cooling or closed-loop systems as an alternative to public water-based systems for cooling of data center equipment in order to mitigate impacts to public water supplies. Accordingly, the Project is consistent with the land use recommendations for the Property and the development recommendations for data centers set forth in the Comprehensive Plan.

Impact Statement

Pursuant to Sec. 28-203(d) of the Stafford County Zoning Ordinance, an analysis is required to describe the difference in impact to public facilities that would result from by-right development of the Property under the current A-1 and M-1 classifications in contrast to the proposed Project.

For comparison purposes, the by-right development under existing zoning classifications assumes the development of a single-family detached dwelling on the A-1 zoned portion and general office uses on the M-1 zoned portion of the Property. The Table below illustrates the public facility impact comparison between by-right uses currently permissible on the Property and the proposed Project. The vehicle trips per day ("VPD") set forth therein are based on the trip generation rates published in the Institute of Transportation Engineers ("ITE") Trip Generation Manual, 11th Edition. Utility impacts are measured in gallons of water used per day ("GPD").

Public Facility	**A-1 Single Family Dwelling**	**M-1 General Office**	**By-Right Total**	**M-2 – Data Center**

Highways	10 VPD	3,804 VPD at a rate of 10.84 trips per 1,000 sf assumed FAR of 0.2 (350,884 square feet of building area)	4,325 VPD at a rate of 10.84 trips per 1,000 sf assumed FAR of 0.2 (398,069 square feet of building area)	594 VPD
Utilities	350 GPD	7,455 GPD based on site plan for the Aquia Park development	7,805 GPD	13,000 GDP water 3,800 GPD sewer
Storm Drainage	Impacts to be mitigated per State Code and local ordinance	Impacts to be mitigated per State Code and local ordinance	Impacts to be mitigated per State Code and local ordinance	Impacts to be mitigated per State Code and local ordinance
Schools	One school age child	None	One school age child	None
Recreation facilities	2,614 square feet of parkland based on Comprehensive Plan Policy of 20 acres per 1,000 population	None	2,614 square feet of parkland based on Comprehensive Plan Policy of 20 acres per 1,000 population	None

A. <u>Public Highways</u>:

The Property will be accessed by Route 1 as generally depicted on the GDP. Route 1 is a principle arterial road which carries an average of 19,000 VPD at this location.

The Project is expected to generate an average weekday trip volume of 594 VPD. As detailed in the Table above, the by-right development of the Property under the current zoning classifications would be expected to generate an average weekday trip volume of approximately 4,325 VPD for general office uses for the M-1 portion (assuming 350,884 square feet of building area) and single-family residential use of the A-1 portion of the Property.

Thus, the Project will result in approximately seven times fewer VPD than by-right uses of the Property permitted under its existing zoning classifications. The Project will not adversely impact public highway facilities due to the low traffic volume generated by the proposed use.

B. Utilities:

Water: The Property is within the USA and must be served by public water. The water connections to serve the Property are generally depicted on the GDP. The comparative impact of data center uses of the Property relative to by-right uses of the Property is illustrated in the Table above. The increased impact denoted in the Table is primarily attributable to water evaporation that occurs when data center equipment is water-cooled. To mitigate this impact, the Applicant has proffered to utilize air-cooled, closed-loop, or other low impact, non-public water-based cooling systems for the cooling of data center equipment consistent with the recommendations of R23-214. Moreover, the Applicant will be responsible for all necessary water connections to serve the Property as well as any upgrades to existing water facilities necessary to serve the Project. The foregoing will ensure that the Project will not adversely impact existing public water facilities.

Sewer: The Property is within the USA and must be served by public sewer. The sewer connections to serve the Property are generally depicted on the GDP. The Project will not generate significant additional impacts to public sewer facilities as compared to by-right uses of the Property. The Applicant will be responsible for all necessary sewer connections to serve the Project. The proposed Project will not adversely impact existing public sewer facilities.

Storm Drainage/Stormwater: The Applicant will be responsible for providing stormwater and storm drainage facilities to serve the Project in accordance with federal, state, and local requirements. The proposed development of the Property will not adversely impact existing storm drainage and stormwater facilities.

C. Other Impacts.

Environmental Impacts: There exists no RPA on the Property. There are small intermittent stream segments at the southeast and southwest edges of the Property. The Project is configured to avoid impacts to these environmentally sensitive areas, and any disturbance thereto will comply with applicable federal, state, and local regulations. The Property in its current condition exists as a ridge and saddle landform, and there exists steeper slopes sloping toward the perimeter of the Property. The post-development condition will likely have more gentle slopes than the pre-development condition. The Applicant will be responsible for implementing mitigating measures for developed slopes steeper than 3:1 pursuant to the Zoning Ordinance. Additionally, the County's M-2 District regulations require twenty-percent (20%) of the Property to be preserved in open space, as does the County's M-1 District regulations which currently encompass the majority of the Property. As generally depicted on the GDP, the Project will preserve approximately 57% of the Property in open space well in excess of the foregoing requirements. The foregoing will ensure that the Project will not pose adverse environmental impacts.

Schools: The proposed Project will have no impact on schools.

Parks & Recreation: The proposed Project will have no impact on parks and recreation facilities.

Noise, Dust, and Smoke Impacts: The Applicant is required to provide sound studies to demonstrate compliance with the requirements of the County's Noise Ordinance. The Applicant has further proffered to install and implement all mitigation and attenuation measures recommended by said sound studies prior to receiving a Certificate of Occupancy for the first data center building subject to that sound study. The foregoing will ensure that the Project will not pose adverse noise impacts. There are no dust and smoke impacts associated with the proposed Project.

Light Impacts: Site lighting will be installed in compliance with Section 28-87 of the Zoning Ordinance. The Applicant has further proffered limitations on pole-mounted lighting that exceed the requirements of the Zoning Ordinance. The foregoing will ensure that the Project will not pose light impacts to adjacent properties or public rights-of-way.

Location of and proximity to designated and identified historic sites: There are no known historic sites identified on the Property. Portions of the Property were locally known to have been used for stone quarrying activities in the early 20th century. However, there are no buildings associated with any alleged quarrying activities on the Property.

Adjacent Properties: The Property is bounded to the west by Route 1 with the planned Stafford One Warehouse and Matan Warehouse industrial developments located on the opposite side. The Property is bounded to the south by Centreport Parkway with existing and planned commercial development located on the opposite side. The Property is surrounded to the north by vacant agricultural land with the planned Shimco Business Park located farther north along Route 1. There exists vacant agricultural land and a few individual single-family residences to the south and the east of the Property. The proposed development is consistent and compatible with the adjacent existing and planned uses. Any potential impacts to adjacent properties are addressed and mitigated by the substantial open space, screening, buffers, and setbacks for the Project, as generally depicted on the GDP. The open space, buffers, and setbacks proposed the Project are in excess of what would be required for by-right development of the Property under the current M-1 and A-1 zoning classifications. Moreover, as detailed above, the Project will generate significantly less traffic than by-right development of the Property under its existing zoning classifications, and thus will likely result in fewer impacts to the future development and values of adjacent properties.

Fire and Rescue: The Applicant has proffered that all data center buildings will include automatic fire suppression sprinklers and an automatic External Defibrillator ("AED") or comparable device in the location recommended by the Stafford County Fire and Rescue Department. The Applicant has further proffered to prepare and submit an Emergency Action Plan to the Stafford County Fire and Rescue Department at site plan and has proffered to install all fire suppression facilities required by the Emergency Action Plan prior to receiving a Certificate of Occupancy for the data center buildings subject to the Plan. The foregoing will ensure that the Project will not pose adverse impacts to Fire and Rescue facilities.

Architectural Design: The Applicant has proffered consistency with the architectural design standards for the data center development identified in the County's recent Comprehensive Plan amendment for data centers (Resolution R23-214).

Fiscal impact: The Project is expected to generate significant annual tax revenues for the County, as summarized in the revenue projections submitted herewith, which were prepared utilizing the methodology and data provided by the County's Economic Development Office. As detailed therein, the Project can be expected to generate up to $15,489,000.00 in annual tax revenue for the County at full build out. By contrast, the Property currently generates approximately $53,386.72 in annual tax revenue based on its 2024 fiscal year assessed value of $6,024,700.00.

Comprehensive Plan Compliance Review Pursuant to Virginia Code § 15.2-2232

The Applicant is currently coordinating with Dominion Energy to develop one electrical substation and related infrastructure (the "substation infrastructure") to serve the Project, as generally depicted on the GDP. The substation infrastructure is subject to a Comprehensive Plan Compliance Review pursuant to Virginia Code § 15.2-2232 ("2232 Review") wherein the Planning Commission determines whether the "general location or approximate location, character, and extent thereof" are substantially in accord with the Comprehensive Plan. The 2232 Review is conducted by the Commission through a separate public hearing process than the zoning reclassification. Since the Project is in the USA and must be served by public water and sewer, the 2232 Review is limited to an evaluation of the substation infrastructure.

As detailed above, the Property is located within the USA and has a future land use designation of Business and Industry, which the County's Comprehensive Plan identifies as the preferred location for data center development; such data center development is a prior industry for the County pursuant to the County's Economic Development Strategic Plan. Thus, the Project - and the substation infrastructure required to serve the same – are consistent in location and character with the County's Comprehensive Plan. In addition, Dominion Energy has proposed to construct a new substation adjacent to the Property and has proposed to extend electrical transmission lines which traverse the Property and areas adjacent thereto as part of the Dominion Energy Centreport 230 kV Transmission Line Project (the "Dominion Project"). The Dominion Project reflects the burgeoning technological and industrial development in this area and the concomitant demand for electrical energy to serve the same, which is consistent with the land use and development objectives identified in the County's Comprehensive Plan.

Moreover, the Applicant will provide extensive screening and buffering surrounding the substation infrastructure to limit visual and audible impacts to adjacent properties, as generally depicted on the GDP. In addition, the Applicant proposes to strategically locate the substation infrastructure away from existing single-family residences and closer to Route 1 where existing and planned industrial development is located, as generally depicted on in the GDP. Further, the Applicant will limit the extent of new substation infrastructure to what is necessary to serve this Project. Finally, substation infrastructure will not generate or require additional access points onto public roadways and is not expected to have adverse impacts on other public facilities.

Accordingly, the general location, character, and extent of the proposed substation infrastructure are substantially in accord with the Comprehensive Plan.