



March 7, 2022

Mr. Sanford Reaves, Jr., Chairman
Culpeper County Planning Commission
302 North Main Street
Culpeper, VA 22701

Re: Request by Marvell Developments LLC to Rezone 243.12 Acres from A1 to L1 (Case No. Z-454-22-1)

Dear Chairman Reaves,

The Piedmont Environmental Council (PEC) respectfully submits this letter regarding the rezoning application for Tax Map 54 parcels 14B, 14C, and 14C2 in the Stevensburg Magisterial District. It is our hope that both the Culpeper County Planning Commission and Board of Supervisors will take these comments into consideration when evaluating this rezoning application.

PEC recognizes the importance of economic development in Culpeper County, and we acknowledge that data centers, when appropriately sited, can provide a positive impact with regard to jobs and local tax revenues. We have several concerns about this specific proposal, however, and believe that it would not be in the best interests of Culpeper County's residents for this rezoning application to be approved. Specifically, our concerns about this proposed development include:

- *Adverse impacts to historic and scenic resources:* The proposed data center would be located directly adjacent to Salubria, which holds an 18th-century manor house listed on the National Register of Historic Places. It would also be directly across Route 3 from Hansbrough Ridge, an important site on the Brandy Station Battlefield that is likely to be incorporated into the Culpeper Battlefields State Park recently approved by the Virginia General Assembly. These historic sites, as well as others in close proximity to the project area, contribute meaningfully to Culpeper's heritage tourism economy and would be adversely impacted by the visual presence of not only a 45-foot high (plus mechanicals) data center complex sprawling over 427,000 square feet, but also the associated 6-acre substation and accompanying transmission line infrastructure.
- *Spot rezoning of agricultural land:* The parcels in question are currently zoned for agricultural use and require a rezoning to light industrial to accommodate the proposed data center complex. PEC does not believe it advisable to spot-zone land for industrial use, a designation that regardless of whether this data center project proceeds, would allow a host of high-impact, pollution intensive uses in the future. Sufficient industrially zoned land that could accommodate this project exists elsewhere in the County.

- *Incompatibility with the County's comprehensive plan:* The County's future land use map designates this area along Route 3 as agricultural and open space, reflective of a stated goal of the Culpeper County Comprehensive Plan to "maintain the rural character of Culpeper County." The Comprehensive Plan further states that commercial development should be encouraged "within designated village centers where it can be economically and conveniently served by public facilities" so as to "limit the extension of infrastructure improvements into agricultural and natural resource areas." Culpeper County has already designated five technology corridors, including four in the Stevensburg Magisterial District, encompassing nearly 3,000 acres specifically to attract data centers and other similar businesses, yet this project does not lie within any of those designated areas.

While the above considerations strongly suggest that this project is inappropriate for the area in which its proposed, at the very least PEC believes that County officials should request clarification and additional information from the applicant on several fronts before taking any action on this rezoning request. At present, numerous questions are deserving of further study including what infrastructure improvements will be necessary to construct and operate this data center complex (e.g. new transmission lines), what the impact will be on the area's ground water supply, and what the visual impacts will be to the surrounding area (we believe that a more comprehensive viewshed analysis than what was provided with the applicant's submittal is warranted).

Thank you for your consideration of these comments. Should any member of the Planning Commission or Board of Supervisors wish to discuss these comments further, please do not hesitate to contact me at (434) 977-2033 x7045 or agillenwater@pecva.org.

Sincerely,



Adam Gillenwater
Field Representative – Culpeper