

STAFFORD COUNTY, VIRGINIA

IMPACT STATEMENT

Applicant: TC Blaisdell Owner, LLC, a Delaware limited liability company (the “Applicant”)

Owner: Please See **Exhibit A** (collectively, the “Owner”)

Applicant’s Representative: Charles W. Payne, Jr.
Hirschler
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Fredericksburg, Virginia 22401
540-604-2108 | cpayne@hirschlerlaw.com

Project Name: “Blaisdell Property Data Center”

Property: Stafford County Tax Map Parcels 53-1J, 53-1K, 53-1M, 53-1N, 53-1P, 53-1R, 53-1S, 53-1T, 53-1U, 53-1V, and 53-1W, consisting of approximately 181.336 acres (“Property”), as shown on the generalized development plan titled “GENERALIZED DEVELOPMENT PLAN BLAISDELL PROPERTY”, prepared by Bowman, dated November 2024, as last revised December 5, 2024 and attached hereto as **Exhibit B** (“GDP”)

Date: December 17, 2024

Rezoning Request: Urban Commercial, B-2 & Agricultural, A-1 to Heavy Industrial, M-2

Conditional Use Permit Request: Permit the development of public facilities/utilities on the Property

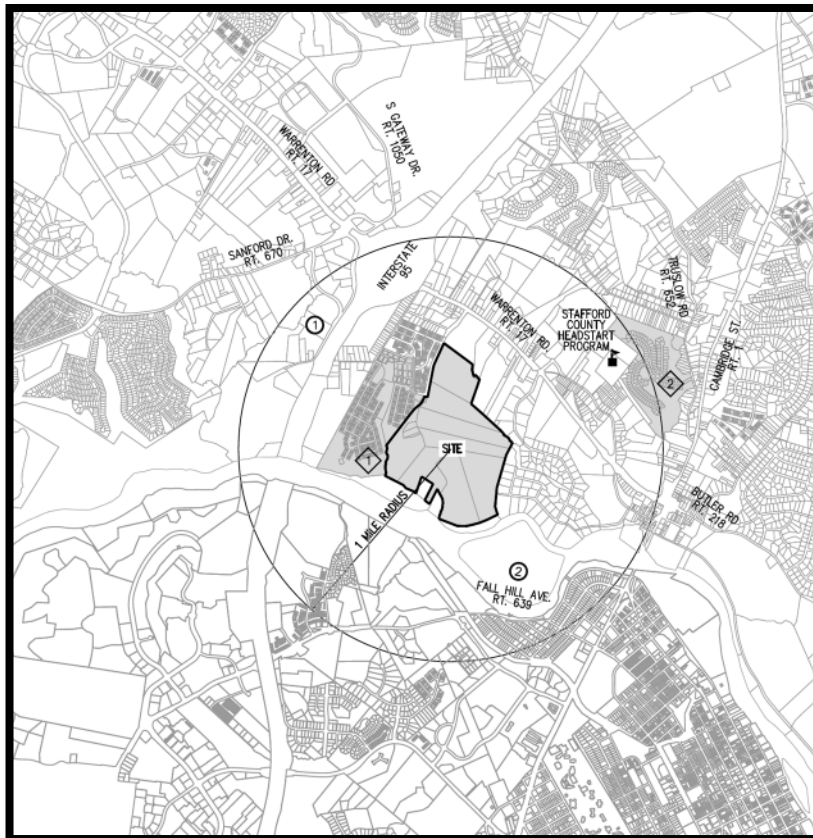
Comp Plan Amendment Request: Redesignate the Property and surrounding area, all as depicted on **Exhibit C**, from “Residential” to “Business and Industry” future land use area within the Falmouth Gateway Targeted Development Area Plan

File No.: RC _____
CUP _____
COMP _____

APPLICATION REQUEST

The Applicant hereby requests a rezoning of the Property from Urban Commercial (“B-2”) and Agricultural (“A-1”) to Heavy Industrial (“M-2”) in accordance with the Stafford County, Virginia (the “County”) Zoning Ordinance (“Code”), including without limitation Article III, Section 28-35, Article X, Section 28-161, et seq., and Article XII, Section 28-201, et seq., to permit the development of an industrial data center campus thereon. Further, relating to the proposed data center facilities, the Applicant also requests a conditional use permit (“CUP”) to allow the development of public facilities/utilities on the Property pursuant to County Code Section 28-185, et al. Finally, as discussed further herein, the Applicant is also requesting a Comp Plan (defined below) amendment to redesignate the Property and surrounding parcels to the business and industry future land use designation within the Falmouth Gateway Targeted Development Area, as depicted on **Exhibit C**.

The Property is comprised of eleven contiguous parcels consisting of approximately 181.336 acres of primarily undeveloped, wooded land within the George Washington voting district located to the east of Interstate-95 and to the south of Route 17 along Olde Forge Drive, all as more particularly depicted on the GDP, which is attached hereto and incorporated as a material part of this application by this reference. Note that the Property is transected by overhead power lines and a roadway known as “Blaisdell Lane”.



In support of this application, the Applicant provided a traffic impact analysis titled “Traffic Impact Analysis Blaisdell Property Data Center”, prepared by Bowman, dated December 9, 2024, and attached hereto as **Exhibit D** (the “TIA”). In summary, the TIA concludes that the Project is a low traffic generator with an estimated 135 vehicle trips in the AM peak hour (74 in, 61 out), 45 vehicle trips during the PM peak hour (13 in, 32 out), and 1,125 average vehicle trips during an average weekday (463 in, 562 out). Further, the TIA concludes that the existing transportation infrastructure is adequate to serve the Project, and no improvements thereto are warranted or recommended, all as discussed further below.

Additionally, the Applicant submitted a fiscal impact analysis titled “Stafford Data Center Campus Annual New Tax Revenue for Stafford County, Virginia”, prepared by Mangum Economics, dated December 3, 2024, and attached hereto as **Exhibit E** (the “FIA”). As discussed in more detail below, the Project is anticipated to create 159 new data center operational jobs at full buildout, and new County tax revenues from the Project are expected to rise from \$12.3 million during the first year of operations in 2028 to \$35.9 million in 2031 before leveling out in 2037 at \$32.0 million.

Also attached and marked collectively as **Exhibit F** are illustrative elevations titled “Trammell Crow Company Blaisdell Data Center 2D Elevations”, dated December 4, 2024, prepared by the Applicant, which depict the proposed architectural design and building material features for the Project (“Elevations”). Please note that the Elevations only describe the general architecture type, character, materials, and features of the proposed Project and final design and materials will be determined prior to construction.

Finally, note that the Applicant has submitted with this application a voluntary proffer statement (“Proffer Statement”) that, in relevant part, provides restrictions and conditions on the development of the proposed Project – including without limitation required open space, architecture and materials as well as utility standards, as more particularly provided therein.

OVERVIEW

The Property is currently zoned B-2 and A-1, neither of which permits the development of an industrial data center campus. Accordingly, the Applicant proposes the reclassification of the Property to M-2 to allow for the development of said proposed industrial data center campus.

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 [C]ounty 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 is encouraged. [. . . .] These districts should only be located where all necessary public utilities are available and where transportation systems are adequate.

In this regard, the proposed Project is anticipated to include no more than 1,480,500 square feet of data center facilities as well as accessory uses on approximately 181.336 acres, all of which will be organized in a campus, or park-like, manner – meeting the expectations for the M-2 district. Also note that the proposed floor area ratio for the Project is no more than .19 of the Property¹ and no less than 20% of the Property will also be preserved as open space², all as shown and noted on the GDP.

As briefly discussed above, the Property is generally located to the east of Interstate-95 and to the south of Route 17 along Olde Forge Drive with existing overhead electric lines and Blaisdell Lane transecting a portion thereof. More specifically, to the north of the Property is vacant land zoned B-2 and Holcim (a ready-mix concrete plant); to the south is the Rappahannock River; to the west is the Rappahannock Landing Community, single family detached and attached homes, commercial and industrial uses to include a Motel 6, Woof Houze, Car City, VDOT Falmouth Headquarters, Orkin, Pro Auto Repair, Shanks Tow Yard; and to the east is the Meadows of Falmouth mobile home park, Tires & Wheels Unlimited, Quarles Fleet Fueling, and Nationwide Motors. Accordingly, this Project is anticipated to serve as a complementary use to the existing and planned mix of uses in this area, as further discussed below.

Also as discussed further below, the Applicant's proposal conforms to the overarching policies established by the County's Comprehensive Plan, adopted on November 16, 2021, as revised ("Comp Plan"); however, the Project does not specifically conform with its future land use designation within the Falmouth Gateway Targeted Development Area ("Falmouth Gateway TDA"). Accordingly, the Applicant requests a Comp Plan amendment to redesignate not only the Property, but the commercial and industrial corridor to its north along Route 17, from a "residential" future land use to a "business and industry" future land use area, as discussed further below.

Finally, the Project will have minimal impacts on County public facilities like schools and parks and will generate new careers and significant positive commercial tax revenues at full build out.

COMP PLAN AMENDMENT

Currently, the Property is located within the County's Falmouth Gateway TDA, which is recommended to include 1,650 residential dwelling units, including 750 multi-family, 400 townhouse, 500 single-family units, and 1,000,000 square feet of business development.

¹ The M-2 Zoning District permits a floor area ratio of up to 1.0; accordingly, the Applicant's proposed floor area ratio is significantly lower and less intense than the standard M-2 regulations.

² The M-2 Zoning District only requires 25% of the Property be open space. Accordingly, the Applicant has elected to exceed the M-2 minimum requirements.

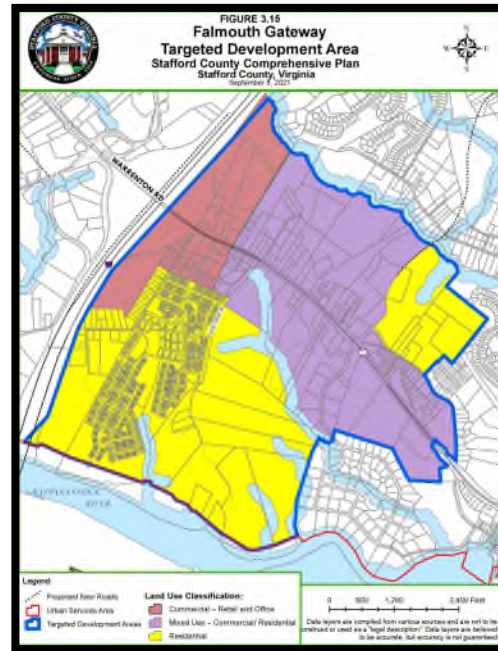


Figure 1: Existing Falmouth Gateway Plan

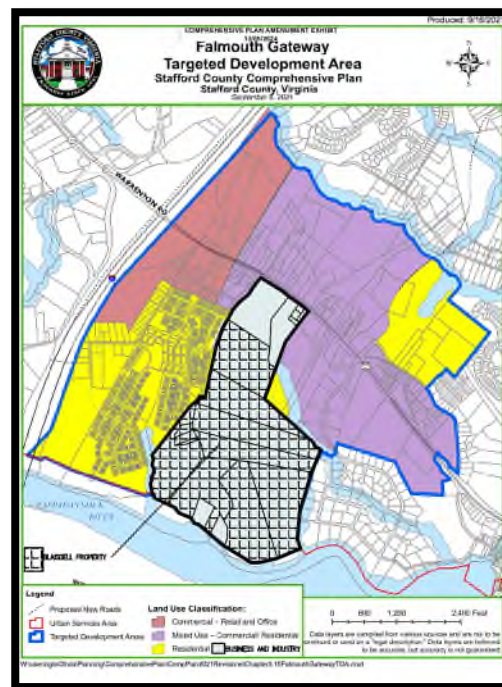


Figure 2: Proposed Amendment to the Falmouth Gateway Plan

In this regard, the Property's current future land use designation encourages intense residential development with some commercial development. The Comp Plan notes that in order to support development in this area, additional public facilities will be needed – notably including at least one new school. While the development of additional residential communities in the County is an important objective, we believe that the existing development pattern in this corridor does not

match the Comp Plan's future land use designation and, specifically, this Property's existing future land use designation is inconsistent with the highest and best use for the Property. Given the existing commercial and industrial corridor that extends to and along Route 17 and the Property's strategic location in proximity to the County's largest corridors, this proposed Comp Plan amendment request would permit the area to be developed for its highest and best uses while aligning with the community's actual development pattern.

The Comp Plan's near-term goal for this TDA emphasizes that its undeveloped land is "[s]een as an area where growth should be focused to support the businesses along the corridor." With much of the land proposed for this Comp Plan amendment being undeveloped and along U.S. Route 17, in proximity to Interstate-95, this area should be reconsidered and redesignated as business and industry to ensure that businesses – rather than residential uses – are supported along the County's major corridors. Note that the Falmouth Gateway TDA does not include any business and industry areas therein, as depicted above; however, notable issues with the development of this area relate to the need for increased tax generation for the expansion and construction of new public facilities like schools. The inclusion of this proposed business and industry area within this targeted development area would encourage a symbiotic balance of uses that aligns with the existing development pattern and encouragement of nonresidential uses along large transportation corridors.

In fact, the Comp Plan notes that this area currently consists of a variety of commercial and industrial uses that do not fit with the Falmouth Gateway TDA's long-term vision for the area. In this regard, the Comp Plan is materially inconsistent with the existing development pattern in this area. This Comp Plan amendment request would align with the existing uses in the area, and help realize additional, fiscally positive non-residential growth through encouraging the productive development of the Property with uses complementary to its valuable and strategic location near Route 17 and Interstate-95.

Additional factors in support of this Comp Plan amendment include:

1. *The contribution to the County's sustainable and positive growth.* This Falmouth Gateway TDA is anticipated to host significant, intense residential growth with an estimated 5,115 residents, creating the need for additional public facilities. Pursuant to the Comp Plan, in order to support this growth, the County will need to provide the equivalent of:
 - a. 61 acres for Parks and Recreation
 - b. 0.27 Fire and Rescue Stations
 - c. 0.42 Elementary Schools
 - d. 0.17 Middle Schools
 - e. 0.12 High Schools
 - f. 0.20 Libraries

The expansion and construction of new public facilities will be supported by the County and, largely, by developers in this area. In this regard, this Comp Plan amendment and related Project will significantly support the intended development of this corridor

(including those necessary public facilities) while aligning the Comp Plan with the existing development pattern of this area.

More specifically, new County tax revenues from the Project alone are expected to rise from \$12.3 million during the first year of operations in 2028 to \$35.9 million in 2031 before leveling out in 2037 to \$32.0 million. With these new tax revenues, the County will be able to better support the needs of this growing corridor.

Also note that this Project will include at least 20% open space (or approximately 36.2672 acres) and a trail connection to the existing river trail system along the Rappahannock River – providing additional parks and recreation activities to this area.

2. The location within the USA supports this amendment's approval.

The area requested for the Comp Plan amendment, including the Property, satisfies the County's goals for new development within USAs. Locating business and industry uses along major transportation corridors within the USA furthers the County's goal for locating new growth within the USA, supporting more compact development patterns within the USA, and reducing pressure on the rural parts of the County. Further, the commercial nature of this proposed future land use designation, job creation and positive tax revenues meets the County's goal for this area to be developed. For example, this Project, as a part of the overall Comp Plan amendment, is reasonably forecasted to create 159 new full-time jobs within the County and \$32.0 million in taxes annually by 2037, as further discussed below.

3. The promotion of the County's economic development.

Generally, the County has a goal of being fiscally sustainable with a 70/30 residential to non-residential development. This amendment to the Comp Plan, and the related Project, will significantly help support the non-residential development within the County while promoting the County's economic goals of job creation, retention, and growth.

Further, the Comp Plan generally 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 commercial and industrial locations within the USA.

This requested Comp Plan amendment and associated Project satisfy all of the aforementioned goals through:

- i. Attracting new business and industry into the area, thereby diversifying the County's economic base and promoting job creation.
- ii. Redesignating valuable land within the County to promote the development of non-residential uses within a strategic proximity to Route 17 and Interstate-95.

- iii. The non-residential nature of the business and industry future land use designation will attract users, like the Applicant, which will offset the demands on community facilities and infrastructure of surrounding residential communities and will provide economic revitalization in an area with significant swathes of vacant land.
- 4. *Domestic water use will be serviced by, or has reasonable access to, public water and sewer facilities.* The water and sewer mains appear to have adequate capacity, or the reasonable ability to be upgraded, to provide capacity for this Project.
- 5. *Located to the east of Interstate-95 and to the south of Route 17.* Larger data center campus users are seeking larger investments outside of busy urban hubs, but also desire to be near major road arteries and modern utility infrastructure.

The Applicant respectfully requests the redesignation of a portion of the Falmouth Gateway TDA, as shown on **Exhibit C**, to encourage the productive use of land along the County's major transportation corridors (namely, Route 17 and Interstate-95).

REZONING & CUP

Rezoning Overview. As noted above, the Property is currently zoned B-2 and A-1. The Applicant proposes a reclassification of the Property to M-2 to allow for the development of a data center campus. 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.

Most surrounding properties are developed for complementary commercial and industrial uses, with pockets of residential uses (e.g., Rappahannock Landing). The Applicant's proposal is not anticipated to change the character and established pattern of development in this area. Instead, this Project is expected to meet current market demands for industrial users and further complement and support the existing and future intended development pattern, as nearby existing uses include a variety of primarily commercial and industrial uses.

Further, this Project has been thoughtfully designed to limit any visual impact for its surrounding neighbors. In an effort to show these material efforts, the Applicant submitted viewshed renderings titled "Blaisdell Property | Viewshed Exhibits", prepared by Bowman, dated December 4, 2024, and attached hereto as **Exhibit G** ("Viewshed Renderings"). The Viewshed Renderings largely show that the Project (including the public facilities/utilities) will be hidden behind trees due to the mature vegetation and grades of the Property – The Applicant anticipates that there will be little-to-no visual impact on the surrounding parcels thereby further preserving the character and established pattern of development in the Project's vicinity.

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 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.

Further, as mentioned above, the Applicant's Viewshed Renderings largely depict that the Project (including public utilities/facilities) will not be materially visible to surrounding parcels.

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. Please see the Comp Plan amendment request described above.

VIRGINIA 15.2-2232 REVIEW

As a part of this Project, the Applicant is working with Dominion Energy to develop and construct one (1) +/- electrical substation pad consisting of approximately 6.77 acres, 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 the purposes of the 2232 review, the Property is within the County's USA. Given the developing infrastructure in this area and existing overhead power lines transecting the Property, the construction of one (1) +/- additional substation is not entirely out of character (the "Substation"). The Substation is strategically located on the Property to limit visual and audible impacts to surrounding properties (please see Viewshed Renderings). Further, the Substation will not generate traffic, nor does it add another access point onto the surrounding roads. Additionally, with consideration to its ample setbacks, buffering, and open space, the Project is in harmony with the scale, bulk, coverage, density, and character of the area. This area is largely intended for residential uses pursuant to the Comp Plan; however, the existing development pattern consists of a mix of industrial, commercial, 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 Substation will impair the value of surrounding properties or adjacent land/buildings, and they will be sited within a large data center campus where there will be adequate screening, setbacks and buffering all as shown on the GDP.

In summary, the proposed Substation is 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 along

an existing electric corridor, we believe that these public utility uses are substantially in accord (in conformance) with the County's Comp Plan.

TRANSPORTATION IMPACT ANALYSIS

In support of this application, the Applicant also submitted a traffic impact analysis titled "Traffic Impact Analysis Blaisdell Property Data Center", prepared by Bowman, dated December 9, 2024, and attached hereto as **Exhibit D** (the "TIA").

Access. As depicted on the GDP and noted in the TIA, the Project is anticipated to be accessed via one (1) full-access driveway connecting to Olde Forge Drive across from Ironcasting Road.

Scope of Work. The TIA scope of work for the Project was coordinated at a pre-scoping meeting with officials from the Virginia Department of Transportation ("VDOT") and the County on October 3, 2024. The purpose of the meeting was to discuss and agree upon major components of the TIA, including which intersections to study. The following intersections were determined to be the required scope:

1. Warrenton Road (Route 17) and I-95 Northbound Off-Ramp (Signalized);
2. Warrenton Road (Route 17) and I-95 Southbound Off-Ramp (Signalized);
3. Warrenton Road (Route 17) and Olde Forge Drive/RV Parkway (Signalized);
4. Warrenton Road (Route 17) and Lendall Lane/Solomon Drive (Signalized);
5. Cambridge Street (U.S. Route 1) and Warrenton Road (Route 17)/Butler Road (Signalized); and
6. Old Forge Drive and Ironcasting Road/Site Driveway (Unsignalized).

For the purposes of the TIA, it was anticipated that the Project will be constructed and fully operational by the year 2029. Therefore, the following scenarios were examined in the TIA:

1. Existing Conditions (2024);
2. Future Conditions (2029) without the Project ("No Build"); and
3. Future Conditions (2029) with the Project ("Build").

Programmed Improvements. The TIA accounted for the future roadway improvement planned by VDOT to realign the existing RV Parkway to make up the fourth leg of the existing Warrenton Road (Route 17) and Olde Forge Drive intersection. As a part of this planned improvement, it is anticipated that the traffic signal phasing will be revised to have the mainline (Route 17) left turn movements operate under protected/permissive left turn phasing via a flashing yellow arrow signal head.

Trip Generation. The Project is anticipated to generate 135 total trips (74 in and 61 out) during the morning peak hour, 45 total trips (13 in and 32 out) during the evening peak hour, and 1,125 total trips (563 in and 562 out) during an average weekday. Accordingly, this Project is anticipated to be a low traffic generator.

Capacity Analysis and Turn Lane Warrant Evaluation. The TIA examined all six intersections included in its scope – the analysis compared the results of the No Build conditions to the Build conditions to identify any areas impacted by the Project. The results of the capacity analysis indicate that the Project is not projected to adversely impact any intersection included within the TIA’s scope.

Further, the results of the auxiliary turn lane warrant analysis indicate that exclusive turn lanes from Olde Forge Drive into the Project’s site driveway are not warranted under Build conditions.

Conclusion. Based on the TIA, the addition of the Project’s traffic is not expected to adversely impact the traffic operations of the existing roadway network. No improvements are warranted or recommended.

PUBLIC FACILITY IMPACT ANALYSIS

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

Data center campuses generally place very few demands on public services. They create little traffic, and internally provide a high degree of security and fire suppression – thereby placing little demand on emergency services. Relative to other types of development, data center campuses have fewer employees, which mean less new indirect demand for new roads, schools, parks, and other public services than would be the case for a similarly sized retail or manufacturing development. Overall, data center campuses provide large, resilient revenue streams for local governments, while placing lower demands on local public services, all as discussed further below:

- A. Roads. As depicted on the GDP and noted in the TIA, the Project is anticipated to be accessed via one (1) full-access driveway connecting to Olde Forge Drive across from Ironcasting Road. The Project is anticipated to generate 135 total trips (74 in and 61 out) during the morning peak hour, 45 total trips (13 in and 32 out) during the evening peak hour, and 1,125 total trips (563 in and 562 out) during an average weekday. Accordingly, this Project is anticipated to be a low traffic generator.

Accordingly, the Project is anticipated to be a low traffic generator and is not anticipated to adversely impact the traffic operations of the existing roadway network.

1. By-Right Impacts. By right the parcels making up the Property could be developed for up to 48 single family detached homes and up to 652,833.72 square feet of commercial uses. Assuming maximum by-right development and a mix of commercial uses³, the Property could generate

³ Assuming a mix of 48 single family detached homes, 350,000 square feet of office; 150,000 square feet of medical/dental office; 50,000 square feet of convenience center; 50,000 square feet of Car Wash; and 50,000 square feet of restaurant.

826 vehicle trips during the AM peak hour (691 more trips than the Project), 1,398 vehicle trips during the PM peak hour (1,353 more trips than the Project), and 15,301 vehicle trips during an average weekday (14,176 more trips than the Project), all as seen below. The by-right development of this Project has the potential to be significantly more impactful to the area's existing transportation infrastructure – without any required proffered mitigation improvements or contributions.

Trip Generation Comparison									
Development	Weekday AM Peak Hour			Weekday PM Peak Hour			Average Weekday		
	In	Out	Total	In	Out	Total	In	Out	Total
Blaisdell Property Data Center	74	61	135	13	32	45	563	562	1,125
Blaisdell Property By-Right	665	161	826	486	912	1,398	7,657	7,644	15,301
NET INCREASE	+591	+100	+691	+473	+880	+1353	+7094	+7082	+14176

B. Utilities. As noted above, the proposed Project is located within the County's USA with access to public water and sewer facilities for its domestic water usage. Existing water and public sewer mains are available along Olde Forge Drive. Water and sewer will be used 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 in its sole discretion.

1. Public Water. The Property's domestic water requirements will be served by the existing water line along Olde Forge Drive.
2. Sewer. The existing public sewer line from Old Forge Drive will serve the Project.
3. By-Right Impacts. Any by-right development would likely have to connect to the same public water and sewer facilities.

C. Storm Water. Stormwater management will be provided in accordance with the requirements of the County's Stormwater Management Design Manual, the Virginia Stormwater Management Handbook, and all other relevant state and federal regulations. By-right development would be required to meet such requirements at site plan as well.

D. Schools. The proposed Project will not impact schools.

1. By-Right Impacts. By-right, portions of the Property could be developed for approximately 48 single-family detached homes, which would result in an estimated 21 additional students pursuant to the Comp Plan student generation factor. The by-right development of portions of the Property would not include any proffers to mitigate the material impact of introducing 21 new students into the County's public school system.

E. Recreational Facilities. The Project will not adversely impact recreational facilities. Instead, the Project will include approximately 36.2672 acres of open space and a public trail connecting to the existing trail system along the Rappahannock River.

1. By-Right Impacts. The by-right development of this Property would result in additional 150 residents pursuant to the Comp Plan's resident generation factor, which will use existing parks and recreation amenities within the County without any proffers to mitigate the community's impact thereupon.
2. *Fire and Rescue*. It is anticipated that the Project will be served by Station 12, which is located approximately 2 miles west of the Project. The Project will provide an emergency action plan therefor, as more particularly described in the Proffer Statement, and is not expected to impact current County capacity levels for fire and rescue.
3. *Fiscal Impact*. As mentioned above, the Applicant submitted an FIA with this application. For the purposes of the FIA, the Project is anticipated to come online between 2028 and 2031. It further estimates that the Project at full buildout and occupancy will create approximately 159 new data center operational jobs.

The Project is anticipated to cost approximately \$5.9 billion for its full construction, the construction and installation of the associated infrastructure, and the purchase and installation of the data center equipment housed inside. Of that total, \$3.5 billion would be for the data center (computer) equipment, and \$2.4 billion would be for the construction of the buildings and all of the fixed (non-data center) equipment.

The Project's first data center is anticipated to provide the County with an additional \$12.3 million in property tax revenue in 2028. Even after all of the data center business personal property is on a regular refresh cycle, and the County's depreciation schedule is fully applied, for the first data center alone, the County is anticipated to receive an additional \$10.7 million annually in tax revenue beginning in 2034.

Considering the whole Project, new County tax revenues from the Project are expected to rise from \$12.3 million during the first year of operations in 2028 to \$35.9 million in 2031 before leveling out in 2037 at \$32.0 million.

Estimates of Operational Jobs for the Trammell Crow Company Data Center Campus and Total New Annual Tax Revenue for Stafford County

Year	Total New Direct Operational Jobs	Total New Annual Tax Revenue Generated for Stafford County (in millions)
2028	53	\$12.3
2029	53	\$12.2
2030	106	\$24.5
2031	159	\$35.9
2032	159	\$35.3
2033	159	\$34.3
2034	159	\$33.1
2035	159	\$32.5
2036	159	\$32.1
2037 and after	159	\$32.0

The FIA notes that the reason that the annual tax revenue is so high, and remains so over the years, is that 20% of the data center personal property equipment is replaced with expensive new equipment every year. That means that the County will be taxing a large amount of expensive new equipment every year in data centers. In other types of businesses where equipment is replaced much less frequently, the annual tax revenue declines faster and for a longer period of time.

Also note that the assumptions used in the FIA for calculating the tax revenue have the effect of actually underestimating the actual tax revenue that the County would gain from the Project. For example, the value of the business personal property data center equipment is reasonably expected to increase over time due to inflation, and the FIA does not attempt to calculate business license revenue either.

4. *Environmental Impact.* This Project has been designed to minimize impacts to all RPA and wetlands present on the Property. Any unavoidable impacts to wetlands and other environmentally sensitive areas will be permitted prior to construction of the Project. Compliance with all relevant local, state, and federal regulations will be demonstrated with the final site plan.

Further, reviews of the Virginia Department of Wildlife Resources (“DWR”) and U.S. Fish and Wildlife Service (“USFWS”) Information Planning and Conservation (“IPaC”) online databases regarding Endangered and Threatened Species (“ETS”) were performed to determine the potential for occurrence of ETS on the Property. In relevant part, the DWR and USFWS IPaC searches indicate that there is potential for the following species:

1. Federally endangered dwarf Wedgemussel.
 - The Property is located directly north and adjacent to the Rappahannock River, which is designated as Threatened and Endangered (“T&E”) waters where this species has been previously observed.
2. Federally proposed threatened and state-threatened green floater mussel.

- The Property is located directly north and adjacent to the Rappahannock River, which is designated as T&E waters where this species has been previously observed.
3. Federal and state-threatened yellow lance mussel.
 - This mussel has been documented in the Potomac, Rappahannock, York, James, and Chowan River basins.
 4. Federal and state-endangered Atlantic sturgeon.
 - The spawning, migrating, and foraging habitat of this fish is not present within or directly adjacent to the Property; however, critical habitat has been published for it approximately 0.75-mile downstream.
 5. Federally endangered and state threatened northern long eared bat & federally proposed endangered and state endangered tricolored bat.
 - Due to presence of forest stands within the Property, there could be suitable summer-phase habitat within the Property.
 6. Bald eagle.
 - There is a bald eagle nest within the immediate vicinity of the Property. The buffers, however, do not extend into the Property. WSSI's field work did not indicate any nests; however, they did not perform an exhaustive survey.

In this regard, the Applicant is aware that additional searches and determinations may be required prior to any issuance of a wetlands permit, or waiver. If any ETS is present, the Applicant is also aware that additional measures may be required by federal and state agencies to avoid or minimize adverse impacts thereto.

Additionally, on August 12, 2024, ECS Mid-Atlantic, LLC ("ECS") completed a Phase I Environmental Site Assessment ("Phase I") attached hereto as **Exhibit H.1**. Pursuant to the Phase I, the following recognized environmental condition ("REC") was identified for the Property:

- A. A portion of the Property was formerly occupied by the Hunter Ironworks from approximately 1760 until at least 1782. Said portion of the Property remained occupied by various mills until 1822. The historical use of the Property as a forge, smelter, and tannery is considered to present an REC due to the potential presence of soils impacted with elevated concentrations of metals on said portion.

Following the Phase I, the Applicant elected to pursue a Phase II Environmental Site Assessment ("Phase II"), which is attached hereto as **Exhibit H.2**. The purpose of the Phase II was to collect soil samples for the purpose of assessing subsurface environmental conditions in the area of the former ironworks operations. On September 3, 2024, ECS collected eleven borings. Field screening did not indicate obvious evidence of impact in

the samples. Accordingly, the soils are unlikely to contain concentrations of any metals that pose an unacceptable risk for human health or the environment, and if excavated, would not require special handling or disposal. The former iron works activities have not adversely impacted the subsurface and are not anticipated to impact the safe development of this Property.

5. *Impact on Adjacent Properties.* Generally, nearby properties are a mix of industrial, commercial and residential uses, as well as vacant land. The proposed Project is compatible and will serve as a good transition between development on surrounding properties due to the nature of data center campuses (e.g., low traffic generators, shielded generators, large setbacks, preservation of open space). The Project is not anticipated to adversely impact neighboring parcels.

Please also note that the Applicant submitted Viewshed Renderings to confirm that the Project will not adversely impact the visual aspects of the surrounding area; further, the Applicant has proffered specific data center noise restrictions to ensure that potential audible impacts are sufficiently mitigated, as more particularly discussed in the Proffer Statement.

6. *Historical Sites.* Five previous cultural resources investigations were performed within the Property and its immediate vicinity, as summarized below:
 - A. In 1981, a Phase IA was conducted for the overhead power line corridor transecting the Property. One site, 44ST0061, was identified during this survey and is within the Property.
 - B. In 1994, the Embrey Dam located on the Rappahannock River was assessed, which is immediately south of the Property. The associated pedestrian reconnaissance survey relocated twenty-four previously identified sites and identified three new sites. Of these, seven (44ST0007, 44ST0061, 44ST0155, 44ST0156, and 44ST0241) are located within or immediately adjacent to the Property.
 - C. In 2000, the cultural resources in the vicinity of the Embrey Dam were assessed due to the planned breaching of the Embrey Dam. The study encompassed the entirety of the Property; however, no archeological field work was conducted during the study which looked only at previous documentation and current field conditions of the sites. A total of thirty-five sites were evaluated by this study, including five sites within the Property (44ST0007; 44ST0061, 44ST0155, 44ST0156, and 44ST0241). Additionally, the survey identified and evaluated an encampment which was designated at site 44ST0786 during a later survey.
 - D. In September 2005, a Phase I was conducted on most of the Property. A pedestrian reconnaissance survey was conducted to determine locations of low, moderate, and high archeological potential. In addition to two previously recorded sites (44ST0007 and 44ST0155), twenty-three new sites were recorded because of this

survey. Of the twenty-five sites, twenty (44ST00007, 44ST0155, and 44ST0776 through 44ST0793) are located within the Property.

- E. In October 2005, another Phase I was conducted adjacent to the Property, which discovered 44ST0156 immediately adjacent to the Property.

With respect to the above, a total of twelve historic sites have been recorded within the Property (please see GDP for depiction of the locations of each historical site). Of the twelve historic sites, only three sites have been determined to require preservation. *Please note that the Applicant does not anticipate any impacts to any site requiring preservation, as noted and depicted on the GDP.* If any additional sites are reasonably anticipated to be impacted by the development of this Project, the Applicant has agreed to perform a Phase I or II evaluation, as applicable, and follow its reasonable recommendations warranted thereunder.

CULTURAL RESOURCE SITES			
SITE #	Area	DESCRIPTION	RECOMENDATION
44ST7	N/A	HUNTER'S IRONWORKS, NRHP LISTED	PRESERVATION
44ST155	H	CIVIL WAR GUN EMPLACMNT	PRESERVATION
TB-4	B	LATE ARCHAIC TO EARLY WOODLAND CAMP WITH SMALL HISTORIC COMPONENT	PRESERVATION OR PHASE II EVALUATION
TI-6	I	PREHISTORIC CAMP AND EARLY - TO LATE 19TH CENTURY DOMESTIC SITE WITH DEPRESSION FEATURE	PRESERVATION OR PHASE II EVALUATION
TF-13	F	PREHISTORIC TEMPORARY RESOURCE PROCUREMENT CAMP	PRESERVATION OR PHASE II EVALUATION
TD-15	D	PREHISTORIC TEMPORARY RESOURCE PROCUREMENT CAMP	PRESERVATION OR PHASE II EVALUATION
TG-16	G	CIVIL WAR GUN EMPLACMNT	PRESERVATION
TG-17	G	LATE ARCHAIC TEMPORARY CAMP WITH SMALL HISTORIC COMPONENT	PRESERVATION OR PHASE II EVALUATION
TH-18	H	MIDDLE ARCHAIC TEMPORARY CAMP WITH SMALL HISTORIC COMPONENT	PRESERVATION OR PHASE II EVALUATION
TM-19	M	LATE 18TH TO EARLY 19TH CENTURY DOMESTIC SITE WITH POSSIBLE FOUNDATION AND SMALL PREHISTORIC	PRESERVATION OR PHASE II EVALUATION
TE-20	E	PREHISTORIC TEMPORARY RESOURCE PROCUREMENT CAMP	PRESERVATION OR PHASE II EVALUATION
TK-23	K	LATE 18TH TO EARLY 19TH CENTURY DOMESTIC SITE WITH SMALL PREHISTORIC COMPONENT	PRESERVATION OR PHASE II EVALUATION

7. *Exhibits:*

- A. List of Property Owners
- B. GDP
- C. Comp Plan Amendment Exhibit
- D. TIA
- E. FIA
- F. Elevations
- G. LOS Exhibit
- H. Environmental Surveys
 - 1. Phase I
 - 2. Phase II

EXHIBIT A

LIST OF PROPERTY OWNERS

<u>Owner</u>	<u>Parcel</u>
Nancy B. Harrison	53-1J
Vernon E. Blaisdell, Nancy B. Harrison, and Robert G. Blaisdell	53-1K
Beverly J. Blaisdell, Steve P. Blaisdell, Vernon E. Blaisdell, Nancy B. Harrison, and Robert G. Blaisdell	53-1M
Beverly J. Blaisdell and Steve P. Blaisdell	53-1N
Vernon E. Blaisdell, Nancy B. Harrison, and Robert G. Blaisdell	53-1P
Beverly J. Blaisdell, Trustee under the Beverly J. Blaisdell Revocable Trust Agreement	53-1R
Steve P. Blaisdell	53-1S
Nancy B. Harrison	53-1T
Nancy B. Harrison	53-1U
Vernon E. Blaisdell	53-1W
Robert G. Blaisdell	53-1V

EXHIBIT B

GDP

EXHIBIT C

COMP PLAN AMENDMENT EXHIBIT

Produced: 9/16/2021

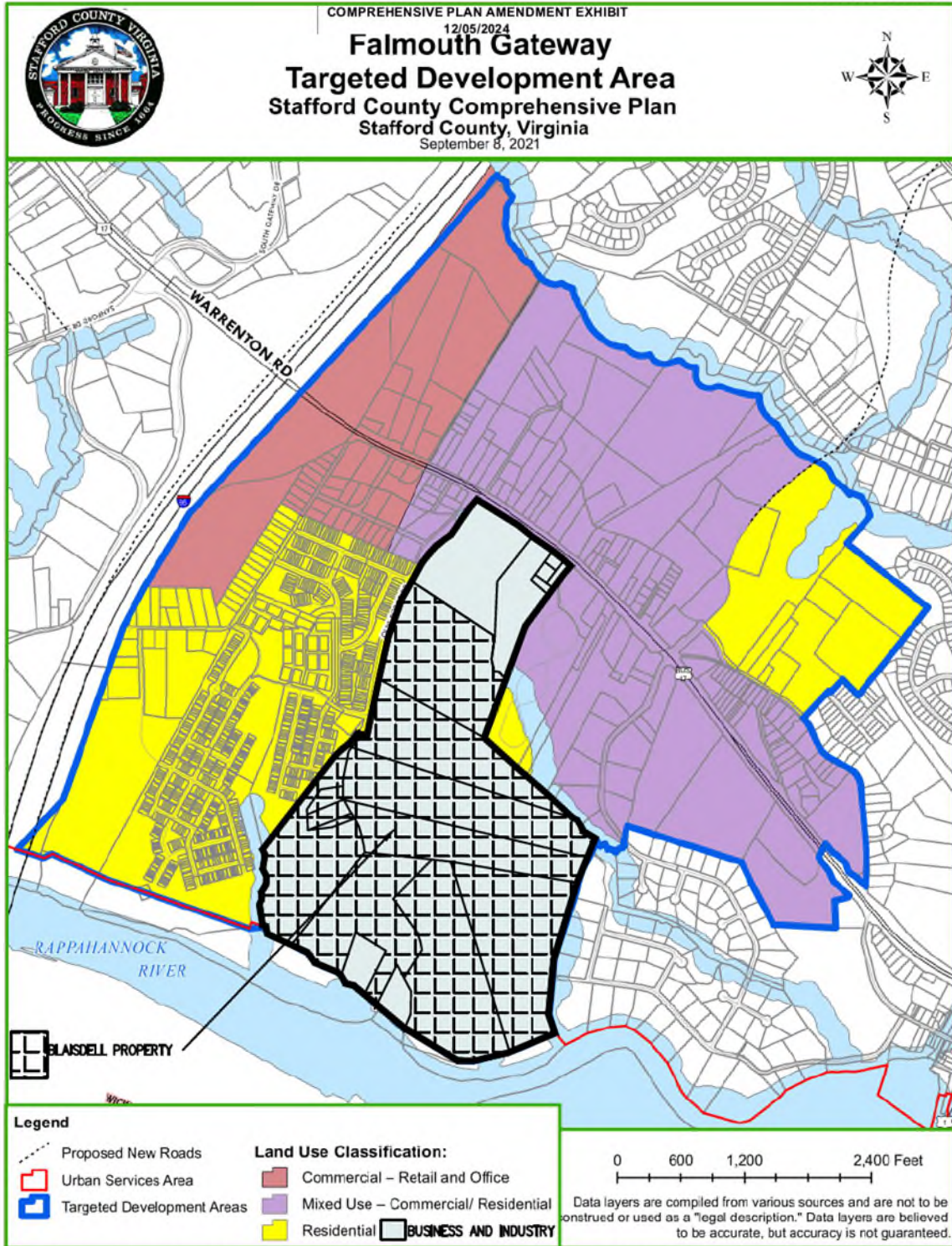


EXHIBIT D

TIA

EXHIBIT E

FIA

EXHIBIT F

ELEVATIONS

EXHIBIT G

LOS EXHIBIT

EXHIBIT H.1

PHASE I

EXHIBIT H.2

PHASE II

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