



July 1, 2026

TO: Fauquier Planning Commission, Board of Supervisors and Staff

RE: Gigaland/aka Remington Digital Campus: COMA-25-025997, REZN-25-025998, SPEX-25-025999, and WAIV-25-26023.

Dear Honorable Commissioners, Supervisors and Staff:

Citizens for Fauquier County (CFFC¹) opposes the latest Remington Digital Campus, i.e., Gigaland data center application for the same reasons that we opposed the prior application (see prior CFFC Comments, attached hereto as Exhibit A). Changing its name does not change that the application is contrary to Fauquier's Comprehensive Plan, including the Remington Service District Plan, Fauquier's Zoning Ordinance, and Data Center Policy, endangering the health, safety, and welfare of Fauquier and Remington residents. Consequently, this application should be denied.

In addition to CFFC's past comments that are still apt, we offer the following comments on Gigaland's most recent Proffer Statement dated June 12, 2026, that would be the only provisions of the application that are binding on Gigaland and its successors and assigns, in addition to Fauquier's Zoning Ordinance.

Location

The project is not located in an isolated industrial landscape. It sits within a rural and historic setting associated with the Rappahannock Station I and II Civil War battlefields and near mapped battlefield core and study areas, the Mt. Holly Ridge-Marsh Run Rural Historic District, Piney Ridge and other heritage resources. The relevant question is not merely whether a building can be partially screened from one roadway, but whether the scale, lighting, mechanical equipment and utility infrastructure are compatible with the historic landscape that the Comprehensive Plan directs the County to protect.

CFFC's prior GIS review identified more than 12,000 acres of conservation easements, Purchase of Development Rights properties and Agricultural and Forestal District lands within approximately five miles of the site. Those public and private conservation commitments preserve an interconnected rural landscape rather than a collection of unrelated parcels. The application does not evaluate how the RDC, together with RTP, would affect the scenic setting, ecological connectivity, and long-term conservation value of those protected lands. A current cumulative viewshed and historic landscape assessment is therefore necessary before rezoning.

¹ Founded in 1968, Citizens for Fauquier County is a non-partisan, non-profit, volunteer driven organization representing thousands of residents active in local conservation efforts. It is CFFC's mission to preserve the natural, historic and agricultural resources of Fauquier County, and to protect the county's uniquely rural quality of life through education and leadership.

Size

Although this proposed data center is smaller than the prior one, with buildings 998,662 square feet in size, it is still huge. The Gigaland buildings alone are equivalent to more than five Super Walmart Centers or 17 football fields that will be fenced off and closed to the public, with 24/7 noise, innumerable back-up generators, and security lighting. This is an intensely industrial facility incompatible with its R-1 residential zoning, nearby residential areas, and the small, historic, rural town of Remington.

Environmental Assessment and Site History

The application continues to rely on ENVECO Environmental Solutions' February 2024 Phase I Environmental Site Assessment, based on a February 21, 2024 site visit. ENVECO states that it was not provided with development plans and that later site changes were outside its scope. The report was prepared to identify recognized environmental conditions for CERCLA liability purposes, not to provide the environmental baseline needed for a major industrial rezoning.

The report provides no meaningful assessment of flora, fauna, habitat, forest condition and regeneration, invasive species, wildlife use, sensitive species, wetland functions, or ecological connections with adjoining lands. Its description is limited largely to recently cleared land, residual woodland, utility easements, wetland flags, ponds, and water-filled depressions. These observations do not establish the condition or conservation value of resources that would be displaced or fragmented.

The property history is also incomplete. ENVECO acknowledged that no chain of title was provided, boundaries were not marked, the user questionnaire was incomplete, and the property owner was not interviewed. The report does not adequately reconstruct agricultural, forestry, residential, and clearing history; resolve the former residence, septic system, or possible fuel storage; or examine ownership changes, land-use taxation, Agricultural and Forestal District enrollment, or related commitments. These omissions are material to rezoning even if they did not prevent ENVECO's narrow Phase I conclusion.

The review of adjoining lands is similarly limited and does not assess nearby residences, farms, forests, wetlands, wells, conservation easements, Agricultural and Forestal Districts, historic resources, or cumulative effects with Remington Technology Park. The County should require an updated Phase I ESA and a separate natural-resources, land-history, and cumulative-impact assessment before finding Comprehensive Plan conformity.

Although Gigaland offers to downzone 43.16 acres to RA and place them in a conservation easement, this area will include Gigaland's utility infrastructure, including two wells, a water treatment plant, an access road, and buffer plantings. Has it been determined that this is acceptable to the County or another conservation organization? If not, would the area still be downzoned?

While the height of the buildings has been reduced to 45 feet, Gigaland notes that additional rooftop mechanical equipment may be screened "by a visually solid fence, screen wall or panel, parapet wall or other visually solid screens..." of unspecified height. The height of these screens is not included in the proffers, but should be, and included in any visual representations. Proffer Statement at III.C and D.

Smaller isn't small. Nearby neighbors and the historic Remington area will be negatively impacted. Instead of a Civil War battlefield study area that is walkable by residents and visitors

through native trees and grasses, there will be large, industrial scale buildings that will overshadow the quaint town of Remington, nearby historic districts, and the adjacent residential development of The Meadows. People will be excluded by security fencing, disturbed by noise and lighting, and suffer air pollution from power generator particulates.

Watershed Impacts

Gigaland would add roughly 1.2M ft² of hard surface atop a ridge draining into mapped (VDCR) wetlands and a FEMA 100-year floodplain (Tinpot Run) that 135 years of NOAA data indicates major flood events every 12.3 years. Most of the water from the RDC property drains into the RTP property, which will increase runoff into the wetlands and headwaters of Tinpot Run. Regular local flooding along Justin Court in The Meadows already yields wet basements, abundant mosquitoes, and road closures. There are already an estimated 20 homes in the FHA in the town of Remington which require expensive flood insurance. Moreover, additional runoff into this area will jeopardize RTP's proposed additional homes in the Meadows itself. The cumulative impacts of another data center, which drains quickly into the Rappahannock River requires more than a piecemeal approach.

- Gigaland's data center application should not be approved because it is incompatible with the Fauquier and Remington Comprehensive Plans for a walkable, mixed-use community that is compatible with Fauquier's rural character.

Power

At an estimated 600 MW, Gigaland's electricity load exceeds four times Fauquier's current county-wide usage (130 MW). Dominion will likely require multiple new substations and transmission lines. Ratepayers—not developers—will bear the cost of this massive infrastructure buildout. Gigaland proffers that "all new power lines, including transmission or substation feed lines and power lines feeding to the data center buildings shall be placed underground" as required by Fauquier's Ordinance. Proffer Statement at II. A. This begs the question of who will pay for any additional or upgraded power lines that Dominion plans to build outside the data center site in order to provide electricity to Gigaland, and whether Gigaland will pay for their undergrounding.

Gigaland has not demonstrated that Dominion's current plans for new and upgraded transmission lines include providing power to Gigaland, as it hasn't been approved and does not have a final contract with Dominion for electricity. There is no assurance that Dominion will provide Gigaland with electricity by 2030, any more than Dominion assures any speculative developer that eventually it will provide power.

In any event, Gigaland should proffer paying for any additional or upgraded lines, inside and outside its site, proportionate to its usage. Such payment should also include a proportionate payment for undergrounding new lines outside the project, to avoid further destruction of Fauquier's view sheds.

CFFC also questions the power requirements for this development. Gigaland's Proffer Statement does not mention the power it requires for the project or the number of backup generators required. While a request for two 300 MW substations (for a total of 600 MW) is included in the application (down from the four previously requested), there is no proffer related to the actual power necessary to operate the six data center buildings and other operations on site. See Proffers at II.E. The 600 MW substations are equivalent to the electricity usage of up to 220,000 homes that is nearly nine times over Fauquier County's current residential usage with approximately 26,000 homes.

Gigaland should proffer its maximum power usage, and the number and type of backup power generators which should be at least the Tier 4 generators Fauquier's Data Center Policy recommends.

CFFC believes that only one substation is necessary for this data center development based on the power requirements submitted for other data centers, as well as the CLOA with Dominion, dated March 2, 2026, for 300 MW. In the past, Gigaland "future proofed" its application by requesting extra substations. We believe that Gigaland again is exaggerating its actual need for substations and that one would suffice, as the size of its buildings generally only warrants 300 MW of power or less, and only one has been approved for the nearby Remington Technology Park (RTP) which is larger than the proposed size of Gigaland.²

Moreover, CFFC is concerned that Gigaland is obscuring the fact that to address Dominion's delayed provision of electricity to existing contracted customers (which Dominion generally estimates at seven years), Gigaland will need to "BYOP," i.e., bring its own power, like RTP.

If the Proffers are approved as is, Gigaland likely will invoke its proffer stating that "[A]ccessory uses are permitted ... subject to review and approval by the Zoning Administrator....[not the BOS]." "Such accessory uses may include ...generators, chillers, and transformers." See Proffer Statement at II.A. Thus, Gigaland could use unspecified natural gas generators or other privately owned power generators to fill the electricity gap. This should not be permitted without further information, public review, and approval by the Board of Supervisors, not the Zoning Administrator.

Approval of this facility without information on the amount and source of power would set an unfortunate precedent for re-zonings and could adversely impact the entire County with more air pollution, transmission lines, large substations and potential electricity shortages resulting in blackouts. Approval would likely also contribute to electricity rate increases for residents and small businesses.

- Fauquier's Data Center Policy recommending Tier 4 (or better) generators should be required and proffered for all back up generators. Without reasonable information about the sources and amount of power for the proposed facility, no approval should be forthcoming.
- CFFC understands that the VA DEQ (as of July 1) requires Tier 4 generators or their equivalent. However, Gigaland states that if Tier 4 generators are not commercially available at the required capacity, it will install "the most stringent tier certification available." This is not acceptable or even compliant with current law. See Proffer Statement at III. H.
- Air Quality – Gigaland proposes 136 diesel backup generators. This poses a significant threat to local air quality during monthly testing, especially during extended grid outages. Even with EPA Tier 4 certification, cumulative emissions during weekly testing or prolonged operation could resemble those of a small fossil fuel power plant. The

² Applicant's prior submission of Dominion's Letter of Authorization, Electrical Service Availability, and Engineering Service Plans relate to the earlier withdrawn application and are now out of date and inapplicable to the current application. Even so, the developer has acknowledged that the previously requested four substations were for "future proofing" and were not necessary for the original larger, eight data center buildings.

discussion presented in the application omits any assessment of air dispersion or ambient pollutant concentration or compliance with EPA's New Source Performance Standards (NSPS, 40 CFR Part 60 Subpart IV), nor is there evidence provided that the project will avoid triggering minor New Source Review permitting requirements under Virginia DEQ thresholds. This omission represents a serious oversight given the scale of backup power proposed.

Noise

Gigaland proffers compliance with Fauquier's noise ordinance, excepting construction, repair, alteration or demolition work, as well as emergency generator use. Gigaland limits noise measurement testing to after a newly constructed building becomes fully operational. Subsequent County sound or noise measurement may only be performed within 90 days if there has been a change in the operations or use of any building, with no more than three sets of county-requested measurements in any one calendar year. If a building is not "fully operational," or "there is no change in the operations or use of any building," then there is no county noise testing. Proffer Statement at G.vi (emphasis added).

The April 24, 2026 Phoenix Noise & Vibration report updates the layout to six buildings, 353 rooftop chillers and 136 backup generators, but it remains a preliminary feasibility model rather than a final, project-specific acoustic design. Phoenix states that definitive design data were unavailable and that the equipment quantities were estimated by Gigaland from assumed building power requirements. The application provides no final HVAC equipment schedule, generator selection, exhaust-stack configuration, manufacturer-certified octave-band sound data, or enforceable acoustic performance specifications.

The report is internally inconsistent about generators. It describes 136 proposed units as 4.4 MW diesel generators, but the sound-power spectrum used in the model is identified as a Jenbacher JMS 624 GS-N.L 4.4 MW unit, which is a natural-gas reciprocating engine rather than a diesel generator. Diesel generator packages and large natural-gas engines have materially different combustion, exhaust, intake, cooling-fan, enclosure-radiation and low-frequency acoustic profiles. Phoenix provides no explanation for this substitution and does not demonstrate that the modeled gas-engine spectrum is representative of, or conservative for, the diesel equipment the report says will be installed.

Phoenix predicts that the unmitigated project would exceed both County standards, with levels reaching as high as 80 dBA on the two most affected adjoining residentially zoned parcels. The unmitigated contour graphic also shows broad noise spillover around the buildings and beyond the site. The report's "mitigated" contours do not depict a designed system; they are created by substituting lower target sound-power levels for the actual unmitigated source data.

Most importantly, the consultant's compliance conclusion is expressly conditional: "If noise generated by each mechanical unit is mitigated by the use of silencers, mufflers and generator enclosures, or by selecting quieter equipment than those currently analyzed, noise impact upon the surrounding properties can be maintained below Fauquier County Zoning Ordinance limits." No selected equipment, silencer insertion-loss data, enclosure ratings, barrier specifications, manufacturer guarantees or commissioning protocol demonstrates that these reductions can be achieved and sustained. Saying that noise may be reduced enough to comply is not a finding that the proposed facility will comply.

The model also does not adequately document meteorological propagation assumptions, ground absorption, source directivity, barrier insertion loss or modeling uncertainty; evaluate tonal and low-frequency characteristics; or assess cumulative noise from the two substations, the adjoining RTP campus and any temporary or permanent on-site generation used to bridge delayed utility service. Compliance with a County ordinance not designed around continuous, tonal and low-frequency data-center noise is not, by itself, a demonstration of land-use compatibility or protection of nearby residents.

Under Gigaland's proffers, excess noise would trigger mitigation measures, with no final deadline for compliance, so long as efforts to mitigate are being made. All the time frames for mitigation are repeatable until "full compliance is achieved." Nearby residents could be trapped in a continuous, hellish loop of excessive noise, 24/7, so long as Gigaland keeps "trying" to mitigate the noise. Proffer Statement at G.vii.e. Cumulative noise from the RTP next door will exacerbate Gigaland's noise to the distress of residents.

Nearby residents have faced similar commitments from data center operators to bring their noise into compliance with local ordinances, with lengthy, unfulfilled promises to mitigate the noise. See Prince William 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).

If Gigaland resorts to adding a large private power station as a stop gap for delayed Dominion power, that additional noise is also not addressed, while any noise from generators run for emergency purposes is exempt.³ Proffer Statement at G.iii.

- Fauquier's Data Center Policy recommending continuous noise monitoring devices with a real time public website for testing results should be implemented at Gigaland's expense. Fauquier Data Center Policy at III.F. 5. and G. 7. A final deadline for demonstrating noise compliance prior to issuance of an Occupancy Permit, with a serious penalty such as non-issuance or revocation of any Occupancy Permit, should be required.

Decommissioning

Fauquier has a decommissioning ordinance for utility scale solar projects and needs a similar requirement or proffer for data centers due to their huge scale and impact on the county. While one cannot predict the future, the past is prologue. In the high technology industry, what was once large is now microscopic, so we should be prepared for data centers to become obsolete.

- Fauquier has a decommissioning path and should require it for all new data centers. See USS Zoning Ordinance on decommissioning.

Further thoughts on Gigaland's proffers:

- CFFC recommends that all vegetation proffered be of native plants and trees. Proffer III.E.
- CFFC recommends that if roads are widened, the speed limit be maintained and not raised. Proffers at IV. C. and D.

³ Notably, Virginia's Department of Environmental Quality has expanded the interpretation of "emergency" so that generators may be run more often in the future than they have in the past.

- CFFC recommends that the use of “recycled water,” not just water “sourced from water hauling companies” be required throughout its proffers. Proffer Statement at V. B.
- CFFC recommends that Gigaland add a proffer, as it has in the past, for the cost of any ladder truck (estimated to cost more than \$2 million) if needed by the Remington Volunteer Fire Department to avoid catastrophic delays in the case of a fire at Gigaland.⁴
- CFFC recommends that the proffer of \$3 million for the Fauquier PDR program be amended to ensure it is enforceable under Virginia law.

Conclusion

Once again, Gigaland has requested approval of a data center application that is incomplete, lacks transparency, and does not comply with Fauquier’s Comprehensive Plan, the Remington Service District Plan, the Zoning Ordinance and Fauquier’s Data Center Policy. As such, CFFC recommends that it be rejected because approval will negatively impact the health, safety and welfare of Fauquier, and, in particular, Remington residents.

Sincerely,



Ali Zarabi
President, Citizens for Fauquier County

Exhibit A: [CFFC’s Prior Comments dated March 18, 2025](#)

⁴ Notably, Gigaland’s developer has continued to offer payments to Remington area residents, as well as several Fauquier nonprofits, in addition to its proffers. Such unethical offers should be discouraged as they smack of buying support from residents and the Remington Town Council. See Facebook comment from Gigaland’s developer, Art Lickunas on the Fauquier Times, “Gigaland resubmits a scaled down data center project,” January 9, 2026: **“The previously discussed community contributions — a \$500,000 gift to the Meadows community and \$1,000,000 to the Town of Remington — remain fully in place. Based on county feedback, these contributions cannot be included in the formal proffer package and were therefore removed from the proffer documents. Instead, they will be executed separately through independent agreements outside of the proffer structure, in alignment with the county’s guidance.”** *These are not charitable donations, but appear to be improper payments in exchange for endorsements. See also, Fauquier Times, “Gigaland data center developers offer millions in grants to Fauquier nonprofits. Written agreement suggests donations depend on data centers’ approval” June 15 and 16, 2026.*

