



September 16, 2026

TO: Members of the Planning Commission, the Board of Supervisors and Staff

RE: Comprehensive Plan Compliance Review COMR-26-027239, Portrush Energy Center - An Application for a Comprehensive Plan Compliance Review, in Accord with Code of Virginia Section 15.2-2232, as to Whether the Proposed Location, Character and Extent of a Battery Energy Storage System (BESS) is Substantially in Accord with the Comprehensive Plan (PIN 7916-43-0783-000, Scott District)

Dear Honorable Planning Commissioners, Members of the Board of Supervisors and Staff:

Citizens for Fauquier County (CFFC) respectfully submits these recommendations related to the above captioned ZOTA. In the staff report, staff has outlined provisions of the Comprehensive Plan pertaining to the ZOTA in question. The land in question is Zoned RA where the applicant desires to place an industrial use which is clearly in violation of the Comprehensive Plan.

The property in question is part of an early 19th century farm known as Richland. The northern part is actively farmed and the second half is wooded with second growth forest. It is located in the core area of the Buckland Mills Battlefield. The Property is not located in the New Baltimore Service District. This is exactly the type of farmland that the Comprehensive Plan (Plan) endeavors to protect. The Plan clearly states that commercial uses that are not compatible with the dominant agricultural land use pattern should be directed to locate in towns and Service Districts and that new utilities should be located in areas of commercial or industrial lands.

The Plan also directs that:

- The RA and RC districts represent over 90% of the county's land area and it is vital that the standards in those zoning districts should be maintained to support the long term protection of rural character and resources in the county. Additionally the Plan encourages the maintenance of a hard edge surrounding the county's service districts.
- The forest land of Fauquier County is one of its most precious resources. They are used for recreation, watershed protection, wildlife management, a variety of forest products, provide for carbon sequestration, ground water infiltration, contribute to the rural character and provide important habitat for both game and non game wildlife. The loss of forests in Fauquier County is a real threat as the county continues to experience development pressure.
- The success of the rural economy and the preservation of rural character are interdependent, one cannot exist without the other.
- Fauquier County's heritage resources are integral to the county's identity, character, and sense of place. Historic places are irreplaceable resources essential to the cultural, environmental, social and economic well being of the county.

As outlined above this development does not meet the Plan requirements for protection of RA farmland, forests, historic and natural resources

We should also be mindful of the immediate challenges faced by our county as a result of the now well recognized detrimental impacts of data centers. Accompanying significant data center

pressure on our electric grid are ancillary structures such as Battery Electric Storage Systems (BESS). There are significant federal and state incentives for BESS which encourage developers to construct new facilities. Combined with the incentives, Fauquier County is further at risk because our land prices are generally below those in our neighboring counties such as Loudoun and Prince William. So the developers will be incentivized to look to cheaper farmland in Fauquier. We can expect more applications such as the current proposal. Consequently, we should avoid the slippery slope of approving applications for BESS and other such industrial facilities on RA zoned land. CFFC does not oppose all BESS facilities and could possibly support them if they are properly located on areas zoned industrial and commercial as the Comp Plan encourages.

Consequently, we must oppose this application for rezoning.

Sincerely

A handwritten signature in black ink that reads "Ali Zarabi". The signature is written in a cursive, flowing style with a large, prominent 'A' and 'Z'.

Ali Zarabi

President, Citizens for Fauquier County.