



DATE: September 14, 2026

TO: Fauquier Planning Commission, Board of Supervisors and Staff
RE: The Remington Innovation Campus: COMA-25-024819, REZN-25-024822.

Dear Honorable Planning Commissioners, Board of Supervisors and Staff:

Citizens for Fauquier County (CFFC)¹ respectfully submits these comments for your consideration of the property owners' application for a Comprehensive Plan (Comp Plan) Amendment, and Rezoning to develop the Remington Innovation Campus (RIC). These comments are based on Applicants' submissions and other information as of the above date, and may require amendment as more information is provided to the public.

CFFC unequivocally opposes this application for the following reasons:

- RIC's application is contrary to Fauquier's Comp Plan and Ordinances;
- RIC's application is contrary to the Remington and Bealeton Service District Plans;
- RIC's application is contrary to Fauquier's Policy on Data Center Development (DC Policy) that should be incorporated with Fauquier's Comp Plan and ordinances, together with noise and decommissioning rules for data centers;
- RIC's data center is fiscally unnecessary because Remington Technology Park (RTP), is an already approved data center in the Business Park that is being built and will provide considerable tax revenues to Fauquier County; and,
- RIC's Data center will generate excessive water, noise, air and light pollution, harming residents' health, welfare and safety.

SUMMARY

Remington already has an approved data center project, the RTP, that will bring copious tax revenues to Fauquier and also Remington. More data centers in the Remington area are contrary to the public good, Fauquier's Comprehensive Plan, and DC Policy. This application for a Comp Plan amendment and rezoning should not replace a full, public review of Fauquier's Comp Plan, that includes the Remington Service District Plan.

CFFC opposes any such Comp Plan amendments, rezoning and special exception requests by data center developers because their consequences are enormous in terms of their impact on the surrounding community, on Fauquier's incomparably beautiful countryside, on our aquifers, clean air, and energy production, on Virginia's electricity ratepayers, and on our rural, historic, and agricultural county. Rezoning from Rural Agriculture to a Business Park could set an irreversible precedent with sweeping consequences for the County.

Development of the RIC would set a terrible precedent, for it would extend Remington's Service District Plan for a limited Business Park (BP), which permits data centers, to encompass a Rural Agricultural (RA) zoned area outside the Service District that for years has enjoyed the lowest real estate tax rates in Fauquier and access to subsidies intended to promote agriculture. If approved, any and all rural agricultural farms in Fauquier would be encouraged to pursue

¹ CFFC is Fauquier's oldest conservation **nonprofit** representing thousands of residents throughout the County in order to protect and preserve Fauquier's rural, agricultural and historic heritage.

development as data centers, devastating the rural, agricultural, and historic character of Fauquier.

In addition, the Service District Plan calls for development that is consistent with the surrounding livable, walkable, historic community. Residents of Remington have been developing a plan for heritage tourism that would best serve the unique characteristics of this community. Speculative, unplanned, unnecessary, and incomplete data center applications would upend years of planning for the future of Remington and Fauquier.

Fauquier's DC Policy is an initial attempt to set standards for sustainable data centers that this application does not address or meet. Before data center applications that require Comp Plan amendments and rezoning are approved, Fauquier's Comp Plan, DC Policy and ordinances need to be updated to address data centers' unique challenges, especially regarding water, noise, air, and light pollution, as well as decommissioning requirements.

Legislators in Virginia's General Assembly have introduced bills to implement "Four Pillars" regulating data centers to: 1. ensure that residents' do not pay for data centers' share of electric infrastructure; 2. ensure transparency in data centers' use of water, energy, and environmental impacts; 3. ensure appropriate siting only in industrial areas; and, 4. incentivize energy efficiency with use of Tier 4 or better generators, and more renewable energy. Fauquier should require no less for its residents.

This application for data centers could generate excessive water, as shown on CFFC's hydrology mapping, that will exacerbate flooding in the town of Remington and in Bealeton, while noise generated by the HVAC systems, servers, and generators likely will exceed Fauquier's existing noise ordinance, generators and fossil fuel sourced electricity will pollute Fauquier's pristine air, and light emanating from towering buildings will cast a glow over Fauquier's dark skies that will disturb the sleep of residents and animals alike.

CFFC unequivocally opposes this application due to its infringement on the health, welfare and safety of Remington, Bealeton, and Fauquier residents.²

RIC PROJECT DESCRIPTION

RIC has applied for an amendment to the Comp Plan and to rezone approximately 181.9 acres from RA to BP, stating that it will also dedicate approximately 28.8 acres from RA to RA with Proffers for a park or other recreational uses on the property. Applicant intends to develop a maximum of 2,221,860 million square feet of gross floor area into data center space, i.e., over 2.2 million square feet of gross impermeable surfaces, plus other impermeable surfaces for driveways, parking spaces and accessory uses. Proffer at 1 and II. A. at 2. These accessory uses could include **generators, fuel cells, batteries**, chillers, transformers, and water treatment systems, etc., reviewed and approved solely by the Zoning Administrator (not the BOS). In addition, the property may be developed under a separate special exception for up to **three** electrical substations, screened with a 20 foot wall. Proffer II. B. at 2.

The data center would be comprised of 2 to 6 buildings, with Buildings 1-4 being up to 65 feet tall, with an additional maximum 12 foot tall parapet or screen wall on top of the data center buildings, for a total maximum of 77 feet high. Buildings 5 and 6 would be up to 35 feet tall, with

² RIC has proffered voluntary cash contributions, amounting to almost \$7.5 million, that county counsel should ensure comport with state law, as some appear to curry favor rather than be related and proportionate to consequences of the development. Proffer VI-VIII at 12-14.

up to 10 feet of addition parapet or screen walls for up to a total height of 45 feet. Proffer III.C. at 4.

The project could require up to 900 MW of electricity, based on the three proffered substations located on the RIC property. See Proffer II.B. at 2.

Remington Road, Lucky Hill Road, Schoolhouse Road, and Catlett Road would be impacted by this development. Proffer IV at 8-9. There are twin 180 foot transmission lines on towers that bisect the property. Wetlands and ponds are included on the property. The property is in the Lee Magisterial District, outside the Remington Service District. See Proffer II.B. at 1.

THE RIC PROJECT IS CONTRARY TO FAUQUIER'S COMPREHENSIVE PLAN AND ORDINANCES

"The Fauquier County [Comprehensive Plan](#) guides development within the County to promote, preserve and protect the health, safety and general welfare of its citizens." An applicant for an amendment to the Comp Plan must demonstrate that any change in land use designation or density/intensity:

- would benefit the public health³, safety and welfare;
- is consistent with the Goals, Objectives, and Policies of the Comprehensive Plan and appropriate Service District, if applicable;
- will not be detrimental to uses of property in the immediate vicinity of the subject property;
- has merit and value for the community as a whole; and
- will result in benefits (fiscal, aesthetic, employment, etc.) that will outweigh any significant impact of the change.

See Comp Plan at 5.

RIC fails to satisfy these requirements.

CFFC is not against all data centers and recognizes their industrial utility in today's world. It has not opposed any appropriately sited data centers in Fauquier, including the Remington Technology Park. That is because Fauquier adopted ordinances that astutely determined the

³ Shaolei Ren, UC Riverside, and colleagues have written on the economic and human costs of diseases directly linked to pollution associated with data centers. The primary issues stem from toxic gases, such as nitric oxide and PM2.5 particles, released during the electricity generation process that powers these facilities. These pollutants come from both the power plants, typically located just a few miles from the data centers, and from the backup generators used when the primary power supply is interrupted. Data centers are neither more nor less polluting than other industries. The difference, according to Ren, is the rapid growth of the sector and the apparent lack of awareness about the pollution it generates. *"It is well known that cars pollute, and, precisely for that reason, there are strict regulations to control and reduce the gases they emit. But data centers are growing at such a dizzying rate that by 2028 they will exceed the emissions of the entire California vehicle fleet — even if we add 35 million vehicles — according to the Department of Energy's recent projection of data center energy demand."* Communications of the ACM. Health-Informed Computing: Estimating and Addressing the Health Impact of Data Centers, June 8, 2026, [arXiv:2412.06288 \[cs.CY\]](#).

best locations for data centers in the County to be in the Remington Business Park (BP) and the Planned Commercial Industrial Development (PCID) in Vint Hill. See Fauquier Zoning Ordinances 3-200 12., 3-316 4., 3-400 fn. 25, and 4-603. Although there are other Service Districts that include industrial zoned areas, none of the other Service Districts, including Marshall, The Plains, Upperville, Opal, Bealeton and Catlett, as well as the remainder of Remington's Service District, include a Business Park zoned for data centers — for good reason.

In particular, data centers need considerable electric power from high voltage transmission lines and substations. Thus, Fauquier designated the Remington BP and the Vint Hill PCID for data center development as these two areas are near high voltage transmission lines and do not take prime agricultural or residential land.⁴ These two areas have yet to be fully built with data centers, although the RTP is approved and under construction in Remington, and one operating, with three or more proposed to be developed, in the Vint Hill PCID.

Data centers also require considerable amounts of water. Fauquier's ordinance requires that data centers use **recycled water** to ensure our aquifers are not drained and remain accessible for our residents' and local businesses' usage with regularity and reliability, even during times of drought. Even trucked in water is required to be recycled water to ensure our regional aquifers are not drained. **RIC must use recycled water for the data center's cooling systems, but it has not proffered exclusively to do so, allowing for "recycled or water obtained from outside Fauquier County" for its closed loop cooling systems. See Proffer II.A. at 2. This alternative source for water must not be approved.**

The possibility of tax revenues from data centers is alluring. However, if Fauquier's existing and by-right data centers are built and operating, it is estimated that more than \$100 million in tax revenues could be obtained each year without creating or expanding more BPs. See Exhibit A. Once fully operating, the approved RTP alone could generate \$55 million or more each year in tax revenues. These total tax revenues would be equal to approximately 25% of the County's currently balanced budget that has earned it a top bond rating. Thus, there is no need for more data center tax revenues.⁵

The County has yet to determine how much data center revenue it needs in the future, how or where such revenue would be spent, and just how dependent it should be on a single industry that could evaporate quickly given the pace of technological Innovation. More data center tax income will encourage more county capital expenditures, as in Loudoun and Prince William County, that ultimately require maintenance which the County may not be able to afford after the data center boom ends, while doing little to mitigate residents' property taxes. Thus, there is no need to rezone any more of Remington's Service District as a Business Park.

⁴ As the Virginia Farm Bureau has noted, Fauquier is 4th among Virginia counties in terms of farmland acreage, although it is 8th in terms of square miles. Hence, our community development efforts should to be focused on preserving our farmlands and their related commercial and industrial businesses.

⁵ The Fauquier Ordinance provides for a technology business tax rebate that could considerably compromise the anticipated tax revenues from new data centers for at least the first five years of operation. See Fauquier County, Virginia - Code of Ordinances Chapter 8 - FINANCE AND TAXATION ARTICLE XIX. - BUSINESS ZONES—TA. The prospect or proffer of copious tax revenues must be measured against such possible rebates.

To date, Fauquier County has not approved data centers outside the existing Remington BP and Vint Hill PCID. This is wise because high voltage transmission lines and substations required by data centers for electricity are not only unsightly and require considerable taking of land for rights of way, but also are paid for by all rate payers, not just the data centers they primarily service, unless otherwise established by the State Corporation Commission (SCC). Notably, PJM, the grid operator for this region, has publicly stated that the transmission lines running through Remington are “overloaded” so the proposed data centers necessarily will require additional electric transmission lines and substation infrastructure. See Exhibit B.

This RIC Project proposes to use up to three new substations located on the property, with underground connections to existing transmission lines, but there is no evidence that the electric capacity exists for such use by RIC, nor that RIC or other data centers will pay for all new capital improvements like the new substations or upgraded transmission lines, rather than residential and small business ratepayers. Existing transmission lines and substations likely will have to be supplemented, given data centers’ enormous appetite for energy throughout the region. **Any new transmission lines needed to service the data centers will require taking approximately 24 acres per running mile for new rights of way, intruding on rural and residential properties alike.**⁶ Thus, CFFC strongly opposes such an unplanned, unsightly and expensive imposition on all ratepayers and residents, not just RIC.

The source of sufficient energy for all the data centers proposed in the BP and PCID, as well as noise near residential areas, greatly concerns CFFC and should be addressed by the County. Fauquier currently uses approximately 120 MW of electricity, while RIC alone proposes using up to 900 MW – more than seven times Fauquier’s existing usage. See findenergy.com and RIC Statement of Justification at 7, “Power Supply.” Dominion currently expects approved data centers to wait over five years, possibly up to ten or more years, for delivery of electricity to contracted data centers. Adding to this backlog will only encourage more electric infrastructure development, while already approved and built “zombie” data centers lie in wait to operate when they obtain the necessary electricity.

In addition, more data centers than the County originally intended will detract from other commercial, industrial and residential development that could bring more jobs and uses that are compatible with our rural, agricultural and historic heritage. Data centers discourage other development while creating a locked-up, commercial desert, as witnessed in Loudoun’s data center alleys. Our community development efforts should focus on businesses compatible with Remington’s historic and agricultural character, while expanding its commercial recreational opportunities, not more data centers. Remington needs recreation oriented businesses and facilities, residences, small businesses, and heritage tourism, as planned, not more data centers.

Such large energy consuming and polluting development should be planned, not reacted to at the request of developers who will reap the profits, but not the problems that data centers can generate. Good planning begets good results—Fauquier should stick to its existing plan for data centers. Accordingly, CFFC is unwaveringly opposed to Comp Plan amendments, rezoning and special exceptions for unplanned data centers.

⁶ Typical 200 foot transmission line right of way multiplied by 5280 feet per mile divided by 43,560 square feet per acre equals 24.24 acres.

THE RIC PROJECT IS CONTRARY TO REMINGTON'S SERVICE DISTRICT PLAN

That the RIC Project is totally inconsistent with the 2017 Remington Service District Plan that is part of the Comp Plan is an understatement. The Remington Service District is within an historic area that encompasses two significant Civil War battlefields, the Rappahannock I and II Battlefields, the Journey Through Hallowed Ground along James Madison Highway, and other historic attributes in the Town of Remington.⁷ The Service District is envisioned as a "people friendly" area with walkable neighborhoods connecting a network of parks open to the public and based on the floodplains of Tinpot Run and the Rappahannock River. See Comp Plan, Remington Service District at 32-3.

Nothing could be more different from this vision than a closed data center campus, akin to a maximum-security prison complex, but with fewer jobs and no amenities for residents. If the Comp Plan and Service District are to be amended, it should not be at the behest of developers, but rather at the behest of a thorough public process that takes into consideration the historic and natural attributes of Remington and Fauquier as a whole, and the impact of more data centers.

Remington's Community Partnership has worked long and hard to preserve the Town of Remington and the surrounding area. Remington's proximity to the Rappahannock River and historic battlefields provides a unique opportunity to develop a public/private recreation area similar to those elsewhere in this country. Envision an area where history and recreation merge, with a river park that provides for rafting, paddle-boarding, fishing and boating, with walking,

⁷ It should be noted that along with the easements described below, there are nearby Historic Districts as noted on the Remington Community Partnership website:

"The Hedgeman-Rappahannock Rural Historic District (DHR ID# 030-5607) is centered on the Rappahannock River. It extends from around Waterloo and U.S. Rt. 211 southeast to the waterway's confluence with the River and generally covers one half-mile from the centerline of the river, incorporating acreage in Culpeper, Stafford, and Fauquier Counties. The district boundaries encompass the cultural landscape directly related to the river, including prominent rural and urban features within the view shed. All attempts were made to exclude concentrations of non-contributing resources, such as recent residential and industrial development along the proposed district's edges.

The district overlaps with rural estates, working agricultural enterprises, and urban properties within the historic town of Remington, and concentrations of historically-related buildings in smaller hamlets and villages. It also contains within its bounds significant portions of publicly owned lands, in particular the C.F. Phelps Wildlife Management Area. There are few recent intrusions that upset the dramatic, historic view sheds visible from the river valley and its adjoining lands. The district contains portions of several other historic districts, including the register-listed Remington Historic District (288-5001) and Rappahannock Navigation System (Canal) Historic District (111-0134) plus the register-eligible Springs Valley (030-5427) and Mt. Holly Ridge-Marsh Run Rural Historic District (030-5587). Citizens for Fauquier County and the Remington Community Partnership partnered together to produce the nomination for the Hedgeman-Rappahannock Rural Historic District, which was deemed eligible by the Department of Historic Resources in 2015." See Remington Community Partnership: www.RemingtonVA.com.

hiking and biking trails alongside the river and throughout the battlefields. Some residences, built in a style that complements Remington's historic character, could augment commercial breweries, wineries, restaurants, professional offices, shops and parks that will enliven Remington and attract tourism that will lift-up the community. This is the type of development Remington and Fauquier should seek. It has been done and can be done.⁸

In addition to cultural and historic resources, there are many conservation resources located near the RIC project that warrant protection. Private residents and the county, state, and federal governments have all made significant investments in land conservation in the Remington area. There about 135 permanent easements that are held by various land trusts and Fauquier County within five miles of the data center projects. The majority of these easements are in the Purchase of Development Rights (PDR) program financed by the County. See Exhibit C.

Another 90 properties totaling over 5800 acres, anchor the Fauquier Agroforestral District (AFD) within that same five-mile distance. While there is some overlap in these program properties, these two conservation programs together total over 12,000 acres and represent an enormous investment in conservation and open space. These conservation interests will be poorly served by the RIC Project, putting pressure on land valuation, impeding view sheds, and imposing floods, noise and air pollution. The unforeseen impacts on land valuation, water displacement and pollution caused by the data center "boom" must be better understood prior to any rezoning. See Exhibit C.

The Town of Remington is the anchor of the Remington Service District, although it is not in the Service District itself. The security requirements for the proposed, extremely large and tall (65'+) data center buildings are antithetical to the Remington Service District Plan's concept for an integrated village sensibility. Sidewalks and nature trails within the industrial area will be absent. The public will be locked out and excluded at security checkpoints, while the buildings will loom over Remington, drawing enormous amounts of energy and emitting noise and air pollution from their cooling equipment, servers and hundreds of fossil-fuel generators. At night, the security lighting will cause the locked RIC project to rise like Oz over the Town of Remington, warning residents and animals alike to stay away, alert, and awake. During increasingly copious rainstorms, flooding of Remington could increase as water could cascade over millions of square feet of new, impermeable surfaces into the town, deluging the already flood prone watershed.

The RIC project is not the clean, low impact complement to the village scale of Remington at the southwestern gateway to Fauquier County that the Remington Service District Plan contemplated. The famous Journey Through Hallowed Ground view shed along James Madison Highway, the western gateway to Remington, will be imperiled by the gigantic, tall, industrial data centers, regardless of buffers and setbacks. Nor will this data center project respect the historic, hallowed Rappahannock battlefields that will be destroyed irreparably for private purposes and exclude heritage tourism. Several more large data center buildings, with hundreds of generators, simply are not compatible with Remington. Remington will have sufficient data center development with the already approved RTP.

Approval of this Comp Plan amendment and rezoning application would establish a precedent that would make it difficult not to approve the other data center projects that will be encouraged

⁸ See boaterparks.com that lists projects where rivers have been developed for public recreation.

in rural agricultural lands in Fauquier. The “synergy” between the approved RTP and other data center proposals, including RIC’s project, is a troubling rationale that will lead to even more data center applications. Where and when does such “synergy” end? Notably, RIC didn’t apply for rezoning to a BP until after the RTP was approved, and other data center projects were proposed—a clear example of the “ripple effect” of rezoning for data centers.

The Remington Service District Plan was updated as recently as December 14, 2017 when the existence of data centers were a known industrial use, and then the RTP was approved in 2018. That should be final for Remington data centers, unless and until there is a full comprehensive review of Fauquier’s Comp Plan as a whole. In addition, The Vint Hill PCID has demonstrated how difficult it may be to limit the number of data center proposals to expand the BP once one is approved. Once one residential or agricultural area is rezoned to BP, other landowners will be encouraged to request rezoning consideration. See Exhibit B.

Data centers bring tax revenues, as well as many unintended negative consequences. The tax revenues will go to the entire County, not just Remington. Data Centers won’t keep local businesses, like restaurants, shops, etc. open. People will. Rezoning from RA to BP for data centers will not bring more people to support Remington businesses or public parks and facilities. Much data center employment can be done remotely (to monitor the servers, etc.), so they will not include as many employees as local businesses can attract instead.

The 2017 Remington Service District Plan, which is part of the Comprehensive Plan, seeks a balance among industries, e.g., the approved, and now being built RTP, commercial businesses, e.g., shops, small trade and retail businesses, restaurants, cafes, and professional services, residences, parks and agricultural land. In terms of public services that new residents would require, the Remington Service District Plan calls for phased residential building: “in a manner commensurate with application scale and the capacity of schools and other public infrastructure needed to support the new neighborhoods.” Data centers should not dominate the Service District at residents’ expense. **STICK WITH THE PLAN AND CURRENT ZONING. DO NOT REACT TO SPECULATIVE DEVELOPERS’ EFFORTS TO PROFIT AT RESIDENTS’ EXPENSE.** See 2017 Remington Service District Plan at page 12.

THE RIC PROJECT IS CONTRARY TO FAUQUIER’S DATA CENTER POLICY

The RIC project largely ignores Fauquier County’s new Data Center Development Policy (DC Policy) that the Board of Supervisors adopted on December 14, 2023. Perhaps this is because the RIC project simply cannot or will not comply with the DC Policy. The policy states: “Applicant sponsored Comprehensive Plan amendments, which expand a Service District or change the Land Use designation within a Service District are not appropriate....The Data Center use should not be expanded to other zoning districts without a comprehensive review of the County’s Comprehensive Plan and Zoning Ordinance.” DC Policy at I.A. a. and 3. The entire Remington Service district is not a Business Park and data centers are not a designated land use in the project area. Only a comprehensive, public review of Fauquier’s Comp Plan should initiate consideration of such an impactful rezoning.

Siting. Again, DC Policy states that “Data centers should be where existing infrastructure exists to support the development....” DC Policy 1.B. While RIC proffers under-grounding electric lines to the nearest transmission line, as required by Fauquier’s ordinance, it also requires up to three new substations. These substations will only be built at considerable cost to all ratepayers, not

just the data centers operators. There is no written, public proof that RIC and/or other data centers, and not residential and other commercial ratepayers, will pay for the building of these necessary electric substations, or that more transmission lines/upgrades necessitated by this RIC project will be paid for by RIC and not all ratepayers.⁹

The DC Policy also states that data centers and their associated energy infrastructure should not disturb or interrupt scenic view sheds, as defined in the Comp Plan, or view sheds of properties listed in the National Register of Historic Places, e.g., the Remington Battlegrounds that are eligible for such designation,...nor be located along National Scenic Byways or Virginia Scenic Byways. DC Policy at 2, C.3. If approved, this RIC project will be built near James Madison Highway that is part of the Journey Through Hallowed Ground. See www.hallowedground.org. Instead of historic vistas, travelers will see tall, industrial buildings and a campus that is closed to the community and heritage tourism, brightly lit at night, and leading to more data centers that crowd out other forms of desirable development with more potential benefit to the community. The RIC project simply is not compatible in scale and intensity to the surrounding area and should be rejected.

Site Sustainability. The DC Policy calls for a setback of 35 feet from all waterbodies, wetlands, and floodplains, while a vegetated riparian buffer of at least 25 feet is strongly encouraged along all water bodies, wetlands and floodplains. DC Policy at 4, E. 5 and 6.¹⁰ However, on the site plans, it appears that the RIC buildings will be located near or on top of floodplains that feed the storm water management ponds and the Rappahannock River. Rainwater overflows during downpours frequently have flooded the Remington area, isolating residents. See Exhibit D. **CFFC urges the County to require the Applicant to fund an independent, third party storm water management study to determine how the addition of over 2.2 million square feet of impervious surfaces, including parking and internal roadways, will affect the surrounding area during torrential rainfalls that have become more frequent in recent years.**

The appropriate riparian buffers and setbacks do not appear to be included in the RIC project, and the siting of buildings near or over floodplains could lead to disastrous displacement of water in an area already prone to flooding. It is imperative that a storm water management plan detail exactly how overflows will operate **in the future**, together with the considerable run-off from the impervious surfaces of the 2 to 6 huge data center buildings, with over 2.2 million square feet of impervious surfaces, including generators, impermeable driveways and parking spaces, to avoid contributing to future flooding.

Building Design. DC Policy states that data centers should be compatible in scale, both size and height, and intensity to the surrounding area; building heights “shall not be increased above the 45-foot maximum, unless the Applicant can demonstrate that the proposed height is compatible with the surrounding development and that it will not have an adverse impact on

⁹ Note that PJM, the regional grid operator, has stated that the existing transmission lines around Remington are “overloaded.” Approving more data centers will require adding capacity to existing or new transmission lines, as well as substations both inside and outside data center properties. See Exhibit B, PJM slide, 12/24. As noted above, any new transmission lines needed to service the data centers will require taking approximately 24 acres per running mile for new rights of way, intruding on rural and residential properties alike.

¹⁰ Fauquier’s John Marshall Soil and Water District typically requires a minimum of 35 or more feet on each side of a run, wetland or waterbody when planting riparian buffers.

adjacent and nearby properties.” DC Policy at 2 & 4, 1.C & III. B. A visual impact analysis needs to be submitted that is verified, at Applicant’s expense. Id.

While site renderings can prettify the data center campus, they cannot hide the fact that the data centers are far and away not in scale with the towns of Remington and Bealeton, and the surrounding area. The proposed 65 foot data centers, plus an additional 12 feet for rooftop fencing and walls, will loom over the area, totally overwhelming the character of the area and announce an unsustainable industrial taking of southern Fauquier County. This closed, industrial complex is antithetical to Remington, Bealeton, and Fauquier.

Noise. DC Policy requires site plans to demonstrate how Fauquier’s ordinance for noise limits will be met and strongly encourages Rezoning applications to provide the same level of documentation. PC Policy at 6, C and F.1 (emphasis added). DC Policy specifies that the noise study should be prepared and certified by a professional noise engineer, verified by a third party at Applicant’s expense, factor in all data center related equipment, including generators or other equipment, and update and resubmit the noise study within 30 days of occupancy. Id. ¹¹

RIC’s application fails to provide any demonstration of how it will meet Fauquier’s noise ordinance. There is no noise study with the rezoning application to demonstrate its commitment to noise compliance. Instead, RIC proffers pre and post occupancy sound studies with possible mitigation measures and no apparent deadline for compliance. A post occupancy noise study shall be performed one to two years after the first occupancy permit for each data center building is issued. See Proffer III.M-N at 7.

These noise and testing proffers are inadequate. Data centers emit noise from air-cooling systems, servers, and generators, whether being tested or used for emergencies, along with constant humming vibrations from the operation of servers within the buildings. Given the specifications for the air-cooling equipment, servers, and generators, desk-top software can demonstrate the cumulative noise levels at various distances from the RIC property line. Surely, RIC has some knowledge of the specifications for all the equipment, including generators, that will be used and should submit a third-party certified noise study demonstrating the entire RIC project’s compliance. Simply stating that it will comply, after operations have commenced, based on unsubstantiated and limited testing, is totally inadequate.

In addition, according to USDOT (Modeled combined railroad, road, and aviation noise, 2020 version) road noise along Rt 15/29 adjacent to the RIC site already reaches 75 dBA, which exceeds the Fauquier County Noise Standard (65 dB(A) during rush hour. That same source also indicates that rail traffic on the Norfolk Southern line intermittently generates 65 to 85 dBA in the area adjacent to the RIC site.

¹¹ CFFC is greatly concerned about the inadequacy of Fauquier’s noise ordinance as applied to data centers. For instance, Fauquier’s noise ordinance exempts air conditioning equipment and generators from its noise ordinance. See Sec. 13.5-4. - Exemptions at (12) and (13). These are the very sources of much of the data center noise that is harmful to the health and welfare of residents. The ordinance also fails to address the constant vibrations emanating from the servers within the data centers. A new noise ordinance that takes into account the scale of data centers, their equipment and the cumulative impact of noise and vibrations is warranted prior to any rezoning or approvals of data centers in Fauquier.

RTP will have its own, thus far unspecified, noise level, meaning the residents will be subjected to an enormous cumulation of noise and vibration between just these two facilities. While the Fauquier Noise ordinance requires that RIC only meet the noise standard at its property boundaries, the fact is that other road and rail noises already exceed the standard, and, to the listener, any additional RIC noise will be additive. See Exhibit E.

Perhaps RIC is punting on the noise policy because it knows that the noise generated by 2 to 6 data center buildings and hundreds of generators (that require monthly testing, therefore occurring on a daily basis) will exceed the county's policy on noise. A "real-world" study after building the fully operational RIC project will be futile, as RIC or its successors can simply pay the wholly inadequate fine of \$250 for the first offense, plus \$500 for every day thereafter, as limited by VA State law. That fine is a minor "cost of doing business" for a data center operator.

After a year of attempted noise abatement, Amazon in Haymarket was unable to prove it could comply with Prince William County's more lenient noise ordinance. See Prince Williams Times, "Residents turn up the volume on data center noise complaints; Protesters warn of data centers' impacts across the county," Jill Palermo, August 31, 2022, updated February 6, 2023. See also Washington Post, Caroline O'Donovan, "Fighting back data centers, one small town at a time," October 5, 2024 (with embedded data center noise video). Remington should not be our county's guinea pig for data center experiments that exceed Fauquier's existing noise policy or ordinance.

RIC has also ignored the DC Policy's request that it consider providing, at RIC's cost, **continuous noise monitoring devices** around the property to transmit actual noise levels on a continuous basis to a remote, publicly accessible, on-line data base, probably because that also would be an admission against interest that this RIC project inevitably will exceed Fauquier's noise policy and ordinance for data centers. DC Policy at page 6, III. F. 4 and 5.

In any event, Fauquier's current noise ordinance is wholly inadequate to address the unique noise and vibration emissions of data centers. The only known remedy for real-world data center sounds is to site them far away from any residence, village or town. Given CFFC's previous analysis and that of others in PWC, it is not prudent to allocate land to data centers that is less than 1/2 mile (2640 feet) from the closest residence. Moreover, up to six data center buildings will emit more noise than one, just as multiple car horns are louder than one. So, the amplification of noise from multiple data center buildings warrants removal further away from any residence. RIC is simply a developer that will be long gone when residents' complaints about noise are realized. See Exhibit E.

With this RIC project, nearby residents will be forced to endure unremitting noise and vibrations, 24/7 from 2-6 enormous data center buildings and hundreds of generators when tested daily or in continual use during likely power blackouts, in addition to other background and data center noise. Even if RIC ultimately were to try to divide and conquer the noise ordinance by claiming that each data center building has a different "operator" subject to the noise ordinance, it is unlikely that even one of the data center buildings could meet Fauquier's DC policy on noise.

CFFC has demonstrated that the one, relatively smaller Amazon data center building in Warrenton would exceed Fauquier's noise ordinance. The RIC project as a whole must comply with the county's noise ordinance, without exception, and should comply with its data center policy, too. RIC has failed to demonstrate this compliance requiring that this Application should be denied.

Sustainability. DC Policy encourages data centers to commit to and proffer a **Power Usage Effectiveness (PUE) of 1.5 or less**, and recommends: orientation of buildings to use passive cooling and daylight opportunities, incorporation of innovative technologies which reduce power consumption, reuse of heat generated by the data center operations, use of heat reflective roofing, use of sustainable building materials, and use of **EPA Tier 4** generators or their equivalent. DC Policy at page 6, III.G.1-7.

These are not unattainable standards, but rather existing, sustainable practices to which a world-class data center should commit. The Applicant's failure to make these specific commitments demonstrates its inability to meet the DC Policy on sustainability of data centers and should, therefore, be denied. Fauquier and Remington must not be dumping grounds for low quality data centers that are not committed to specific sustainability standards.

Utilities. DC Policy requires that a successful RIC project will thoroughly demonstrate how the data center's utility needs will be met. Applications are expected to provide information related to electrical load requirements and illustrate that any needed expansion of utilities can be done with minimal impacts and compatibility with the surrounding area. DC Policy at page 7 IV. RIC's application does not meet these requirements, only acknowledging that it will require up to 900 MW of electricity. This is not a minimal impact, far exceeding by multiples the totality of Fauquier's current electric usage, and is incompatible with the surrounding area. Existing transmission lines will have to be augmented, likely with additional transmission lines that require new rights of way, and up to three new substations will be required, while all ratepayers will be paying for an increased electric infrastructure that benefits a private, subsidized industry. See Exhibit B, PJM slide.

Water. Fauquier's ordinance and policy require operations to use recycled water. Other data centers in Fauquier, including the RTP, have committed to compliance with Fauquier's ordinance. RIC has proffered providing recycled or trucked in water from sources that are not part of Fauquier County. This is unacceptable and requires rejection. Many Fauquier residents and farmers rely on their own well water. Watersheds do not differentiate among other counties', FCWSA, Remington or Fauquier water. Just this summer, Fauquier encountered a long drought necessitating restricted water usage. Recycled water must be used, not any other water. **During a drought, whose water supply will be prioritized—residents', farmers', or data centers' water supply?**

Decommissioning. Unfortunately, DC Policy does not address decommissioning of data centers, nor does RIC. Given the speed of technological innovation that could render large-scale data center buildings obsolete,¹² CFFC urges the County to develop a decommissioning plan for this and other data center proposals similar to that provided under Fauquier's Utility Scale Solar ordinance, as amended to incorporate CFFC's recommendations that were previously submitted to the County. See FO, Pt. 20, 5-2003, 26-29, and CFFC, "Minimizing the Impact of Utility Scale Solar Facilities on Agricultural Land, Open Space, and the Environment" at pp. 9-17, 26-29. The scale of the RIC Project and magnitude of its impact warrants such a

¹²" [Moore's Law](#)," is an observation that the number of transistors on a chip doubles approximately every two years. This is an empirical relationship that describes a long-term trend in technology that requires planning for decommissioning of the potentially obsolete data center buildings and their contents.

requirement with a decommissioning bond. Otherwise, Fauquier and Remington could be left with huge, abandoned warehouses, containing obsolete equipment that leech toxic chemicals and blight our countryside.

THE RIC PROJECT WILL GENERATE WATER, NOISE, AIR AND LIGHT POLLUTION

The RIC area currently suffers from repeated flooding. Adding over 2.2 million square feet of impervious surfaces will only exacerbate this issue and needs to be addressed with an independent storm water management study, prior to further consideration of this application. Further, CFFC believes that a **third party, independent cumulative impact assessment** should be conducted before any more data center projects are approved. FEMA floodplain information and Virginia SWM requirements are based on past data, particularly given the increasing velocity and frequency of heavy rain events that could result in catastrophic flooding. Clear-cutting tree and ground cover will only exacerbate the problem, while removing valuable carbon, noise and water absorbing flora.

Data centers are large, noisy, high-energy consuming, brightly-lit industrial buildings on closed campuses. Not only will these RIC data center buildings be out of character for the area, but they will also operate 24/7, using enormous amounts of energy that will contribute to Dominion's plans to retain or import its fossil fuel-sourced electricity, requiring more electric infrastructure, emitting diesel or gas generator particulates and fumes, emitting constant noise and vibrations, and, throughout the night, emitting lights from the 65+ foot tall rooftops that will loom over homes and buildings. Sleep for residents and animals alike will be disturbed, destroying the area's rural, agricultural and historic character.

CONCLUSION

Amending Fauquier's Comp Plan and Rezoning Remington's Service District for additional data centers would be wrong for the area's village character. The RIC project will generate noise and vibrations that will be an endless nuisance, generate emissions that will pollute the pristine air in Fauquier, and produce light pollution at night that will disturb the historic, rural, agricultural character. In addition, without implementation of a cumulative storm water management plan, flooding will increase. Approval of this application will eviscerate the peace and quietude of the area, and detrimentally affect the health, safety and welfare of our residents, as well as set a bad precedent for even more data centers on rural agricultural zoned properties.

This Application should be denied for all of the reasons discussed above.

Respectfully submitted,

A handwritten signature in black ink that reads "Ali Zarabi". The signature is fluid and cursive, with the first name "Ali" and last name "Zarabi" clearly distinguishable.

Ali Zarabi
President
Citizens for Fauquier County

Exhibit A: Estimates of Tax Revenues For Built and Approved/By-Right Data Centers

Tax estimates for 2025 and beyond are based on Fauquier's new BPP rate of \$4.15 in 2025.

Existing, Built, Operating

DATA CENTER	SQUARE FEET	EST TAXES/YEAR, BPP & RE	NOTES
OVH	84,000 sf	\$1.38 M actual in 2023 (BPP=\$1.246 M0 (RE = \$0.125 M)	Reportedly only 62% of capacity is being used. If capacity is fully utilized, BPP taxes would increase. OVH also seeking expansion; see entry further below.
Warrenton Training Center	120,000 sf?	\$5.42 M actual in 2023 - for BPP only, per Eric Maybach in 3/13/24 email.	Three clusters of modular DCs.
-WTC01– Microsoft	50,000 sf?	No RE because of location on Federal property.	WTC1 probably built by Microsoft and commissioned around 2020. Est 8 generators.
-WTC2 – AWS/VADAT A	135,000 sf?	WTC3 not completed until 2024, so there may not have been any 2023 tax revenue, or only tax revenue for a portion of WTC3.	WTC2 built by Amazon/VADATA. Est. 6 generators.
-WTC3 – AWS/VADAT A	(Sizes based on estimates from satellite imagery.)		WTC3 built by Amazon/VADATA in 2023/2024. Three clusters of 8 modular DC units. Est 12 generators.
			WTC data center tax receipts are likely to be significantly higher in 2025 and beyond, due to (a) significant increase in square footage; and (b) County's 20% increase in BPP tax for 2025 and beyond.

Approved or By-Right

DATA CENTER	SQUARE FEET	EST TAXES/YEAR, BPP & RE Based on \$26 – \$42 per sf under roof	NOTES
Remington Tech Park	1.3 M sf in 6 one-story buildings On 234 acres + Substation	\$34 M - \$55 M	Was approved by BOS in 2018 and is being developed. Site owned by Point One which will lease to tenants.

Cyrus 1/Vint Hill	875,000 in four 2-story buildings On 48 acres	\$20 M - \$37 M	Cyrus 1 submitted application to County 3/11/24. Will remain "by right" after 3/16/24 rezoning of PCID by BOS.
OVH expansion/Vint Hill	110,000 sf On 10.8 acres	\$2.9 M - \$4.6 M	Proposed. Will remain "by right" after 3/16/24 rezoning of PCID by BOS.
Vint Hill Corners in Vint Hill PCID	365,000 sf On 47.7 acres In 2 one-story buildings	\$9.3 M - \$15 M	Pre-application submitted. Was grandfathered "by right" by BOS on 5/9/24.
Amazon/Blackwell	220,000 sf	\$5.7 M - \$9.2 M to Town and County combined. County share could be 2/3 of that - \$3.8 M to \$6.2 M.	In litigation. SDP pending for ToW approval as of 4-2-24.
TOTALS FOR ABOVE	3.039 M sf	\$76.7 M to \$105.6 M	

Exhibit B: Existing Transmission Lines Are “Overloaded” Per PJM

Approval will generate more data center projects in Remington and more Electric Infrastructure on top of historic Rappahannock battlefields. (Cindy Burbank, Protect Fauquier)

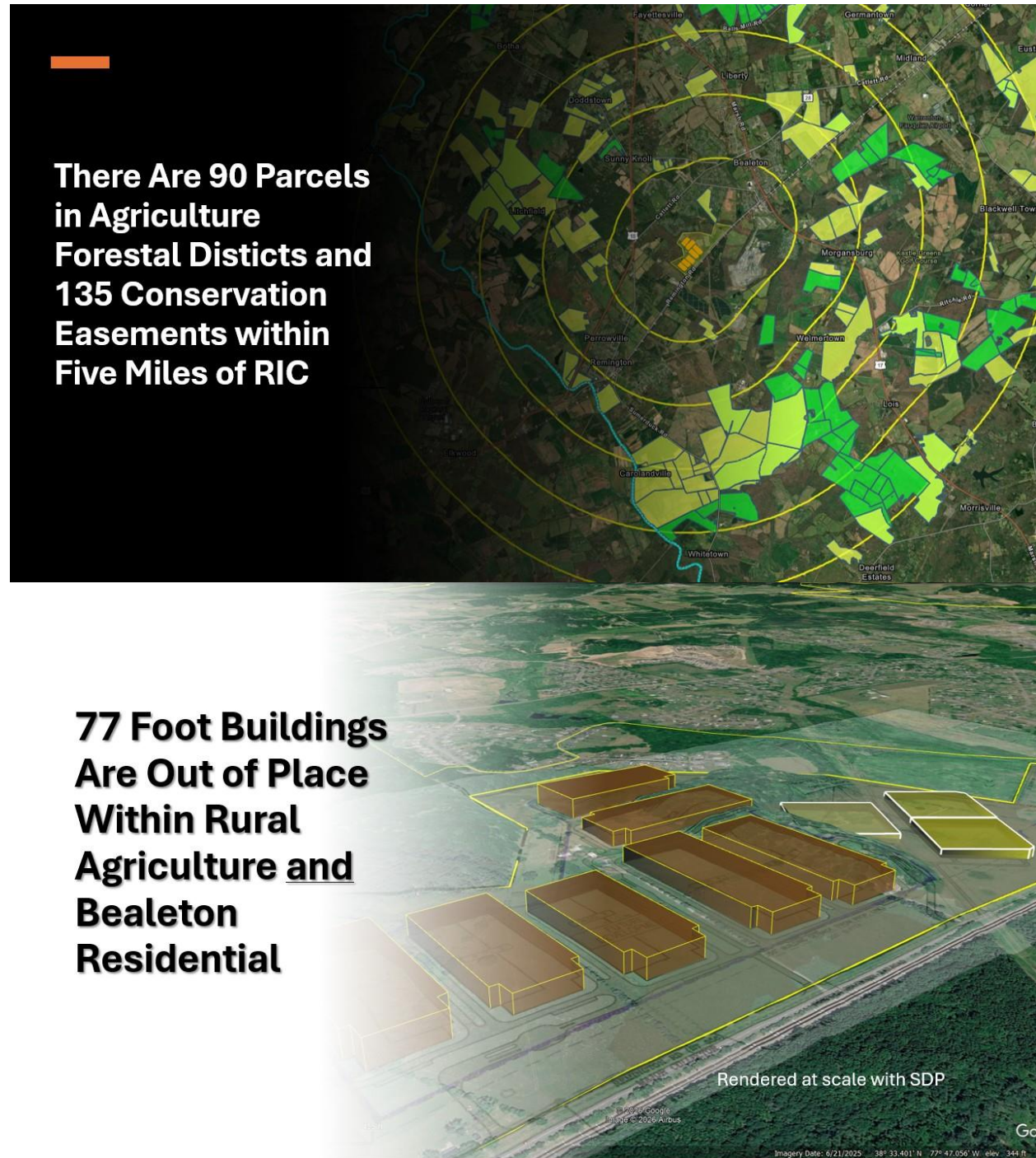
RIC Is Outside Service Districts



RIC Is Currently Zoned RA



Exhibit C: Land in Permanent Easement (green) and Agroforestral Districts (yellow) within Five Miles of the Proposed Data Centers. There is overlap between these programs which, combined, total approximately 12,000 acres in public and private conservation investments. (Dave Gibson, CFFC)





**1,671
Residences
within one
mile of RIC**

Exhibit D: Historic Flooding of Remington and Stormwater Drainage in Remington
(Photos Compliments of Mary Root)



*Tinpot Run - Lee's
Glen in background
after Feb. 14, 2003*



Exhibit E

While the Fauquier Noise Ordinance requires that RIC only meet the standard at its property boundaries, the fact is that other road and rail noises already exceed the standard.

