

**STATEMENT OF JUSTIFICATION  
WARRENTON DATA CENTER SPECIAL USE PERMIT  
Parcel ID 6984-69-2419-000 (portion)  
Owner/Applicant: Amazon Data Services, Inc.**

April 13, 2022

**Introduction.** Amazon Data Services, Inc. (hereinafter, the “Applicant”), is the owner of property identified as Parcel ID 6984-69-2419-000, on the east side of Blackwell Road and north of Country Chevrolet. The parcel is approximately 41.793 acres in size, and this Special Use Permit (SUP) is for approximately 33.62 acres of the parcel (the “Property”).

The Applicant seeks this SUP to allow the development of a data center (the “Project”). As is well known, the Council amended the Town’s Zoning Ordinance on August 10, 2021, to include such a use by SUP in the I (Industrial) District, to which the land has been zoned for many years.

**Land Use and Compatibility with Existing and Proposed Uses Adjacent and in the Vicinity and Economic Impact.**

The Applicant seeks to build one single story structure of approximately 220,000 square feet. The structure is shown conceptually on the Special Use Permit Plan (“SUP Plan”) prepared by Bohler Engineering and submitted herewith.

The Property is identified as a part of the New Town Warrenton District in the 2040 Comprehensive Plan, but, as noted, it has long been industrially zoned and has sat fallow for decades. The proposed data center will be so well-designed and sited in this location that it should be a welcome addition to the older uses that predominate on Blackwell Road from Lee Highway to the Giant Food Store. The buildings to the south of the site currently house Country Chevrolet, Sheetz, and the small retail center with the Tae Kwon Do dojo, The Cotton House, and Summit Motors. Across Blackwell is the Giant-anchored strip center. A data center is a comparable use – at the very least – to all, and will have visually less impact on its surroundings than any of them because of the ability to screen it substantially from view. The closest residence is approximately 400 feet from Blackwell Road, on Arbor Court, and the building will be set-back approximately 1,000 feet from Blackwell Road. With ample landscaping the data center will be well shielded from view from the west, and from the east as well. Given the site’s importance as a gateway into the Town, the Applicant intends to screen the site with substantial landscaping to shield views of the buildings from the east and the west.

The Applicant wishes to locate in Warrenton and invest in the Town. Three of the goals of the 2040 Comprehensive Plan are to grow a strong, diversified, and resilient economy that supports residents and businesses alike, increase the employment base to allow residents to live and work in Warrenton, and to be proactive in the Town’s Economic Development. The Project will have a positive economic impact. To that end, cloud services have become essential to the economy, and the construction of such centers is a capital intensive business.

Data centers are “the Cloud” that has become essential to almost every aspect of today’s home and business life. The proposed SUP is consistent with the Town’s economic objectives since the

approval of this SUP will materially grow its non-residential tax base. A data center produces a substantial revenue stream during construction, pays significant taxes thereafter, and the salaries of operational personnel once a center is completed will likely exceed the average salary of current County and Town residents. The Applicant's spending on equipment, construction labor and materials, utilities, security, data center employee salaries, and third-party services to build and operate data centers has had a major impact on Northern Virginia.

Amazon pays taxes on all of its data centers, principally consisting of an increased valuation of the real property on which the facility sits, and business personal property taxes.

At full buildout there will be approximately 52 employees at the Project, but only a maximum of 32 employees will be present on the Property at any given time, primarily during shift changes. Employees are comprised of engineering technicians, data center operators, security personnel, and logistics personnel. The estimated number of visitors, including vendors and subcontractors, is 5-10 persons per day on average.

**Transportation Impact.** During construction there will be construction traffic that will access the site from Broadview Avenue and Blackwell Road. Once in operation, however, there is very little traffic, and what there is will have no appreciable effect on existing conditions.

**Impact on Community Facilities.** The data center will utilize public water, and will require a connection to the Town's public sewer system. Details on this can be provided during the special use permit review process.

Stormwater management will be provided according to applicable regulations, and plans will be subject to review by the Town during site plan review.

None of these infrastructure facilities will require an expenditure of Town funds, since the Applicant will bear the cost of new infrastructure that will be needed and any upgrades to existing facilities.

The proposed development will have no adverse impact on schools, libraries, housing, or parks.

**Fire, Rescue, and Police Services.** The proposed development will have no significant impact upon the Police Department. The facility will be secured and surrounded by a security fence. Access to emergency service personnel will be assured as required by the new Ordinance provisions.

**Site conditions.** The proposed site is located to the northeast of the intersection of Lee Highway and Blackwell Road and spans a single parcel, which is mostly lawn with some wooded areas in the northwest and southeast portions, and elevations ranging from approximately 510 feet +/- along the north edge, to approximately 465 feet +/- in the northwest corner.

The site is located within the Central Blue Ridge Anticlinorium. According to the USGS Geological Map of Virginia (1993), the site is mapped within the Catoctin Formation – Metabasalt soils. This formation typically consists of grayish green to dark yellowish green, fine grained,

schistose chlorite and actinolite bearing metabasalt. The materials will initially weather into Silty and Clayey Sand and then into Silt and Clay with extensive weathering.

**Lighting.** The Applicant will prepare a detailed lighting plan in conformance with § 9-8 of the Zoning Ordinance and will install lighting in accordance with the plan. This will be reviewed at the time of site plan submission.

**Noise.** The design of the Applicant's data centers employs air cooling systems that do not produce significant noise. Generators are employed in emergency situations only to ensure power supplies in the event of a loss of public power are typically tested briefly every two weeks, and produce sound in the range of 50 to 55 dB, effectively the sound of the human conversation.

**Screening, Buffering, and other Applicable Development Standards.** As set out in the SUP Plan, the required front yard setback in the I District is 100', but the proposed building will be setback approximately 710.9'± from Blackwell Road on the west side of the parcel, as depicted on the Landscape Plan \*(a sheet of the Special Use Permit Plan). The south side yard setback is required to be 100' but will be approximately 179.6'±. The east side yard setback, also required to be 100', will be approximately 256.7'±, and the north rear yard setback of a required 100' will be approximately 414.3'±. The maximum lot coverage can be 75% but the actual lot coverage is 35% (excluding the substation area). There will be 54 parking spaces to service the facility.

The Applicant also proposes a landscaping and buffering program that is set out in detail in the SUP Plan, both on the perimeter of the site and in the small parking area. The Applicant has developed a landscaping and buffering program that shields the facility from public view from all relevant vantage points.

**Height Modification.** On August 10, 2021, the Town Council approved a zoning text amendment related to data centers that included a provision that it may "approve building heights greater than 35 feet during the review of the Special Use Permit. Buildings must be setback one (1) additional foot (horizontally) from the required setback line for each additional one (1) foot (vertically) greater than 35 feet. Building heights shall be in conformance with the Comprehensive Plan." The proposed building height in this case is 37 feet, but the building has been setback from all surrounding property lines sufficiently to accommodate the ordinance requirement. Because the increase is small but necessary to accommodate the facility, the Applicant respectfully requests the additional height.

**Environmental Impact.** In 2020, the Applicant became the world's largest purchaser of renewable energy. Its facilities are almost 4 times as energy efficient as other enterprise data centers because of its use of more efficient servers and increased server utilization for cutting carbon output by 88% versus enterprise centers that have been replaced.