

**BOARD OF SUPERVISORS
BUSINESS MEETING
ACTION ITEM**

SUBJECT: **LEGI-2023-0059, Greenlin Park: ZMAP-2022-0024**

ELECTION DISTRICT(S): Leesburg

STAFF CONTACT(S): Marchant Schneider, Planning and Zoning
Daniel Galindo, Planning and Zoning

PURPOSE: To consider a Zoning Map Amendment (ZMAP) to rezone an approximately 83.17-acre property from the Transitional Residential – 10 (TR-10) and Joint Land Management Area – 20 (JLMA-20) Zoning Districts to the Planned Development – Industrial Park (PD-IP) Zoning District to develop 1,414,440 square feet of data center and utility substation uses.¹

RECOMMENDATION(S):

Planning Commission: At the Planning Commission (Commission) Work Session on [July 30, 2024](#), the Commission forwarded (6-2-1: Jasper and Madireddy opposed; Combs absent) the application to the Board of Supervisors (Board) with a recommendation of approval, subject to amendments agreed to by the applicant regarding additional building fenestration and commitments to continue to research and apply renewable energy options.

Staff: Staff supports Board approval of the application. As amended, the proposal is consistent with the design recommendations envisioned for the Transition Light Industrial (TLI) Place Type of the *Loudoun County 2019 General Plan* (2019 GP).

The Office of the County Attorney has approved the Proffer Statement (Proffers) (Attachment 1) to legal form. The application is ready for action.

BACKGROUND: The subject property is located on the west side of Sycolin Road and north of the Dulles Greenway. Upon development, it will be accessed from Sycolin Road.

¹Under the terms of the December 13, 2023, [Board Grandfathering Resolution](#), the application is excluded from review under the current *Loudoun County Zoning Ordinance* (Zoning Ordinance) adopted on December 13, 2023.

Figure 1: Vicinity Map



Planning Commission: The Commission held a Public Hearing on [May 28, 2024](#). One speaker objected to the application due to concerns regarding environmental impact and the availability of electric utility infrastructure to serve data center uses. The Commission discussed impacts to onsite environmental resources, the location of planned and proposed substations in the area, the proposed building height relative to adjacent buildings, site design, building design, open space, and improvements to Sycolin Road. The Commission requested information from staff and the applicant regarding the implications of data center development within the Leesburg JLMA Employment and TLI Place Types, taxes, and water and sewer extensions. The Commission forwarded (6-0-3: Frank, Jasper, and Madireddy absent) the application to a future Commission Work Session to allow the applicant to address the items discussed at the Commission's Public Hearing.

At the request of staff, the application was deferred from the July 11, 2024, Commission Work Session to the July 30, 2024, Commission Public Hearing as a Work Session item.

At the Commission Work Session on July 30, 2024, Commissioners concluded the applicant's clarifications regarding proffered pollinator plantings within overhead utility easements and travel lane and shoulder improvements to Sycolin Road were sufficiently addressed. Similarly, staff confirmed the issues regarding the redesign of the site entrance to avoid very steep slopes, commitments to stormwater management strategies, and revised habitat study language addressed the outstanding environmental issues. The Commission discussed the heights of existing and approved buildings in the area. At varying building heights between 45 feet and 100 feet, and with

the applicant providing additional commitments to screening mechanical equipment and enhanced landscaping, the majority of the Commission determined that the permitted building height of 60 feet in the IP Zoning District was appropriate, despite guidance from the 2019 GP that buildings within the TLI Place Type should not exceed three stories, or approximately 36 feet, in height. At the conclusion of their discussion, the Commission forwarded (6-2-1: Jasper and Madireddy opposed; Combs absent) the application to the Board with a recommendation of approval, subject to a verbal agreement by the applicant to proffer to 30 percent fenestration for building facades facing adjacent roadways and to continue to explore renewable resources with alternative resources to offset power demand.

Board of Supervisors: The Board held a Public Hearing on [September 11, 2024](#). There were ten speakers, all in opposition to the application, citing scale, environmental impact, increasing utility costs, and loss of flex space. The Board discussed existing and approved building heights in the area, the proposed layout and design, service demands, and building setbacks and buffers. The Board forwarded (9-0) the application to the October 16, 2024, Board Business Meeting for action. The item was deferred from the October 16 and November 7, 2024, Board Business Meetings at the request of the applicant.

The applicant has not held any community meetings. Staff has not received any comments on the Loudoun Land Applications and Comments Tool. The staff reports and associated attachments can be viewed online at loudoun.gov/3362/Land-Applications-and-Comments; search “LEGI-2023-0059.”

Updates: The applicant submitted revised materials on September 26, October 18, October 30, and October 31, 2024, January 2 January 31, and February 13, 2025, including updated Proffers (Attachment 1), Concept Development Plans (CDP) (Attachment 3), and Applicant Response Letters (Attachment 4). Revisions to the application are summarized as follows:

Development Scope: The applicant has reduced the total building square footage for data center and utility substation use on the property from 2,121,661 square feet to 1,414,440 square feet.

Site Layout and Building Elevations: The applicant has proffered substantial conformance to three conceptual layout options with cross sections demonstrating massing of buildings as seen from the Dulles Greenway and Sycolin Road (CDP Sheets 8, 8A, and 8B). Each option identifies approximate locations of building areas, parking areas, loading areas, and equipment yards (see Figures 2-4). The applicant has also proffered a building rendering depicting how architectural treatments would be seen from adjacent roads (See Figure 5).

Building/Equipment Yard Limitation Zone: The applicant has proffered to limit the locations of buildings and equipment yards to no more than 10 percent of the acreage within 75 feet to 100 feet from Sycolin Road.

Figure 2. Conceptual Layout – Option 1 (Sheet 3)

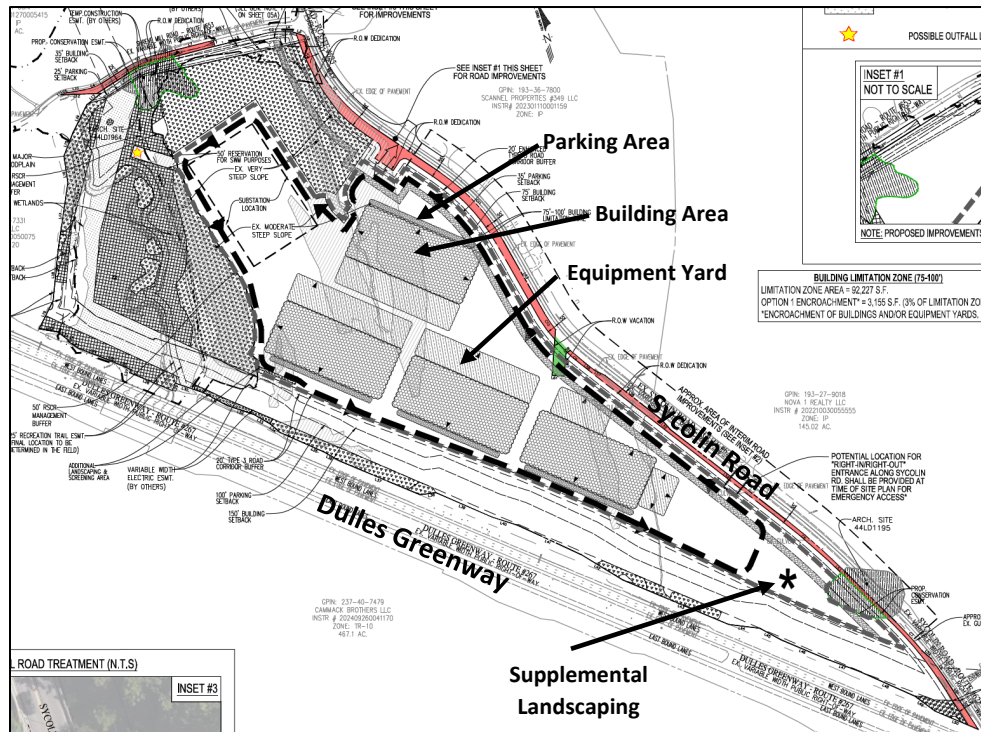
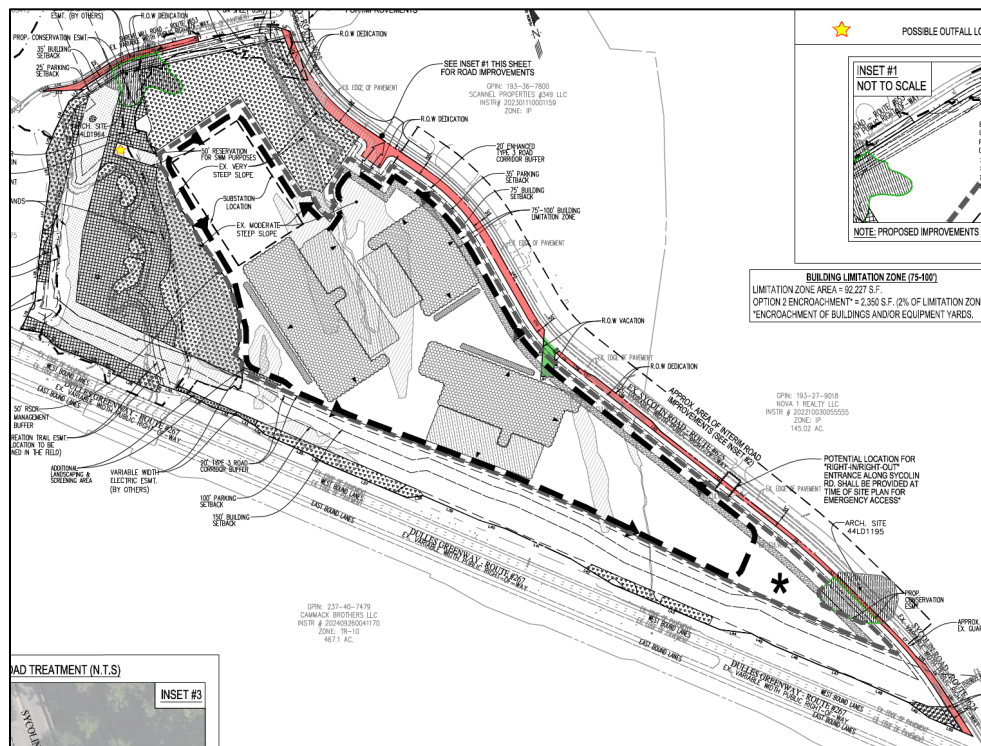


Figure 3. Conceptual Layout – Option 2 (Sheet 3A)



proffered Tier 4 generators, or Tier 2 generators with selective catalytic reduction systems, or generators with equivalent or lower emission rates.

Additional Landscaping / Screening: The applicant has proffered use of existing trees and native shrubs, grasses, and perennials to provide additional screening between adjacent roads and buildings on the east end of the campus. Additional landscaping areas have been proffered to screen the most visible views of buildings from the Dulles Greenway.

Noise: The applicant has proffered to limit noise from data center and associated mechanical equipment to 55 dB(A) as measured at the lot line of any contiguous lot that permits single-family dwellings, including lots across the Dulles Greenway south of the subject property. The proffer includes commitments to pre- and post-construction noise studies to determine appropriate mitigation if needed.

Sycolin Creek Discharge: The applicant has proffered to restrict stormwater discharge directly into Sycolin Creek without first passing through an upstream management facility determined in coordination with the Department of Building and Development.

Power Restrictions: The applicant has proffered to restrict power demand to no more than 300 megawatts for five years and to monitor and report energy withdrawn from the electric grid for three years following full power demand of the facility.

EV (Electric Vehicle) Charging Stations: The applicant has proffered to upgrade EV charging stations from Level 2 to Level 3 to reduce charging times and to require two charging stations at each building.

Natural Gas Generators: The applicant has proffered to perform a feasibility analysis regarding use of natural gas generators on the property.

Water Restrictions: The applicant has proffered to lower water usage cooling systems, such as air-cooled chiller plants or closed-loop cooling systems.

Informational Update: The Board requested additional information from staff regarding building heights and setbacks, parking setbacks and vegetative buffers along Sycolin Road compared to the applicant's proposal. The requested analysis is provided as Figure 6 and Table 1. Table 1.

Figure 6. Properties Fronting Sycolin Road – TLI Place Type

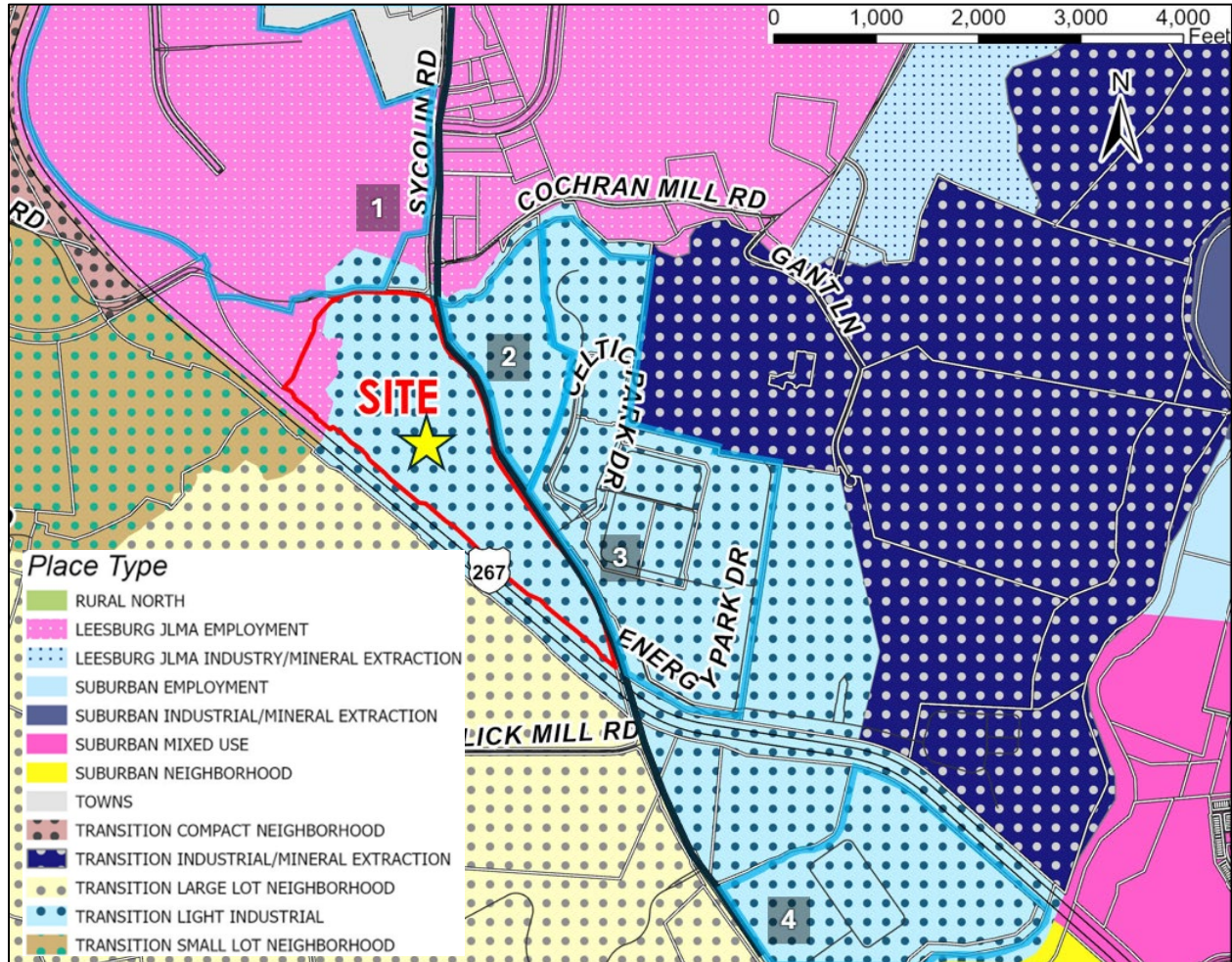


Table 1. Building Heights, Setbacks, and Buffers Adjacent to Sycolin Road							
	Site	Building Height	Building Setback Requirement	Building Setback Actual	Parking Setback	Parking Actual	Road Corridor Buffer Provided
1	Leesburg West	52'-100'	75'	More than 500'	35'	NA	Type 2
2	Sycolin Road Distribution Facility	45'	75'	At least 170'	35'	35'	Enhanced Type 2 (80 evergreen trees beyond Type 2 requirement)
3	Loudoun West/ Stonewall Creek Business Park	60'-100'	75' with a 100' TCA	280'	35'	202'	Type 3 in 100' TCA
4	True North	27'-56'	75'	223'	35'	140'	Type 3 (evergreen addition)
*	Greenlin Park	55'	75'	75'	35'	NA	20' Enhanced Type 3

ISSUES: There are no outstanding issues. Amendments to the application sufficiently address previously identified issues regarding architectural design, site design, and building height. The applicant has proffered conceptual layout options, streetviews, and a building rendering to address concerns regarding architectural design and to mitigate visual impacts from the Dulles Greenway and Sycolin Road. Further, although the applicant has not committed to the previously recommended 36-foot building height limitation, the revised proposal employs retaining walls to reduce perceived building heights and commits to supplemental plantings to further screen and visually separate buildings, reducing the overall visual impact from adjacent roads, consistent with design policies of the 2019 GP.

FISCAL IMPACT: There are no outstanding issues regarding fiscal impacts. The application does not present impacts to airports, housing, schools, parks, playgrounds, recreational areas, or other public services.

ALTERNATIVES:

1. The Board may approve the application as recommended by the Commission and staff, subject to the Proffers (Attachment 1), and based on the Findings for Approval (Attachment 2).
2. The Board may forward the item to a future business meeting for further discussion.

DRAFT MOTIONS:

1. I move that the Board of Supervisors approve LEGI-2023-0059, Greenlin Park: ZMAP-2022-0024, subject to the Proffer Statement dated February 13, 2025, and based on the Findings for Approval provided as Attachments 1 and 2 to the February 19, 2025, Board of Supervisors Business Meeting Action Item.

OR

2. I move an alternate motion.

ATTACHMENT(S):

1. Proffer Statement (February 13, 2025)
2. Findings for Approval
3. Concept Development Plan (February 12, 2025)
4. Applicant Response Letters (January 2, 2025; October 30, October 18, September 26, 2024)

PROFFER STATEMENT

Greenlin Park

LEGI-2023-0059

ZMAP-2022-0024

December 29, 2022

Revised July 18, 2023

Revised January 5, 2024

Revised April 12, 2024

Revised June 7, 2024

Revised August 1, 2024

Revised September 26, 2024

Revised October 18, 2024

Revised October 30, 2024

Revised October 31, 2024

Revised January 2, 2025

Revised January 31, 2025

Revised February 12, 2025

Revised February 13, 2025

Cammack Brothers, LLC, the record owner (referred to herein as the “Owner”) of the property identified as Loudoun County PIN 193-26-9921 consisting of a total of approximately 83.71 acres (the “Property”), on behalf of itself and its successors in interest, hereby voluntarily proffers, pursuant to Section 15.2-2303 of the Code of Virginia (1950), as amended, that in the event the Board of Supervisors of Loudoun County, Virginia, approves this Zoning Map Amendment application, ZMAP-2022-0024 (the “Application”), to rezone the Property from the Transitional Residential – 10 (TR-10) zoning district and the Joint Land Area Management – 20 (JLMA-20) zoning district to the Planned Development – Industrial Park (PD-IP)(IP)) zoning district, development of the Property shall be in substantial conformance with the Concept Development Plan identified in Proffer I.A. below and attached hereto as Exhibit A, and the conditions set forth in this Proffer Statement (“Proffers”). All proffers made herein are contingent upon the approval of this ZMAP-2022-0024 by the Board of Supervisors of Loudoun County, Virginia. As used herein, the term “County” refers to the Board of Supervisors of Loudoun County, Virginia, or to the applicable Loudoun County government department, staff, or official enabled with authority to act on the County’s behalf, within the context of the particular proffer provision. This application was processed under the land use and development regulations prescribed in the Revised 1993 Zoning Ordinance pursuant to the ZOR Grandfathering Resolution dated December 13, 2023

All references in these Proffers to subdivision, subdivision plat, or record plat shall be deemed to include condominium or condominium plat or any other document or mechanism that legally divides the Property into separately transferable units of ownership. Any obligation imposed herein that must be performed prior to, in conjunction with, or concurrently with first or other subdivision or record plat approval shall be deemed to be required to be performed prior to the recordation of any such condominium declaration or plat or other similar document that would have the legal effect of dividing the Property into separately transferable units of ownership.

As used in these Proffers, the term site plan shall include any application for approval of a site plan or site plan amendment in accordance with applicable County ordinances and the term CPAP shall include any application for approval of construction plans and profiles or revision to construction plans and profiles in accordance with applicable County ordinances. All proffered improvements shall be shown in detail on a site plan or CPAP, such detail shall include dimensions, location, construction materials, and any other matters needed to understand the installation/construction of such proffered improvements. Proffered improvements shown on a site plan shall be bonded prior to approval of said site plan; proffered improvements shown on CPAPs shall be bonded prior to approval of the record plat associated with such CPAP, or as otherwise required by applicable County regulation or procedure. All land development applications, including zoning permit applications, for development of all or any portion of the Property shall identify said applications or permits as being subject to the Proffers of this Zoning Map Amendment (ZMAP-2022-0024).

When any plan submission, signal warrant analysis submission, noise or other impact study submission, bonding, dedication, conveyance, construction, completion of construction, opening of a facility or infrastructure to traffic or use, payment of cash, or any other act or activity required in these Proffers is required to be performed, submitted, recorded, paid, commenced and/or completed prior to the issuance of any certificate of occupancy, the said certificate of occupancy shall not be issued until the Owner has provided written documentation to the Loudoun County Building and Development (“B&D”) or Zoning Administration staff that the said requirement has been satisfied, or documentation from B&D or Zoning Administration staff that the said requirement is no longer a prerequisite for issuance of such certificate of occupancy.

I. CONCEPT DEVELOPMENT PLAN & DEVELOPMENT SCOPE

- A. Concept Development Plan. The development of the Property shall be in substantial conformance with the Concept Development Plan (the “CDP”), hereby defined as Sheets 01, 03, 03A, 03B, 03C, 04, 05, 05A, 07, 08, 08A, and 08B of the plan set titled “GREENLIN PARK ZMAP-2022-0024, LEGI-2023-0059”, dated January 2023 and revised through February 12, 2025, prepared by Urban, Ltd. and these Proffers. The CDP shall control the development, layout, and configuration of the Property. Owner may make minor adjustments to the location of proposed uses,

facilities, and improvements shown on the CDP as reasonably necessary to address grading; drainage; environmental, cultural, and natural features; development ordinance requirements; and other final engineering considerations; and to accommodate the recommendations of archaeological studies; any such minor adjustments are in substantial conformance with the CDP.

- B. Development Scope. The Property shall only be developed with Data Center uses within the Buildable Area identified on Sheets 03, 03A, and 03B of the CDP and the Utility Substation, dedicated or distribution use, as identified in the location within the Buildable Area shown on Sheets 03, 03A, and 03B of the CDP as “SUBSTATION LOCATION”. The total building square footage permitted for the Data Center use and Utility Substation, dedicated or distribution use shall be limited to 1,414,440 square feet of gross floor area.
- C. Building Height. The maximum height of any buildings on the Property shall not exceed fifty-five feet (55’).

II. BUILDING AND SITE DESIGN

- A. Building Design. The below requirements shall apply to the building design of data center buildings constructed on the Property. For purposes of this proffer, a principal building facade shall be defined as a building elevation facing Sycolin Road and the Dulles Greenway that is identified as a Principal Building Facade on Sheets 03, 03A, and 03B of the CDP (“Principal Building Facade”).
 - a. Building Façade. Unless otherwise specified in this Proffer II, each Principal Building Façade shall incorporate the following design elements:
 - i. A minimum of two distinct exterior surface materials and/or patterns as the primary façade material(s), which may be accomplished using changes in textures, indentations, and/or etching of pre-cast concrete panels, or using a minimum of two different materials listed in Proffer II.A.c.
 - ii. A minimum of one step-back or recessed plane of at least four feet in depth. If a recessed plane is implemented, it shall extend from the ground level to the top of the building. The step-back or recessed plane shall extend horizontally across the Principal Building Façade at a minimum of 25% of the Principal Building Façade.
 - iii. A variation of a minimum of two feet in the parapet and/or wall height of the building or equipment yard screen. The varied parapet or wall

height shall extend horizontally across a minimum of 25% of the Principal Building Façade.

- iv. A minimum of two of the following features shall be included: windows, wall articulation, material changes, color changes, and changes, awnings, and/or canopies.
 - v. Each Principal Building Façade shall be consistent with each other in terms of design, materials, details, and treatment when a building has more than one Principal Building Façade.
- b. Building Entrance. The primary entrance of a building shall be located on a Principal Building Façade and shall be highlighted with an entry feature such as an awning, roof feature, trellis, or other decorative elements to differentiate the primary entrance from the other portions of the design. Such primary building entrance shall include the following features:
- i. Contrast with the surrounding building plane by providing a minimum of two of the following features: tinted glass, painted doors, or recessed or projecting features that will create a shaded effect.
 - ii. A frame feature around the doorways using different materials, or material textures from those utilized on the Principal Building Façade.
- c. Building Materials. Exterior materials and colors shall be of a high quality that show a minimum of two color compositions and/or tones. Building materials for each building on the Property shall be compatible with each other. Exterior building materials shall be factory finished, stained, painted, integrally colored, or otherwise suitably treated. Exterior building materials shall not include highly reflective materials (such as bright aluminum or bright reflective metal) or glossy materials. Exterior building materials may include:
- i. Split face or fluted concrete masonry units (CMU).
 - ii. Factory glazed (CMU).
 - iii. Brick veneer or brick.
 - iv. Stone veneer.
 - v. Insulated glazing and framing systems.
 - vi. Architectural pre-cast concrete panels.
 - vii. Painted or stained site-cast or pre-cast concrete.

- viii. Architectural concrete.
 - ix. Factory finished, standing seam metal roofing (for application to pitched roof system only).
 - x. Architectural metal as building accent.
 - xi. Composite metal panel canopies.
 - xii. Non-vision spandrel glass for windows or other features.
- d. Fenestration. Each Principal Building Façade shall include fenestration as follows:
- i. Fenestration must comprise at least 30% of the total surface coverage area of the Principal Building Façade and located in separate, individual placement or clustered bays. Each placement or bay may count toward no more than 7.5% of such total surface coverage area.
 - ii. The placement pattern of individual or clustered bays of fenestration must be distributed horizontally and vertically across the Principal Building Façade; and
 - iii. The Fenestration must be compatible with the other design, materials, details, and treatment used on the same Principal Building Façade.
- e. Principal Building Façade Consistency. Building elevations or architectural drawings shall be submitted to the Zoning Administrator with the first site plan for each new building on the Property for review and approval to confirm substantial conformance with this Proffer II.A. The Owner shall obtain the Zoning Administrator's approval of the elevations or drawings prior to the approval of the applicable site plan.
- f. Sycolin Road Building Limitation Zone. Along the entirety of the Property's Sycolin Road frontage, within the area identified as the "75' TO 100' BUILDING LIMITATION ZONE" on Sheets 03, 03A, and 03B of the CDP ("Building Limitation Zone"), no more than 10% of Building Limitation Zone can be occupied by buildings and equipment yards.
- g. Equipment Yard. For any Principal Building Façade that is identified for a "Proposed Equipment Yard" on Sheets 03, 03A, and 03B of the CDP, the

building design standards of Proffer II.A.a.i., II.A.a.iii., II.A.a.iv, II.A.a.v., II.A.c.i.-xii., II.A.e., and II.A.f. shall apply. In addition to the building materials included in Proffer II.A.c.i.-xii., building materials such as metal, metal panels, corrugated metal, architectural metal, aluminum, and aluminum panels may also be used for this Principal Building Façade. The remainder of the building design standards of this Proffer II.A. shall not apply to the Principal Building Façade of the Proposed Equipment Yard.

B. Mechanical Equipment.

- a. Ground Level and Roof Top Mechanical Equipment. To minimize the visibility of ground level and roof top mechanical equipment from adjacent public roads, the Dulles Greenway, and adjacent properties, all mechanical equipment, with the exception of generators which are referenced separately in Proffer II.B.b., shall be screened on all four sides by an opaque fence, screen wall or panel, parapet wall, or other screening compatible with those materials used in the exterior construction of the building. The effectiveness of this screening shall be evaluated when viewing the Property from the existing grade of adjacent public roads and the existing grade of adjacent properties. The use of chain link fencing for the purpose of mechanical equipment screening shall be prohibited. Screening of ground level and roof top mechanical equipment shall be shown on each site plan, bonded for installation prior to the approval of said site plan, and installed prior to the issuance of the certificate of occupancy for the building.
- b. Generators. In accordance with the Environmental Protection Agency (“EPA”) standards, all generators shall be Tier 4 generators, or Tier 2 generators with selective catalytic reduction systems, or generators with equivalent or lower emission rates. All generators shall be located at the ground level, or possibly stacked on top of each other, but shall be prohibited from being located on the roof of the building. All generators shall be screened by an opaque screening treatment that shall be installed in a manner consistent with the Equipment Yard building design standards included in Proffer II.A.g. above. Screening for generators shall be shown on each site plan, bonded for installation prior to the approval of said site plan, and installed prior to the issuance of the certificate of occupancy for the building.
- c. Notwithstanding the requirements of this Proffer II.B, ground level and roof top mechanical equipment and generators located in a manner that has no adverse impact on adjacent roads and adjacent properties, as determined by the

Zoning Administrator prior to installation of the mechanical equipment, shall not be required to be screened.

- C. Enhanced Sycolin Road Buffer. The Owner shall install a 20-foot-wide Enhanced Type 3 Road Corridor Buffer (the “Enhanced Sycolin Road Buffer”) along the Sycolin Road frontage of the Property as shown on Sheet 05A of the CDP as “20’ ENHANCED TYPE 3 ROAD CORRIDOR BUFFER”. The Enhanced Sycolin Road Buffer shall be shown on the first site plan for the Property, bonded for installation prior to the approval of said site plan, and installed prior to the issuance of the first certificate of occupancy for the Property.
- D. Noise. The maximum allowable sound emitted from a data center or its mechanical equipment on the Property, as measured at the lot line of any contiguous lot that permits a single-family dwelling as a principal use, shall be 55 dB(A). For the purpose of this proffer, and in addition to all other lots contiguous with the Property, lots that are located immediately across the Greenway from the Property are considered contiguous lots. The term “contiguous” has that meaning ascribed to it in the Revised 1993 Zoning Ordinance.
 - a. Pre-Construction Noise Study. A noise study of existing conditions on the Property shall be submitted to the Zoning Administrator prior to the approval of the first site plan on the Property and shall be prepared by a professional acoustical consultant or professional engineer verifying the applicable maximum sound level measured at the lot line of any adjacent lot that permits single-family dwelling units as a principal use. Such noise study, and all subsequent noise studies, shall be accompanied by an affidavit or certificate signed by a professional acoustical consultant or professional engineer.
 - b. Post-Construction Noise Study. A noise study of existing conditions at the time of operations for each data center building and associated equipment shall be submitted to the Zoning Administrator within 6 months after the issuance of each certificate of occupancy on the Property and shall be prepared by a professional acoustical consultant or professional engineer verifying the applicable maximum sound level measured at the lot line of any adjacent lot that permits single-family dwelling units as a principal use. Such noise study, and all subsequent noise studies, shall be accompanied by an affidavit or certificate signed by a professional acoustical consultant or professional engineer.
 - c. Noise Mitigation.

- i. Pre-Construction Noise Study Mitigation. If the Pre-Construction Noise Study exceeds 55 dB(A) as measured at the lot line of any adjacent lot that permits single- family dwelling units as a principal use, noise mitigation measures shall be required to achieve conformance with the 55 dB(A) limit. The Owner shall submit to the Zoning Administrator an affidavit or certificate signed by a professional acoustical consultant or professional engineer stating whether noise mitigation measures are required by the noise study and, if so, identify the applicable mitigation measures. The applicable mitigation measures shall be designed in compliance with all mitigation measures identified by the Pre-Construction Noise Study, shown on the first site plan for the Property, bonded prior to approval of said site plan, and installed prior to the first certificate of occupancy on the Property.
- ii. Post-Construction Noise Study Mitigation. If the Post-Construction Noise Study for each building exceeds 55 dB(A) as measured at the lot line of any adjacent lot that permits single- family dwelling units as a principal use, noise mitigation measures shall be required to achieve conformance with the 55 dB(A) limit. Within 60 days after the completion of each Post-Construction Noise Study per Proffer II.D.b., the Owner shall submit to the Zoning Administrator an affidavit or certificate signed by a professional acoustical consultant or professional engineer stating whether noise mitigation measures are required by the noise study and, if so, identify the applicable noise mitigation measures. Said mitigation measures shall be installed within 60 days thereafter and the Owner shall inform the Zoning Administrator in writing that said mitigation measures have been installed. Once installed, a follow-up study for each building will be performed within 60 days to ensure the mitigation measures provide conformance with the 55 dB(A) limit and within 60 days after the completion follow-up study the Owner shall submit to the Zoning Administrator an affidavit or certificate signed by a professional acoustical consultant or professional engineer stating that said measures are in conformance with the 55dB(A) limit.
- iii. The Zoning Administrator may interpret and enforce the Pre and Post Construction Noise Studies and any necessary noise mitigation measures.

III. TRANSPORTATION

- A. Traffic Signal at Sycolin Road Site Entrance. The Owner shall contact DTCI to prepare a first traffic signal warrant study (signal justification report) (the “First Warrant Study”) at the intersection of Sycolin Road and the site entrance to the Property and pay to the County the applicable fee for preparing the First Warrant Study prior to or concurrent with the submission of the first site plan or CPAP that proposes cumulative square footage of data center uses on the Property to exceed 600,000 square feet. If the First Warrant Study determines that the signal is warranted and the First Warrant Study is approved by VDOT, the Owner shall bond said signal prior to the approval of the site plan or CPAP that proposes the cumulative square footage of data center uses on the Property to exceed 600,000 square feet. The Owner shall design and install the traffic signal in accordance with VDOT standards, including crosswalks with pedestrian-activated crossings, prior to the issuance of a certificate of occupancy that will cause the cumulative square footage of data center uses on the Property to exceed 600,000 square feet.

If VDOT recommends an innovative intersection control at the intersection, the Owner shall bond the innovative intersection control prior to the approval of any site plan or CPAP after the First Warrant Study is approved. The Owner shall either (i) agree to design and install the VDOT recommended innovative intersection control in lieu of the traffic signal improvements required by this Proffer III.A on a timeline mutually agreeable to DTCI and the Owner, or (ii) provide a cash in lieu contribution of \$500,000 to the County for the construction of the VDOT recommended innovative intersection control prior to the approval of the first certificate of occupancy that will cause the cumulative square footage of data center uses on the Property to exceed 600,000 square feet. If the warranted intersection improvements (signal or innovative intersection control) are installed by others, the Owner shall contribute \$500,000 to the County within 30 days of written request by the County.

In the event such traffic signal is not warranted and VDOT does not recommend an innovative intersection control as a result of the First Warrant Study as provided above, the Owner shall contact DTCI to prepare a second traffic signal warrant study (signal justification report) (the “Second Warrant Study”) at the intersection of Sycolin Road and the site entrance to the Property and pay to the County the applicable fee for preparing the Second Warrant Study prior to or concurrent with the submission of the first site plan or CPAP that proposes cumulative square footage of data center uses on the Property to exceed 1,060,000 square feet. If the Second Warrant Study determines that the signal is warranted and the Second Warrant Study is approved by VDOT, the Owner shall bond said signal prior to the approval of the site plan or CPAP that proposes the cumulative square footage of data center uses on the Property to exceed 1,060,000 square feet. The Owner shall design and install the traffic signal in accordance with VDOT standards, including

crosswalks and pedestrian-activated crossings, prior to the issuance of the certificate of occupancy for data center uses that will cause the cumulative square footage of data center uses on the Property to exceed 1,060,000 square feet.

If VDOT recommends an innovative intersection control at the intersection instead of a signal, and if right-of-way is available to accommodate such innovative intersection control, the Owner shall bond the innovative intersection control prior to the approval of any site plan or CPAP after the Second Warrant Study is approved. The Owner shall either (i) agree to design and install the VDOT recommended innovative intersection control in lieu of the traffic signal improvements required by this Proffer III.A. on a timeline mutually agreeable to DTIC and the Owner, or (ii) provide a cash in lieu contribution of \$500,000 to the County for the construction of the VDOT recommended innovative intersection control prior to the issuance of the certificate of occupancy that will cause the cumulative square footage of data center uses on the Property to exceed 1,060,000 square feet. If the warranted intersection improvements (signal or innovative intersection control) are installed by others, the Owner shall contribute \$500,000 to the County within 30 days of written request by the County.

In the event the signal is not warranted and VDOT does not recommend innovative intersection control as a result of the Second Warrant Study as provided above, the Owner shall contribute \$500,000 to the County prior to the issuance of the zoning permit that will allow the cumulative square footage of data center uses on the Property to exceed 1,060,000 square feet. If a cash contribution is made to the County pursuant to this proffer, the Owner shall no longer be required to install intersection improvements, and said contribution shall be used for regional road, transportation, or transit projects in the vicinity of the Property.

- B. Sycolin Road Shared Use Path Contribution. The Owner shall provide a one-time payment in the amount of \$387,175.00 to the County at the time of the issuance of the first certificate of occupancy for the Property. This contribution is being provided for the primary purpose of contributing to the cost of the construction of the Sycolin Road shared use path along the Property frontage as a part of the future widening of Sycolin Road but may be used at the County's discretion for construction of public roadway or transportation improvements within the vicinity of the Property.
- C. Sycolin Road Right-of-Way Dedication. Either upon written request from the County to the Owner or prior to approval of the first site plan or CPAP for the Property, whichever is first in time, the Owner shall dedicate to the County, subject to VDOT approval and at no public cost, approximately 102,305 square feet along

the Property's Sycolin Road frontage, to provide for right-of-way as shown on Sheet 03 of the CDP as "R.O.W. DEDICATION", along with all necessary easements including, but not limited to, construction, drainage, and maintenance-related easements, located outside of the right-of-way.

- D. Sycolin Road Right-of-Way Vacation. The Owner shall initiate the application to vacate the approximately 7,077 square foot portion of right-of-way along Sycolin Road as shown on Sheet 03 of the CDP as "R.O.W. VACATION" and shall pay the cost of such vacation of right-of-way. The application, required plats, and legal documents shall be submitted to the County prior to the approval of the first site plan or CPAP application for the Property.
- E. Sycolin Road Entrance Improvements. The Owner shall, subject to the approval of the County and VDOT, design and install improvements to Sycolin Road at no public cost. Such improvements include 1) improvements to meet minimum VDOT lane width and shoulder requirements as shown in Inset #1 on Sheet 03 of the CDP 2) the southbound right turn lane and taper for the Property's entrance on Sycolin Road (the "Property Entrance") as shown in Inset #1 on Sheet 03 of the CDP as "200' RIGHT TURN LANE W/200' TAPER", and 3) the restriping of Sycolin Road to create a northbound left turn lane at the Property Entrance as shown in Inset #1 on Sheet 03 of the CDP as "RE-STRIPING FOR LEFT-TURN LANE". These improvements for the Property Entrance (the "Property Entrance Improvements"), subject to approval of all necessary site plans or CPAPs by the County and VDOT, and any other reviewing authority, and the granting of any other necessary approvals, shall be shown on and bonded prior to approval of the first site plan or CPAP, whichever is first in time, for the Property. The Property Entrance Improvements shall be completed prior to the issuance of the first certificate of occupancy for the Property.
- F. Sycolin Road Interim Improvements. Prior to approval of the first certificate of occupancy on the Property, the Owner shall, subject to the approval of the County and VDOT, design and construct improvements, at no public cost, to the approximate extent of Sycolin Road as shown in Inset #2 on Sheet 03 of the CDP to bring the variable width southbound lane and shoulder up to VDOT standards to provide a consistent 12-foot-wide travel way and six-foot-wide shoulder. Notwithstanding the foregoing, the Owner shall not make any improvements to Sycolin Road that would impact the Dulles Greenway bridge or guardrail.
- G. Shreve Mill Road Right-of-Way Dedication. The Owner shall dedicate to the County, subject to VDOT approval and at no public cost, approximately 15,428 square feet along the Property's Shreve Mill Road frontage, to provide for right-of-

way as shown on Sheet 03 of the CDP as “R.O.W DEDICATION”, along with all necessary easements, including, but not limited to, construction, drainage, and maintenance-related easements located outside of the right-of-way. Such dedication shall be made prior to or concurrent with the approval of the first site plan or CPAP, whichever is first, for the Property.

- H. Shreve Mill Road Treatment. Upon the future closure and abandonment of the Shreve Mill Road connection east of the Dulles Greenway by VDOT, yet not prior to the submission of the first site plan on the Property, the Owner shall, subject to the approval of the County and VDOT, and at no public cost, construct an entrance apron and taper down the curb radius on Shreve Mill Road at its intersection with Sycolin Road as shown on Sheet 03 of the CDP as “SHREVE MILL ROAD TREATMENT” to reduce the entrance width and discourage use (the “Shreve Mill Road Improvements”); provided, however, that the Owner shall not be required to complete the Shreve Mill Road Improvements if the future closure and abandonment of the Shreve Mill Road connection east of the Dulles Greenway occurs later than the approval of the first site plan for the Property.
- I. Electric Vehicle (“EV”) Charging Stations. The Owner shall provide on the Property, in locations chosen by the Owner, a minimum of two Level 3 EV charging stations per building. Such charging stations shall be fully wired and functional. A fee associated with providing the EV charging service may be applicable. The EV charging stations shall be shown on, and bonded prior to approval of, the first site plan for the Property. The two charging stations for each building shall be installed and available for use prior to the issuance of the certificate of occupancy for the applicable building on the Property.
- J. Vehicle Turnaround Lanes. The Owner shall show the Property Entrance and associated turnaround areas and security checkpoint/gate locations on the first site plan for the Property. The vehicle turnaround areas located between any security checkpoint/gate and Sycolin Road shall be bonded prior to approval of said site plan and open to use prior to the issuance of the first certificate of occupancy on the Property.

IV. ENVIRONMENTAL AND DESIGN

- A. Optimized Performance Strategies for Data Center Building. The Owner shall utilize the below performance strategies to reduce energy and water usage associated for any Data Center uses on the Property. Information detailing compliance with this Proffer shall be submitted prior to the approval of each site plan for a data center building on the Property. The Optimized Performance

Strategies shall consist of the following:

- a. Low Water Usage or Liquid Cooling Systems, defined as use of an air-cooled/adiabatic chiller plant and/or liquid to chip (or liquid to liquid) closed loop cooling system to reduce cooling water usage.
 - b. Low Flow Plumbing Fixtures, defined as use of low-flow or ultra-low-flow plumbing fixtures, limited to no more than 0.5 gallons per minute (“gpm”) for faucets, 1.28 gallons per flush (“gpf”) for water closets, 0.5 gpf for urinals for all restrooms.
 - c. LED light fixtures including advanced zoned lighting controls with occupancy sensors.
 - d. Building Management System, consisting of a computer system that monitors and controls the building's physical environment, including temperature, humidity levels, and air quality sensors.
 - e. A minimum of two strategies developed for Leadership in Energy and Environmental Design (LEED) by the US Green Building Council, or equivalent environmental strategies, proposed by the Owner and deemed acceptable by the Zoning Administrator.
 - f. Power usage on the Property shall be restricted to no more than 300 megawatts (“Full Power”) during times of peak grid usage, as determined by the local distribution company or transmission provider, whichever is applicable, for a period of five years beginning on the date of the approval of this ZMAP-2022-0024. During this five-year period, the Owner shall report its energy withdrawn from the grid to the Zoning Administrator on an annual basis.
 - g. Energy withdrawn from the electric grid will be monitored by the Owner at least every quarter hour and will be reported to the Zoning Administrator on an annual basis for three years beginning one year after initially reaching Full Power. The purpose of this monitoring commitment is to reasonably minimize the use of electricity from the grid at times of peak grid demands.
- B. Low-Impact Development (LID). The Owner shall provide a minimum of five volume reducing Low Impact Development (“LID”) Best Management Practices to treat stormwater from the project as specified by the VA BMP Clearinghouse and may include, but shall not be limited to, water quality swales, bioretention facilities/rain gardens, sheet flow to vegetated buffers, permeable pavement for

parking spaces, or any alternative LID practice proposed by the Owner and deemed by B&D to be acceptable. Subject to approval by B&D, said LID measures, together with other qualifying stormwater management facilities on the Property that comply fully with the VA Stormwater Management regulations, shall either achieve a minimum of eighty-five percent of the total required phosphorous nutrient reductions on-site before pursuing the use of offsite compliance options, or provide an additional LID for a total of six LIDs if the eighty-five percent of the total required phosphorous nutrient reductions cannot be achieved. Notwithstanding the foregoing, the Owner shall provide stormwater treatment measures which achieve a minimum of eighty percent of the total required phosphorous reductions onsite. The location of the LID practices shall be shown on the first site plan or CPAP, whichever is first, for the Property.

- C. Discharges into the Sycolin Creek. Stormwater outfalls, whether natural or man-made, shall be permitted to drain into the Sycolin Creek provided that runoff discharged through such outfalls complies with the standards in Proffer IV.B. All man-made stormwater outfalls constructed during development of the Property shall be designed using principles of Regenerative Stormwater Conveyance (P-CNV-04) as described in the Virginia Stormwater Management Handbook, Natural Channel Design, or a combination of these and other strategies as approved by B&D. The location of the stormwater outfalls shall be shown on the first site plan or CPAP, whichever is first, for the Property. Under no circumstances shall any use on the Property discharge stormwater directly into the Sycolin Creek without passing through an upstream facility such as naturalized channels or such other facilities as approved by B&D.
- D. Foundation Plantings. The elevations of all building facades facing public roadways, shall incorporate foundation plantings. These plantings shall evergreen shrubs, deciduous shrubs, grasses, perennials, and/or groundcovers. The measurement for the required plants will be fifty percent of the façade's length, excluding any entrance walks that run perpendicular to the façade and any doorways. The foundation plantings shall be generally arranged in two rows along the façade, in either formal geometric, irregular, or naturalistic arrangements, to be determined at the time of site plan. These foundation plantings shall be in addition to any required landscape buffers and parking lot landscaping. The foundation plantings for each building requiring such plantings shall be shown on and bonded prior to approval of the first site plan for the Property, and installed prior to the issuance of the first certificate of occupancy for each building.
- E. Native Species. The Owner shall use eighty percent Virginia native species, with emphasis on Northern Virginia native species, for all landscaping throughout the

Property, provided that the Owner reserves the right, in consultation with and approval by the County Urban Forester, to modify as part of site plan approval, including any site plan amendment, the exact species to be used in order to meet Facilities Standards Manual (FSM) requirements, or if some plant materials are not available, or not available in the quantities required for the project, or have been deemed by the County Urban Forester to no longer be appropriate.

- F. Tree Plantings. Trees planted on the Property shall be located at least three feet from hardscapes such as curbs, sidewalks, and pavement to provide ample tree planting space and soil volume. With the exception of trees planted within parking islands and trees counted towards meeting interior parking lot landscaping, all large deciduous trees shall be provided 1,000 cubic feet of uncompacted soil. For trees planted within parking islands and trees counted towards meeting interior parking lot landscaping, a minimum volume of 600 cubic feet of uncompacted soil shall be provided. Where trees are sharing the soil space, the 1,000 and 600 cubic feet requirements may be reduced by thirty-three percent per tree. Soil space will be calculated length x width x height with the assumption that the useable soil depth for the trees would be three feet. The use of alternative means of providing uncompacted soil may be considered at time of final engineering and may include the implementation of structural soils, cantilevered walks, and silva cells. The Owner shall demonstrate compliance with this condition with the first site plan for the Property.
- G. Tree Conservation Area. Within the area identified on Sheet 03 of the CDP as “TREE CONSERVATION AREA” “TCA(s)”, the Owner shall preserve healthy trees provided, however, trees may be removed to the extent necessary for construction of trails, passive recreational amenities, and stormwater management facilities, that are required pursuant to these Proffers and/or shown on approved site plan(s) or CPAP(s) as lying within such TCAs and for the construction of utilities necessary for development of the Property. Notwithstanding the previous sentence, a minimum of eighty percent of the canopy within the TCAs shown on the CDP will be preserved, exclusive of stands of Virginia Pine over 25 years in age. In the event that the eighty percent canopy threshold cannot be achieved within the designated TCAs, such canopy deficit will be recaptured elsewhere onsite in locations to be designated at the discretion of the Owner in consultation with the County. Boundaries of all TCAs shall be clearly marked in the field prior to land-disturbing activities and shall be delineated on each site plan, record plat, and CPAP application containing any portion of a TCA. The Owner shall provide a TCA tabulation demonstrating the initial amount of TCA and the remaining amount after development on the site to be submitted with each site plan or CPAP submission.

If, during construction on the Property, it is determined by the Owner's certified arborist and/or the County that any healthy tree located within the boundaries of the TCAs described in this Proffer has been damaged during construction and will not survive, then, prior to bond release related to any portion of the Property containing or immediately adjacent to such TCAs on the Property, the Owner shall remove each such tree and replace each such tree with two 1-inch caliper native, non-invasive deciduous trees. The species of such replacement trees shall be determined by the Owner's certified arborist or landscape architect in consultation with the County Urban Forester or Zoning Administrator. The placement of the replacement trees shall be proximate to the area of each such damaged tree so removed, or in another area on the Property as requested by the County.

The TCA shall be protected by a Tree Conservation Easement granted to the County and recorded with the applicable record plats. A Deed of Easement, running to the benefit of the County, shall be recorded prior to or concurrent with each record plat, site plan, or CPAP for the Property containing any portion of the TCA. Such deed shall include a provision that prohibits cutting and/or removal of trees in Tree Conservation Easement as shown on the record plat, site plan, or CPAP after construction has been completed by the Owner without specific permission of the County Urban Forester except as necessary to accommodate Forest Management Techniques, performed by or recommended by a professional forester or certified arborist, that are necessary to protect or enhance the viability and regeneration potential of the canopy. Such Management Techniques may include, without limitation, pruning and the removal of vines, invasive species control, and cutting of trees uprooted or damaged by extreme weather conditions, and trees or limbs that are diseased, insect-infested, dead, or are considered a hazard to life or property. The record plat, site plan, or CPAP for each portion of the Property containing a Tree Conservation Easement shall contain a note stating that the removal of trees within a Tree Conservation Easement is prohibited except in accordance with the Deed of Easement for the TCA.

- a. Invasive Species Management. the Owner shall provide invasive species control in the proposed TCAs with a minimum of three treatments over three consecutive years, with the first treatment occurring prior to the issuance of the first certificate of occupancy for the Property. These treatments shall first focus on invasive vines, such as Japanese honeysuckle, then other invasive species using mechanical, chemical or a combination of techniques within the context of an Integrated Pest Management Strategy ensuring labels are followed when and if herbicides are applied. The invasive species treatment strategy must be approved by the County Urban Forester or their designee prior to approval of the first zoning permit on the

Property. The Owner shall provide the Zoning Administrator documentation detailing when the second and third treatments outlined in this Proffer have been completed.

- H. Specimen Tree Preservation. The Owner shall engage a Certified Arborist to prepare a tree preservation plan for the specimen trees (“Specimen Trees”) located within the TCA as shown on Sheet 05 of the CDP. For the purposes of this proffer, the Critical Root Zone (“CRZ”) for these specimen trees shall be increased to one and half times the total diameter of the trees at breast height. A tree preservation plan shall be provided to the County for review and approval prior to the approval of the first site plan or CPAP for the Property. Such tree preservation plan shall identify the tree protection measures that shall be employed to protect the Specimen Trees during construction activities, which measures shall include, without limitation, (i) placing of fencing outside the CRZ of such Specimen Trees if near the limits of disturbance (“LOD”), (ii) avoiding construction activities within such CRZ to the greatest extent possible, and (iii) requiring that construction plans for all permitted improvements on the Property shall clearly define the limits of each CRZ and that the limits of each CRZ shall be clearly marked in the field. If construction activities within the CRZ of the Specimen Trees are unavoidable or unintentional encroachments occur, then the Owner and/or their Certified Arborist will develop a remediation plan to be approved by the County Urban Forester and implemented thereafter. In addition, any utility line that must be located within the CRZ of the Specimen Trees shall be installed using a boring technique supervised by a Certified Arborist. In the event any one of the Specimen Trees are damaged during construction and in the opinion of a Certified Arborist and/or the County Urban Forester cannot be saved, the Owner shall replace the damaged Specimen Tree with four one-inch caliper, native, non-invasive, deciduous trees. The placement of the replacement trees shall be proximate to the area of the damaged Specimen Tree so removed, or in another area as requested by the County Urban Forester or Zoning Administrator.
- I. Reforestation Plantings. The Owner shall submit a reforestation plan, prepared by a Certified Arborist, Urban Forester, or Landscape Architect, in accordance with the reforestation standards set forth in the FSM for the reforestation area identified on Sheet 03 of the CDP. Such reforestation plan shall be submitted at the time of the first site plan or CPAP, whichever is first, for the Property for review and approval by the County Urban Forester or Zoning Administrator and bonded for installation prior to approval of said site plan or CPAP. The approved reforestation plan shall be implemented in accordance with the reforestation standards of the FSM, including the maintenance and restocking provisions, concurrently with the development of each of the said site plans or CPAP prior to issuance of the first

certificate of occupancy for the Property. In the event that the targeted stocking is not achieved, the Owner shall, in consultation with the County Urban Forester or Zoning Administrator, provide a one-time supplemental planting within one (1) year to achieve the full, initial stocking. The Owner shall monitor the reforestation area for a period of five consecutive years after the issuance of the first certificate of occupancy and shall maintain the targeted stocking density with supplemental plantings throughout the maintenance period. On an annual basis during the five consecutive years after the issuance of the first certificate of occupancy, a monitoring report and if required, a supplemental planting plan that restores reforestation area to required stocking density shall be submitted for review and approval to the County Urban Forester or Zoning Administrator demonstrating compliance with this Proffer IV.I.

- J. River and Stream Corridor Resource. Within the areas identified on Sheet 03 of the CDP as “EX. MAJOR FLOODPLAIN and “50’ RSCR MANAGEMENT BUFFER” (collectively the “RSCR”) only “Permitted Uses in the RSCR” such as, but not limited to, trails (including associated infrastructure), utilities, stormwater management facilities, and as further identified in the Loudoun County 2019 General Plan, Chapter 3, RSCR Policy 2, Strategy 2.2. will be permitted (the “Permitted Uses”). To the extent the elevations and/or boundaries of the floodplain on the Property, as identified on the current Floodplain Map of Loudoun County, are altered, relocated, and/or updated as a result of a floodplain study or alteration approved in accordance with the Loudoun County Zoning Ordinance and Chapters 5 and 8 of the FSM, the RSCR, including the Management Buffer shall apply to the relocated floodplain boundary. In the event that the RSCR is encroached, the Owner shall replant open areas within or adjacent to the Major Floodplain in an amount equal to the area of the proposed development that encroaches into the RSCR. Reforestation proposed to mitigate RSCR encroachments associated with the stormwater outfall will be in addition to any reforestation outlined on the CDP. Any areas proposed for reforestation to mitigate these disturbances shall be greater than or equal to the total area disturbed within the RSCR. The Owner shall submit a reforestation plan, prepared by a Certified Arborist, Urban Forester, or Landscape Architect, in accordance with the reforestation standards set forth in the FSM. This reforestation plan shall be submitted at the time of submission of each site plan or CPAP proposing the development of any area that encroaches into the RSCR for review and approval by the County Urban Forester or Zoning Administrator. Each approved reforestation plan shall be implemented in accordance with the reforestation standards of the FSM, including the maintenance and restocking provisions, prior to the issuance of the first certificate of occupancy for any area of the Property subject to an approved site plan or CPAP that shows encroachment into the RSCR.

- K. Archeological Site 44LD1195. If disturbance of Archeological Site 44LD1195 cannot be avoided by development, the Owner shall conduct a Phase I archeological survey of the area. If potentially significant archaeological resources are identified by the Phase I survey, the Owner will complete a Phase II archaeological significance evaluation prior to disturbance. If said Phase II evaluation determines that any identified resources are significant, the Owner shall undertake Phase III data recovery excavations as a means of mitigating adverse impacts to the resource. County preservation staff will be afforded to the opportunity to review and provide comment on Phase II and Phase III research designs prior to the initiation of archaeological fieldwork. The Owner shall also ensure that all significant archaeological remains recovered during such work together with copies of all requisite field notes and other site records will be transferred for permanent curation to the Virginia Department of Historic Resources, and joined with earlier collections recovered from the site.
- L. Archeological Site 44LD1964. If disturbance of Archeological Site 44LD1964 cannot be avoided by development, the Owner shall conduct a Phase II archeological significance evaluation prior to its disturbance. If said Phase II study determines that any identified resources are significant, the Owner shall undertake Phase III data recovery excavations as a means of mitigating adverse impacts to the resource. County preservation staff will be afforded to the opportunity to review and make comment on Phase II and Phase III research designs prior to the initiation of archaeological fieldwork. The Owner shall also ensure that all significant archaeological remains recovered during such work together with copies of all requisite field notes and other site records will be transferred to Loudoun County for permanent curation.
- M. Conservation Easements for Archaeological Sites 44LD1195 and 44LD1964. The Owner shall protect the two archaeological sites located on the Property depicted on Sheets 03, 03A, and 03B of the CDP as “PROP. CONSERVATION EASEMENT” (collectively referred to hereinafter as the “Archaeological Sites”) from inadvertent impact and encroachment by placing a conservation easement(s), suitable in form as determined by the County Attorney’s Office and County Archaeologist, over the Archaeological Sites. The conservation easement(s) shall be recorded in the Land Records prior to the approval of the first site plan or CPAP on the Property, whichever is first in time.
- N. Habitat Study. The Owner shall submit a wood turtle habitat study, herein referenced as the “Habitat Study,” to B&D, the Virginia Department of Conservation and Recreation (“DCR”), and/or the Virginia Department of Wildlife

Resources (“DWR”), prior to the approval of any grading permit, site plan, or CPAPs on the Property, whichever is first in time. B&D may coordinate with DCR and DWR on the review of the Habitat Study. If DCR or DWR finds that a species-specific survey is warranted due to the land disturbing activities on the Property that may affect wood turtle habitats, the Owner shall provide this finding to the B&D and shall perform this species-specific survey and submit it to DCR or DWR, as applicable, with a copy to B&D. If found applicable by DCR or DWR, the Owner shall implement any recommended protective measures prior to the approval of the first grading permit on the Property. If the limits of clearing and grading change on the Property, the Owner shall provide a copy of the Notice of Planned Change (“NOPC”) that has been submitted to the Virginia Department of Environmental Quality (“DEQ”) and/or the U.S. Army Corps of Engineers (“USACE”), as applicable, to B&D. Upon approval by DEQ/USACE of the NOPC, a copy of the updated Virginia Water Protection Permit issued by DEQ shall be provided to B&D.

- O. Solar Tree and Solar/Wind Light Poles. The Owner shall install a solar tree and at least five solar/wind light pole(s) (the “Solar Facilities”) per building on the Property. The exact number and location of the Solar Facilities shall be shown on the first site plan for the Property, bonded with said site plan, and installed prior to the first certificate of occupancy on the Property.
- P. Pollinator Meadow Plantings Within Utility Easement. Subject to approval by the utility provider, the Owner shall plant the easement area shown on Sheet 05A of the CDP as “APPROXIMATE AREA OF ELECTRIC EASEMENT POLLINATOR PLANTINGS” (“Pollinator Planting Areas”) with a native, locally appropriate meadow seed mix, and provide interspersed pollinator garden plantings totaling at least 80% of the square footage depicted as Pollinator Planting Areas within the transmission line, utilizing a mix of native, transmission line appropriate shrubs, containerized perennials, and meadow seed mix. These plantings shall receive site preparation and be planted at a density sufficient to achieve at least 90% coverage of native plants. At time of first site plan or CPAP, whichever is first, the Owner shall submit a Native Pollinator Planting Management Plan for review and approval by the Natural Resources Team that addresses site preparation, species selection, planting/establishment, maintenance, and invasive species control. The Pollinator Planting Areas shall be shown, and plant species within the Pollinator Planting Areas listed, on the first site plan or CPAP for the Property, bonded for installation with the County prior to approval of said site plan or CPAP, and installed during a planting season between March through May or September through November that occurs prior to the issuance of the first certificate of occupancy on the Property. The Owner shall monitor the pollinator planting areas

for a period of five consecutive years after the issuance of the first certificate of occupancy and shall maintain the targeted stocking density with supplemental plantings throughout the maintenance period. On an annual basis during the five consecutive years after the issuance of the first certificate of occupancy, a monitoring report and, if required, a supplemental planting plan that restores pollinator planting areas to the required density shall be submitted for review and approval to B&D or the Zoning Administrator demonstrating compliance with this Proffer. The Pollinator Planting Areas shall be maintained by the Owner.

- Q. Natural Gas-Powered Generator Analysis. The Owner shall perform an analysis to determine the feasibility of installing natural gas-powered generators on the Property. Among other factors, this analysis shall take into consideration the proximity of an existing natural gas line to the Property, the practicality of extending a natural gas line to the Property, the reliability standards needed to satisfy the demands of an end user, applicable environmental regulations and requirements, and the site constraints on the Property in accommodating natural gas-powered generators. This analysis shall be submitted to the County prior to the approval of the first site plan on the Property. The Owner shall consider the results of this analysis when installing generators on the Property, but shall not be required to install natural gas-powered generators on the Property.
- R. Supplemental Landscaping. The Owner shall install supplemental landscaping in the area identified on Sheets 03, 03A, 03B, and 05 of the CDP as “SUPPLEMENTAL LANDSCAPING AREA (24,000 S.F. MIN.; SEE PROFFER IV.R)” (“Landscaping Area”). The Landscaping Area shall include any combination of existing trees and meadow-style plantings consisting of container-grown, native pollinator shrubs, grasses, and/or perennials; and/or seed mixes (“Landscaping Plantings”). The Landscaping Plantings shall receive site preparation and be planted at a sufficient density to achieve at least 90% coverage of native plants. At time of the submission of the first site plan or CPAP, whichever is first in time, the Owner shall submit to the Urban Forester for review and approval, a tree survey to determine the viability of the existing tree cover; and a landscaping plan that addresses site preparation, species selection and quantities, planting/establishment, maintenance, and invasive species control specific to the Landscaping Area. The Landscaping Area and Landscaping Plantings shall be shown on the first site plan or CPAP for the Property, whichever is first in time, bonded for installation prior to the approval of said site plan or CPAP, and installed prior to the approval of the first certificate of occupancy for the Property. The Owner shall monitor the Landscaping Area for a period of five consecutive years after the issuance of the first certificate of occupancy and shall maintain the targeted stocking density with supplemental plantings throughout the maintenance period.

On an annual basis during the five consecutive years after the issuance of the first certificate of occupancy, a monitoring report and, if required, a supplemental planting plan that restores the Landscaping Area to the required density shall be submitted for review and approval to B&D or the Zoning Administrator in order to demonstrate compliance with this Proffer. The Landscaping Plantings shall be maintained by the Owner.

- S. Additional Landscaping and Screening Area. The Owner shall install a minimum 10-foot-wide Type A Road Corridor Buffer (the “Enhanced Greenway Buffer”) along the Dulles Greenway frontage of the Property as shown on Sheets 03, 03A, and 03B of the CDP as “ADDITIONAL LANDSCAPING & SCREENING AREA”. The Enhanced Greenway Buffer shall be shown on the first site plan or CPAP for the Property, whichever is first in time, bonded for installation prior to the approval of said site plan or CPAP, and installed prior to the issuance of the first certificate of occupancy for the Property.

V. PROPERTY AMENITIES

- A. Bicycle Racks. The Owner shall provide a minimum of two inverted U style bicycle racks at the entrance of each building located on the Property, each of which shall accommodate a maximum of two bicycles. Each bicycle rack shall be shown on and bonded prior to the approval of the site plan for each building on the Property. Each bicycle rack shall be installed and available for use prior to the issuance of each certificate of occupancy for the associated building on the Property.
- B. Internal Pedestrian Connections. The Owner shall construct a network of pedestrian asphalt trails and concrete sidewalks throughout the Property that will provide connections between external roadways, internal roadways and driveways, parking areas, building entrances, and the Outdoor Gathering Space located within the Property for the use of customers and employees (“Internal Pedestrian Connections”). The Internal Pedestrian Connections shall be a minimum of five feet in width. The locations of these Internal Pedestrian Connections shall be shown on and bonded prior to the approval of the first site plan or CPAP, whichever is first, for the Property. The Internal Pedestrian Connections shall be constructed in accordance with the FSM and completed prior to the issuance of the first certificate of occupancy on the Property.
- C. Outdoor Gathering Space. The Owner shall provide an area measuring a minimum of 600 square feet in size for the use of customers and employees on the Property (“Outdoor Gathering Space”). A minimum of four benches and two picnic tables shall be provided in said Outdoor Gathering Space. The Outdoor Gathering Space

shall be accessed by at least one of the Internal Pedestrian Connections on the Property pursuant to Proffer V.B. The benches and tables in the Outdoor Gathering Space shall be shown on and bonded prior to the approval of the first site plan or CPAP, whichever is first, for the Property. The benches and tables shall be installed prior to the issuance of the first certificate of occupancy on the Property.

- D. Sycolin Creek Trail Easement. The Owner shall dedicate, by Deed approved by the County Attorney and at no public cost, a 25-foot-wide public access easement generally located along the east side of Sycolin Creek in the area identified on Sheet 03 of the CDP as the “25’ RECREATION TRAIL ESMT. (FINAL LOCATION TO BE DETERMINED IN THE FIELD)” (the “Sycolin Creek Trail Easement”). The Deed shall include provisions that the Sycolin Creek Trail Easement shall generally remain in a natural state. The Deed shall include provisions that 1) the Sycolin Creek Scenic Trail easement area shall be used as a multipurpose trail primarily for walking and hiking; 2) equestrian and mountain bike (non-motorized) uses may be considered as optional recreational uses; 3) only minor clearing is permitted and natural surface trails are to be constructed in the easement, with the exception of wooden footbridges if required and amenities such as signage, trail markers, and benches; 4) there will be no lighting of the trail, no paved surfaces, no bicycles, and no camping permitted within the easement area; and 5) any encroachments within the easement shall be limited to the location of utilities and road crossings. The Sycolin Creek Trail Easement shall not conflict with any areas subject to existing or proposed easements, reservations, or dedications. The location of the Sycolin Creek Trail Easement shall be field located in coordination with County staff and said easement shall be shown on the first site plan or CPAP, whichever is first, for the Property and granted to the County within 90 days of the County’s request, or prior to the approval of the first site plan or CPAP for the Property, whichever is later.

VI. FIRE, RESCUE AND EMERGENCY SERVICES

- A. One-Time Contribution. The Owner shall make a one-time cash contribution prior to approval of each zoning permit on the Property in the amount of Twenty-Six Cents (\$0.26) per square foot of non-residential floor area which shall be paid to the County for distribution by the County to the volunteer fire and rescue companies providing service to the Property. The amount of the contribution will be adjusted on a yearly basis from the base year of 2025 and change effective each January 1 thereafter, in accordance with changes to the Consumer Price Index, for all urban consumers (CPI-U), 1982-1984=100 (not seasonally adjusted), as published by the Bureau of Labor Statistics, U.S. Department of Labor, for the Washington-Arlington-Alexandria, DC-VA-MD-WV Consolidated Metropolitan Statistical Area (the “CPI”). The contributions will be used for capital improvements and

apparatus acquisition necessary for fire and rescue operations by volunteer companies. Contributions pursuant to this paragraph shall be divided equally between the fire and rescue companies providing service to the Property. Notwithstanding the foregoing, if at the time of the application for a zoning permit, the primary servicing fire and rescue companies do not utilize, to any significant extent, either volunteer staff or apparatus owned by a volunteer organization, then the Owner may elect to make no contribution. If only one of these services has ceased to utilize significant volunteer staff and apparatus, then the contribution shall be halved and shall be provided to the remaining company.

VII. ANNUAL ADJUSTMENT

- A. With the exception of the fire and rescue contribution, which is subject to a separate annual adjustment provision as specified in Proffer VI. of these Proffers, all other monetary contributions set forth in these Proffers shall be adjusted on a yearly basis from the base year of 2025 and change effective each January 1 thereafter, in accordance with changes in the CPI.

VIII. PUBLIC UTILITIES

- A. Water and Sewer. The Property shall be served by public central water supply and public central sanitary sewer systems. The Owner shall construct and install all water and sewer extensions to the Property and shall provide all connections necessary for development of the Property, at no cost to the County or to Loudoun Water, and such extensions and connections shall be constructed and installed in accordance with Loudoun Water standards. The Owner shall acquire, at no public cost, any offsite easements, if needed, to extend public water and/or sanitary sewer lines to the Property and shall dedicate such easements to Loudoun Water at no cost to the County or to Loudoun Water.

The undersigned hereby warrant that all of the owners with any legal interest in the Property have signed these Proffers, that no signature from any additional party is necessary for these Proffers to be binding and enforceable in accordance with their terms, that they, together with the others signing this document, have full authority to bind the Property to these Proffers, and that these Proffers are entered into voluntarily.

[SIGNATURE PAGE FOLLOWS THIS PAGE]

CAMMACK BROTHERS, LLC

BY: _____
NAME:
TITLE:

COMMONWEALTH OF VIRGINIA
COUNTY OF LOUDOUN: to-wit:

The foregoing instrument was acknowledged before me, this _____ day of _____, 2025, by _____.

Notary Public

My Commission Expires: _____

My Notary Registration Number: _____

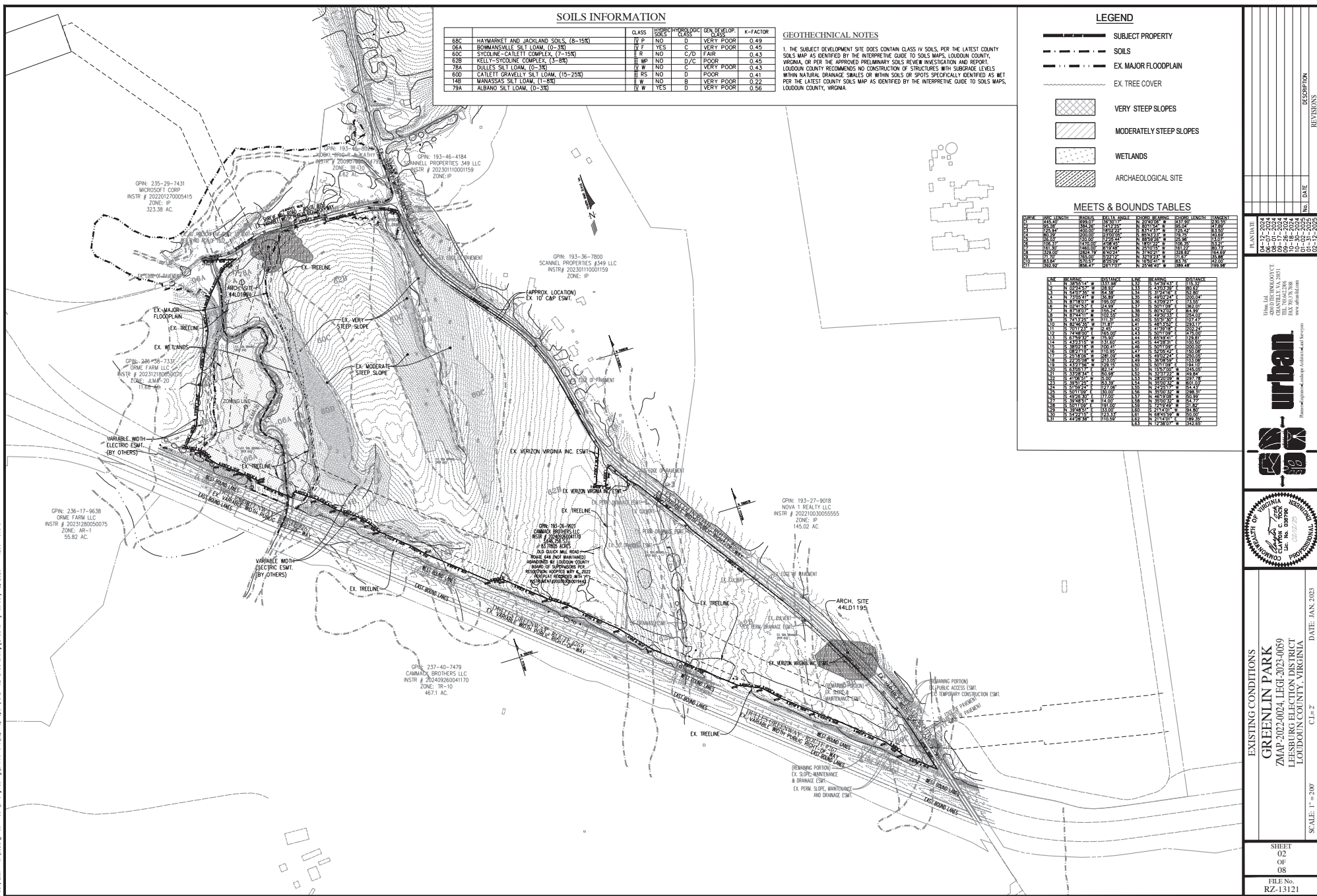
Exhibit A

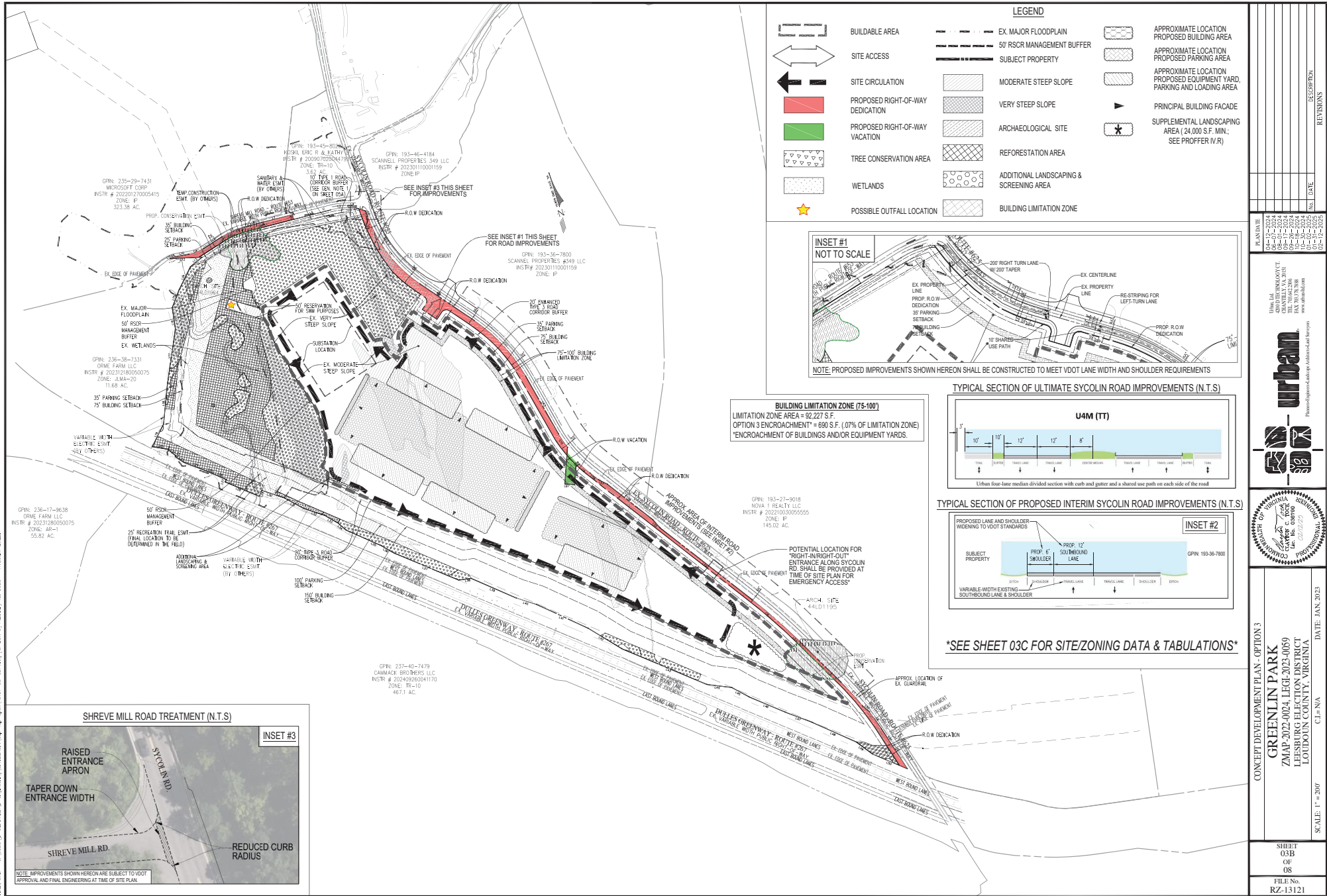
Concept Development Plan

FINDINGS FOR APPROVAL
LEGI-2023-0059, Greenlin Park: ZMAP-2022-0024

1. The proposal to develop data center uses on the subject property is consistent with the land use policies of the Transition Light Industrial Place Type of the *Loudoun County 2019 General Plan* (2019 GP), which support data centers as a core use; and
2. The proposal reduces perceived building heights through use of retaining walls and commits to supplemental plantings to further screen and visually separate buildings, reducing the overall visual impact from adjacent roads consistent with design policies of the 2019 GP; and
3. The proposal proffers improvements to Sycolin Road consist with the *Loudoun County 2019 Countywide Transportation Plan* (2019 CTP); and
4. The applicant has committed to utilize performance strategies to reduce energy and water usage.

Attachment 3





GENERAL NOTES:

1. THIS APPLICATION IS SUBJECT TO THE GRANDFATHERING RESOLUTION ADOPTED BY THE BOARD OF SUPERVISORS ON DECEMBER 12, 2023, AND THE OVERALL PROPERTY IS BEING PROCESSED UNDER THE REVISED 1993 LOUDOUN COUNTY ZONING ORDINANCE (R20).
2. ALL NEW UTILITY DISTRIBUTION LINES SHALL BE PLACED UNDERGROUND.
3. INTERM SYCOLIN ROAD IMPROVEMENTS AS IDENTIFIED ON SHEET 03 SHALL EXTEND WEST FROM THE PROPOSED SITE ENTRANCE TO THE START OF THE OVERPASS GUARDRAIL LOCATED ON THE SOUTH SIDE OF SYCOLIN ROAD.
4. FINAL LOCATION OF THE SECONDARY "RIGHT-IN/RIGHT-OUT" ENTRANCE ALONG SYCOLIN ROAD SHOWN ON SHEETS 03-03B SHALL BE PROVIDED AT TIME OF SITE PLAN FOR EMERGENCY ACCESS.

SITE/ZONING DATA & REQUIREMENTS :

1. THE SUBJECT PROPERTY TO BE REZONED CONTAINS 3,646,758 S.F. OR 83.71 AC. OF GROSS LAND.
- 1.1) PROPOSED R.O.W DEDICATION = - 117,213 S.F. OR 2.70 AC. (102,365 S.F. ON SYCOLIN RD., 15,428 S.F. ON SHREVE MILL RD.)
- 1.2) PROPOSED R.O.W VACATION = + 7,077 S.F. OR .16 AC.
- 1.3) THE SUBJECT PROPERTY CONTAINS 3,536,102 S.F. OR 81.17 AC. OF NET LAND
- *SEE TABLE 01 ON THIS SHEET FOR ZONING AREA TABULATION
2. THE SUBJECT PROPERTY CONTAINS 1,745,277 S.F. OR 40.06 AC. OF BUILDABLE LAND.
3. WATER AND SEWER SERVICE TO BE PROVIDED BY: LOUDOUN WATER.
4. SEE THIS SHEET FOR METES AND BOUNDS LINE TABLE.
5. THE SUBJECT PROPERTY IS CURRENTLY ZONED TR-10 AND JLM-A-20.
6. PROPOSED REZONING: "PLANNED DEVELOPMENT - INDUSTRIAL PARK (INDUSTRIAL PARK) PD-P (P)", THE PROPOSED REZONING WILL BE UNDER THE REVISED 1993 LOUDOUN COUNTY ZONING ORDINANCE.
7. PROPOSED USE: DATA CENTER, DATA CENTER MECHANICAL EQUIPMENT, AND UTILITY SUBSTATION.
8. F.A.R (MAX. ALLOWABLE): 3,536,102 S.F. (NET SITE AREA) X 0.60 = 2,121,661 S.F. PER SECTION 4-506(C).
9. BUILDING HEIGHT (MAX. ALLOWABLE): 60' PER SECTION 4-506(B).
10. LOT COVERAGE (MAX. ALLOWABLE): 3,536,102 S.F. (NET SITE AREA) X 0.45 = 1,591,245 S.F. PER SECTION 4-506(A).
11. YARD REQUIREMENT PER 4-505(B):
- 11.1) ADJACENT TO ROADS 4-505(B)(1)*,***
- DULLES GREENWAY - RTE 267 (PRINCIPAL ARTERIAL)
- 11.1.1. 15' BUILDING SETBACK
- 11.1.2. 10' PARKING SETBACK
- SYCOLIN RD - RTE 629 (MAJOR COLLECTOR)
- 11.1.3. 75' BUILDING SETBACK
- 11.1.4. 35' PARKING SETBACK
- SHREVE MILL RD - RTE 653
- 11.1.5. 35' BUILDING SETBACK
- 11.1.6. 25' PARKING SETBACK
- 11.2) ADJACENT TO AGRICULTURAL AND RESIDENTIAL DISTRICTS AND LAND BAYS ALLOWING RESIDENTIAL USES 4-506(B)(2).
- 11.2.1. 75' BUILDING, OUTDOOR STORAGE AREA FOR COLLECTION OF REFUSE & LOADING AREA SETBACK
- 11.2.2. 35' PARKING SETBACK
- 11.3) ADJACENT TO OTHER NONRESIDENTIAL DISTRICTS 4-506(B)(3)*,***
- 11.3.1. 15' BUILDING, OUTDOOR STORAGE & LOADING AREA SETBACK
- 11.3.2. 15' PARKING SETBACK
- 11.4) YARD BETWEEN BUILDINGS 4-506(B)(4)**
- (A). WHERE INDIVIDUAL LOTS OR BUILDING SITE ARE PROVIDED:
- 11.4.1. 30' BUILDING SETBACK
- 11.4.2. 30' PARKING SETBACK
- (B). WHERE THERE IS MORE THAN ONE BUILDING ON AN INDIVIDUAL LOT OR BUILDING SITE:
- 11.4.3. 25' BUILDING SETBACK
- 11.4.4. 25' PARKING SETBACK

* NO OUTDOOR STORAGE AREAS FOR COLLECTION OF REFUSE, OR LOADING SPACE SHALL BE PERMITTED IN SUCH SETBACKS.

** COVERED WALKWAYS CONNECTING BUILDINGS, OR CONNECTING BUILDINGS WITH PARKING AREAS, SHALL BE PERMITTED IN SUCH YARDS.

*** UNLESS A GREATER BUFFER YARD OR SETBACK IS REQUIRED BY SECTION 5-1400.

12. LANDSCAPE OPEN SPACE (MIN. REQUIRED): 1,745,277 S.F. (BUILDABLE LAND) X 0.20 = 349,055 S.F. OR 8.01 AC PER SECTION 4-707(B)
13. BUFFER REQUIREMENTS PER 5-664(C)(2).
- 13.1) ADJACENT TO ROADS (MAJOR COLLECTORS): 20' TYPE 3 ROAD BUFFER (95 P.U./100 L.F. OF R.O.W)
- 13.2) ADJACENT TO ROADS (PRINCIPAL ARTERIAL): 20' TYPE 3 ROAD BUFFER (95 P.U./100 L.F. OF R.O.W)
14. LIGHTING AND SCREENING PER 5-664(B) & 5-664(C).

14.1. SCREENING OF MECHANICAL EQUIPMENT: GROUND LEVEL AND ROOF TOP MECHANICAL EQUIPMENT SHALL BE SCREENED. THIS SCREENING MAY BE PROVIDED BY A PRINCIPAL BUILDING. MECHANICAL EQUIPMENT NOT SCREENED BY A PRINCIPAL BUILDING SHALL BE SCREENED BY A USUALLY SOLID FENCE, SCREEN WALL OR PANEL, PARAPET WALL, OR OTHER USUALLY SOLID SCREEN THAT SHALL BE CONSTRUCTED OF MATERIALS COMPATIBLE WITH THOSE USED IN THE EXTERIOR CONSTRUCTION OF THE PRINCIPAL BUILDING.

14.2. EXTERIOR LIGHTING: ALL EXTERIOR LIGHTING SHALL BE DESIGNED AND CONSTRUCTED WITH CUTOFF AND FULLY SHIELDED FIXTURES THAT DIRECT LIGHT DOWNWARD AND INTO THE INTERIOR OF THE PROPERTY AND AWAY FROM ADJACENT ROADS AND PROPERTIES.

15. REQUIRED PARKING PER 5-1100.
- 15.1) DATA CENTER: 1 SPACE/EMPLOYEE ON MAJOR SHIFT.

PROPOSED SITE/ZONING DATA:

1. PROPOSED F.A.R: UP TO 1,414,440 S.F. (0.40)
2. PROPOSED BUILDING HEIGHT: 55'
3. PROPOSED LOT COVERAGE: UP TO 1,591,245 S.F. (0.45)
4. PROPOSED YARDS:
- 4.1) ADJACENT TO ROADS (PRINCIPAL ARTERIAL):
- 4.1.1. 15' BUILDING SETBACK
- 4.1.2. 10' PARKING SETBACK
- 4.2) ADJACENT TO ROADS (MAJOR COLLECTORS):
- 4.2.1. 75' BUILDING SETBACK
- 4.2.2. 35' PARKING SETBACK
- 4.3) ADJACENT TO ROADS:
- 4.3.1. 35' BUILDING SETBACK
- 4.3.2. 25' PARKING SETBACK
- 4.4) ADJACENT TO NONRESIDENTIAL DISTRICTS:
- 4.4.1. 15' BUILDING, OUTDOOR STORAGE & LOADING AREA SETBACKS
- 4.2.2. 15' PARKING SETBACK
5. PROPOSED BUFFERS:
- 5.1) ADJACENT TO ROADS (PRINCIPAL ARTERIAL):
- 5.1.1. 20' TYPE 3 ROAD CORRIDOR BUFFER (95 P.U./100 L.F. OF R.O.W)
- 5.2) ADJACENT TO ROADS (MAJOR COLLECTOR-SYCOLIN RD):
- 5.2.1. 20' ENHANCED TYPE 3 ROAD CORRIDOR BUFFER (95 P.U./100 L.F. OF R.O.W + ADDITIONAL 95 P.U.)*
- 5.3) ADJACENT TO ROADS (SHREVE MILL RD):
- 5.3.1. 10' TYPE 1 ROAD CORRIDOR BUFFER (20 P.U./100 L.F. OF R.O.W)
- *SEE SHEET 03A FOR ENHANCED BUFFER DETAIL.
6. PROPOSED OPEN SPACE:
- GROSS SITE AREA = 83.71 AC
- R.O.W DEDICATION = 2.74 AC
- = NET SITE AREA = 80.17 AC.
- NET SITE AREA WITHIN LEESBURG JLM-A EMPLOYMENT (JLM-A) PLACE TYPE: 6.58 AC.
- NET SITE AREA WITHIN TRANSITION LIGHT INDUSTRIAL (TL) PLACE TYPE: 74.59 AC.
- OPEN SPACE REQUIREMENT PER PLAN POLICY = 40.58 AC (50% OF NET SITE AREA)
- TOTAL OPEN SPACE PROPOSED = 50,000 S.F. OR 11.70 AC. (TREE CONSERVATION AREA)
- 15.80 AC. (ELECTRIC EASEMENT AREA)*
- 15.45 AC. (GENERAL OPEN SPACE)**
- 42.95 AC. (50.91% OF NET PLACE TYPE AREA)*
- *SEE SHEET 03A FOR POLLINATOR MEADOW & INTERMITTENT PLANTING PLAN IN EASEMENT AREA.
- ** GENERAL OPEN SPACE INCLUDES TREE REFORESTATION AREAS, ARCHAEOLOGICAL SITE/BUFFERS, FLOODPLAIN, AND SETBACKS.
7. PROPOSED PARKING:
- THE ANTICIPATED PARKING FOR THE SUBJECT PROJECT SHALL BE SURFACE LOT PARKING LOCATED NEAR BUILDING ENTRANCES TO BE USED PRIMARILY FOR THE EMPLOYEES OF THE BUILDING. THE AMOUNT OF PARKING SPACES WILL BE PROVIDED IN THE REQUIRED NUMBER OF SPACES AS REFERENCED ON NOTE 15 OF THIS SHEET.
8. RISK MANAGEMENT BUFFER:
- THE PROPOSED RISK MANAGEMENT BUFFER IDENTIFIED ON THIS SHEET IS THE ONLY RISK MANAGEMENT BUFFER THAT APPLIES TO THIS SUBJECT PROPERTY.

SIM NARRATIVE

THE EXISTING CONDITIONS OF THE SUBJECT PROPERTY CURRENTLY CONSIST OF MOSTLY WOODED AREA, FEW SMALL BUILDING AND GRAVEL DRIVE WAYS. THE SUBJECT PROPERTY COMPRISES MOSTLY OF C AND D SOILS, AND DRAINS PRIMARILY TO SYCOLIN CREEK. THE PROPOSED SITE WILL BE DEVELOPED WITH P USES.

THE OUTFALL LOCATION OF THE SITE IS INTO SYCOLIN CREEK. THE SPECIFIC STORMWATER MANAGEMENT PRACTICE TO BE IMPLEMENTED ON SITE MAY INCLUDE, BUT SHALL NOT BE LIMITED TO, STEP POOL, CONVEYANCE OR OTHER NATURAL CHANNEL DESIGN TECHNIQUES TO LIMIT ENVIRONMENTAL IMPACTS TO SYCOLIN CREEK AND THE FLOODPLAIN. PROPOSED DEVELOPMENT SHALL MEET THE CONVEYANCE SYSTEM PROTECTION, FLOOD PROTECTION AND WATER QUALITY REQUIREMENTS OF THE FACILITY STANDARD MANUAL FOR END OUTFALL LOCATION.

ALL STORMWATER MANAGEMENT/RMP PROVIDED FOR THIS APPLICATION ARE SUBJECT TO CHANGE AS THE FINAL DESIGN AND COMPUTATIONS SHALL BE PROVIDED AT THE TIME OF THE FINAL SITE PLAN.

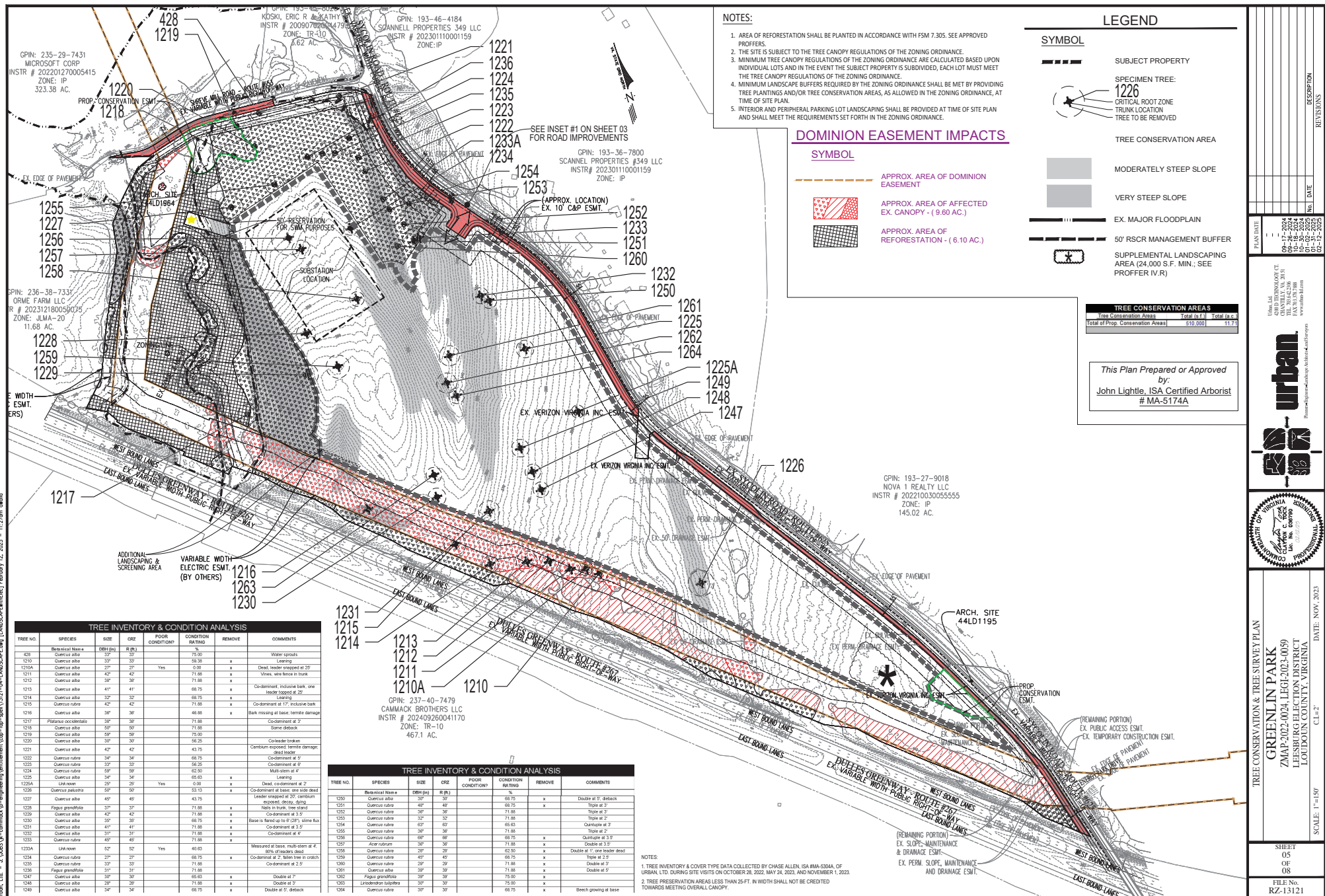
TABLE 01
ZONING TABULATION FOR GPIN: 193-26-9921

AREA OF REZONING (SUBJECT PROPERTY)			
GROSS SITE AREA	3,646,758	83.71	
PROPOSED RIGHT-OF-WAY DEDICATION	117,733	2.70	
PROPOSED RIGHT-OF-WAY VACATION	7,077	0.16	
NET RIGHT-OF-WAY DEDICATION	110,656	2.54	
NET SITE AREA	3,536,102	81.17	
AREA TO BE REZONED FROM JLM-A-20 TO PD-IP	290,478	6.67	
AREA TO BE REZONED FROM TR-10 TO PD-IP	3,245,624	74.50	
TOTAL AREA TO BE REZONED	3,536,102	81.17	
PROPOSED OPEN SPACE*	1,870,902	42.95	

*PROPOSED OPEN SPACE INCLUDES 511,416 SF OR 11.74 AC. OF EXISTING FLOODPLAIN

MEETS & BOUNDS TABLES

LINE	LENGTH	BEARING	MEET AT	BEARING	LENGTH	TO POINT
1	117.57	S 89° 52' 00" W	2	N 89° 52' 00" E	117.57	2
2	117.57	S 89° 52' 00" W	3	N 89° 52' 00" E	117.57	3
3	117.57	S 89° 52' 00" W	4	N 89° 52' 00" E	117.57	4
4	117.57	S 89° 52' 00" W	5	N 89° 52' 00" E	117.57	5
5	117.57	S 89° 52' 00" W	6	N 89° 52' 00" E	117.57	6
6	117.57	S 89° 52' 00" W	7	N 89° 52' 00" E	117.57	7
7	117.57	S 89° 52' 00" W	8	N 89° 52' 00" E	117.57	8
8	117.57	S 89° 52' 00" W	9	N 89° 52' 00" E	117.57	9
9	117.57	S 89° 52' 00" W	10	N 89° 52' 00" E	117.57	10
10	117.57	S 89° 52' 00" W	11	N 89° 52' 00" E	117.57	11
11	117.57	S 89° 52' 00" W	12	N 89° 52' 00" E	117.57	12
12	117.57	S 89° 52' 00" W	13	N 89° 52' 00" E	117.57	13
13	117.57	S 89° 52' 00" W	14	N 89° 52' 00" E	117.57	14
14	117.57	S 89° 52' 00" W	15	N 89° 52' 00" E	117.57	15
15	117.57	S 89° 52' 00" W	16	N 89° 52' 00" E	117.57	16
16	117.57	S 89° 52' 00" W	17	N 89° 52' 00" E	117.57	17
17	117.57	S 89° 52' 00" W	18	N 89° 52' 00" E	117.57	18
18	117.57	S 89° 52' 00" W	19	N 89° 52' 00" E	117.57	19
19	117.57	S 89° 52' 00" W	20	N 89° 52' 00" E	117.57	20
20	117.57	S 89° 52' 00" W	21	N 89° 52' 00" E	117.57	21
21	117.57	S 89° 52' 00" W	22	N 89° 52' 00" E	117.57	22
22	117.57	S 89° 52' 00" W	23	N 89° 52' 00" E	117.57	23
23	117.57	S 89° 52' 00" W	24	N 89° 52' 00" E	117.57	24
24	117.57	S 89° 52' 00" W	25	N 89° 52' 00" E	117.57	25
25	117.57	S 89° 52' 00" W	26	N 89° 52' 00" E	117.57	26
26	117.57	S 89° 52' 00" W	27	N 89° 52' 00" E	117.57	27
27	117.57	S 89° 52' 00" W	28	N 89° 52' 00" E	117.57	28
28	117.57	S 89° 52' 00" W	29	N 89° 52' 00" E	117.57	29
29	117.57	S 89° 52' 00" W	30	N 89° 52' 00" E	117.57	30
30	117.57	S 89° 52' 00" W	31	N 89° 52' 00" E	117.57	31
31	117.57	S 89° 52' 00" W	32	N 89° 52' 00" E	117.57	32
32	117.57	S 89° 52' 00" W	33	N 89° 52' 00" E	117.57	33
33	117.57	S 89° 52' 00" W	34	N 89° 52' 00" E	117.57	34
34	117.57	S 89° 52' 00" W	35	N 89° 52' 00" E	117.57	35
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40	117.57	S 89° 52' 00" W	41	N 89° 52' 00" E	117.57	41
41	117.57	S 89° 52' 00" W	42	N 89° 52' 00" E	117.57	42
42	117.57	S 89° 52' 00" W	43	N 89° 52' 00" E	117.57	43
43	117.57	S 89° 52' 00" W	44	N 89° 52' 00" E	117.57	44
44	117.57	S 89° 52' 00" W	45	N 89° 52' 00" E	117.57	45
45	117.57	S 89° 52' 00" W	46	N 89° 52' 00" E	117.57	46
46	117.57	S 89° 52' 00" W	47	N 89° 52' 00" E	117.57	47
47	117.57	S 89° 52' 00" W	48	N 89° 52' 00" E	117.57	48
48	117.57	S 89° 52' 00" W	49	N 89° 52' 00" E	117.57	49
49	117.57	S 89° 52' 00" W	50	N 89° 52' 00" E	117.57	50
50	117.57	S 89° 52' 00" W	51	N 89° 52' 00" E	117.57	51
51	117.57	S 89° 52' 00" W	52	N 89° 52' 00" E	117.57	52
52	117.57	S 89° 52' 00" W	53	N 89° 52' 00" E	117.57	53
53	117.57	S 89° 52' 00" W	54	N 89° 52' 00" E	117.57	54
54	117.57	S 89° 52' 00" W	55	N 89° 52' 00" E	117.57	55
55	117.57	S 89° 52' 00" W	56	N 89° 52' 00" E	117.57	56
56	117.57	S 89° 52' 00" W	57	N 89° 52' 00" E	117.57	57
57	117.57	S 89° 52' 00" W	58	N 89° 52' 00" E	117.57	58
58	117.57	S 89° 52' 00" W	59	N 89° 52' 00" E	117.57	59
59	117.57	S 89° 52' 00" W	60	N 89° 52' 00" E	117.57	60
60	117.57	S 89° 52' 00" W	61	N 89° 52' 00" E	117.57	61
61	117.57	S 89° 52' 00" W	62	N 89° 52' 00" E	117.57	62
62	117.57	S 89° 52' 00" W	63	N 89° 52' 00" E	117.57	63
63	117.57	S 89° 52' 00" W	64	N 89° 52' 00" E	117.57	64
64	117.57	S 89° 52' 00" W	65	N 89° 52' 00" E	117.57	65
65	117.57	S 89° 52' 00" W	66	N 89° 52' 00" E	117.57	66
66	117.57	S 89° 52' 00" W	67	N 89° 52' 00" E	117.57	67
67	117.57	S 89° 52' 00" W	68	N 89° 52' 00" E	117.57	68
68	117.57	S 89° 52' 00" W	69	N 89° 52' 00" E	117.57	69
69	117.57	S 89° 52' 00" W	70	N 89° 52' 00" E	117.57	70
70	117.57	S 89° 52' 00" W	71	N 89° 52' 00" E	117.57	71
71	117.57	S 89° 52' 00" W	72	N 89° 52' 00" E	117.57	72
72	117.57	S 89° 52' 00" W	73	N 89° 52' 00" E	117.57	73
73	117.57	S 89° 52' 00" W	74	N 89° 52' 00" E	117.57	74
74	117.57	S 89° 52' 00" W	75	N 89° 52' 00" E	117.57	75
75	117.57	S 89° 52' 00" W	76	N 89° 52' 00" E	117.57	76
76	117.57	S 89° 52' 00" W	77	N 89° 52' 00" E	117.57	77
77	117.57	S 89° 52' 00" W	78	N 89° 52' 00" E	117.57	78
78	117.57	S 89° 52' 00" W	79	N 89° 52' 00" E	117.57	79
79	117.57	S 89° 52' 00" W	80	N 89° 52' 00" E	117.57	80
80	117.57	S 89° 52' 00" W	81	N 89° 52' 00" E	117.57	81
81	117.57	S 89° 52' 00" W	82	N 89° 52' 00" E	117.57	82
82	117.57	S 89° 52' 00" W	83	N 89° 52' 00" E	117.57	83
83	117.57	S 89° 52' 00" W	84	N 89° 52' 00" E	117.57	84
84	117.57	S 89° 52' 00" W	85	N 89° 52' 00" E	117.57	85
85	117.57	S 89° 52' 00" W	86	N 89° 52' 00" E	117.57	86
86	117.57	S 89° 52' 00" W	87	N 89° 52' 00" E	117.57	87
87	117.57	S 89° 52' 00" W	88	N 89° 52' 00" E	117.57	88
88	117.57	S 89° 52' 00" W	89	N 89° 52' 00" E	117.57	89
89	117.57	S 89° 52' 00" W	90	N 89° 52' 00" E	117.57	90
90	117.57	S 89° 52' 00" W	91	N 89° 52' 00" E	117.57	91
91	117.57	S 89° 52' 00" W	92	N 89° 52' 00" E	117.57	92
92	117.57	S 89° 52' 00" W	93	N 89° 52' 00" E	117.57	93
93	117.57	S 89° 52' 00" W	94	N 89° 52' 00" E	117.57	94
94	117.57	S 89° 52' 00" W	95	N 89° 52' 00" E	117.57	95
95	117.57	S 89° 52' 00" W	96	N 89° 52' 00" E	117.57	96
96	117.57	S 89° 52' 00" W	97	N 89° 52' 00" E	117.57	97
97	117.5					





NOTE: THE BUILDING DESIGN SHOWN IN THIS RENDERING REFLECTS THE BUILDING DESIGN REQUIREMENTS OF PROFFER IIA OF THE PROFFER STATEMENT. VARIATIONS TO THE BUILDING DESIGN SHOWN IN THIS RENDERING ARE PERMITTED SO LONG AS THEY ARE IN COMPLIANCE WITH PROFFER IIA OF THE PROFFER STATEMENT.

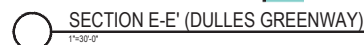
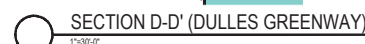
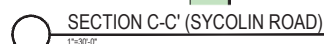
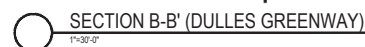
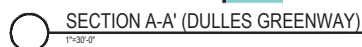
BUILDING RENDERING
GREENLIN PARK
ZMAP-2022-0024, LEG1-2023-0059
LEESBURG ELECTION DISTRICT
LOUDOUN COUNTY, VIRGINIA

SCALE: N/A
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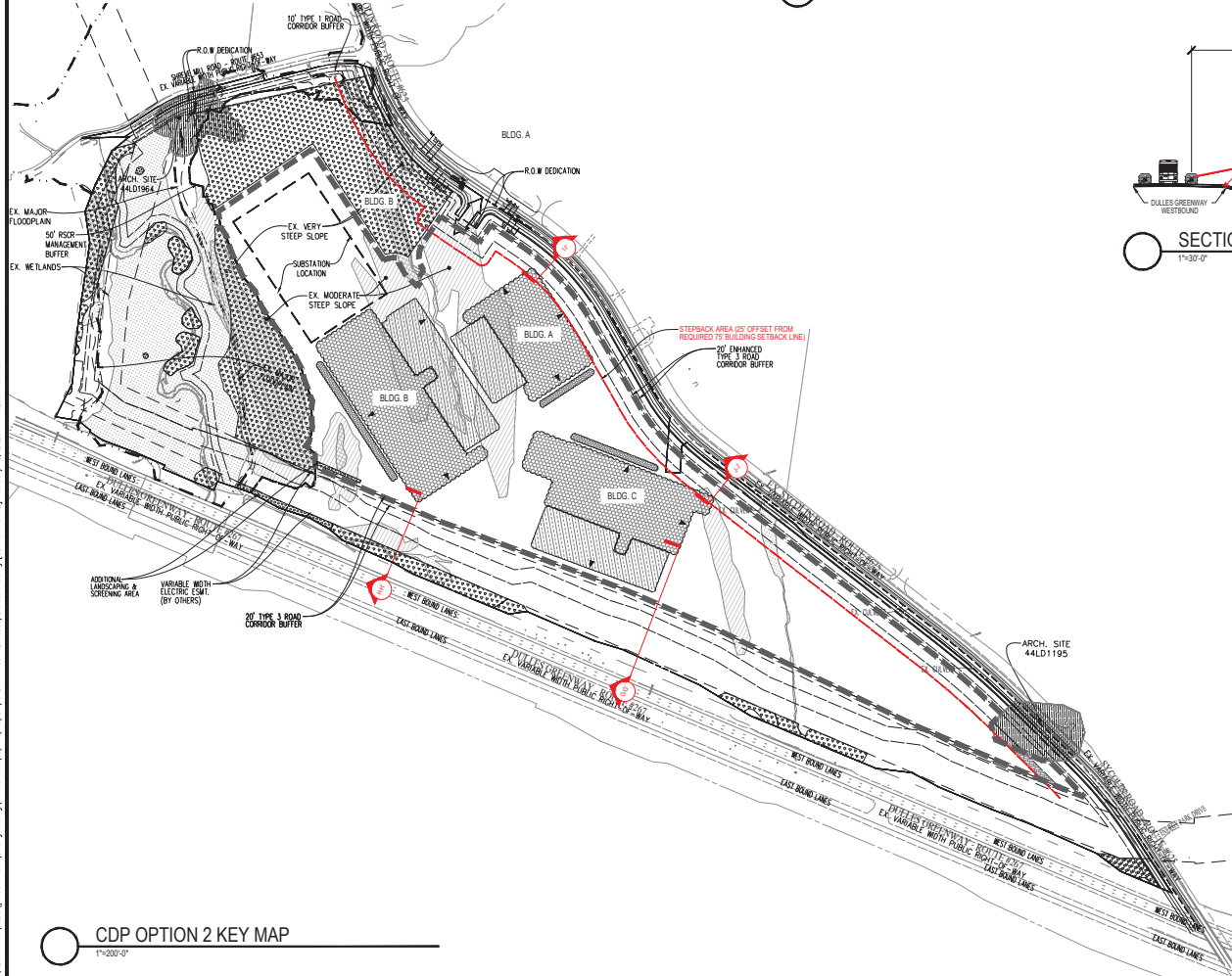
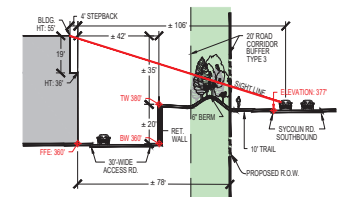
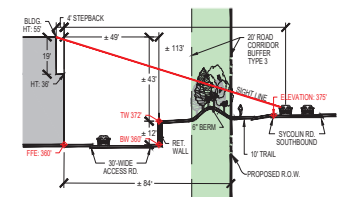
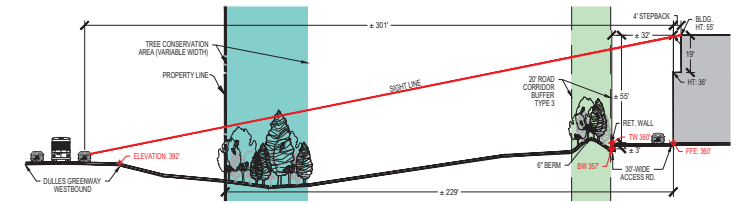
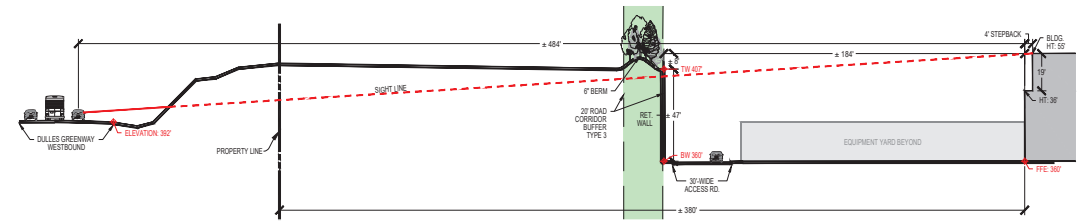
Urban, Ltd.
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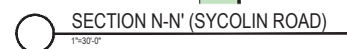
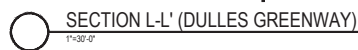
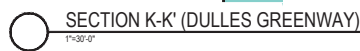
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GREENLIN PARK ZMAP-2022-0024, LEG1-2023-0059 LEBESBURG ELECTION DISTRICT LOUDOUN COUNTY, VIRGINIA	SCALE: AS NOTED C1= N/A	DATE: JAN. 2023			Urban, Ltd. 4200 TECHNOLOGY CT. DUBLIN, VA 22029 TEL: 703.688.2031 FAX: 703.688.2024 FAX: 703.688.2024 www.urban.ltd.com	PLAN DATE																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																						</
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Urban, Ltd. - J:\J08S\k-kommock\p-engineering\entitlement\cdp-fdp-sprx\13121-11-CDP Landscape Sections.dwg [CDP OPTION 1] February 12, 2025 - 11:28am aawila





CROSS SECTIONS - OPTION 3		DATE: JAN. 2023	
GREENLIN PARK		CL#N/A	
ZMAP-2022-0024, LEG-2023-0059		SCALE: AS NOTED	
LEISBURG ELECTION DISTRICT		SHEET	
LOUDDOWN COUNTY, VIRGINIA		08B	
		08	
FILE No.		RZ-13121	



WALSH COLUCCI
LUBELEY & WALSH PC

Erin L. Swisshelm
(571) 209-5774
eswisshelm@thelandlawyers.com

January 2, 2025

Via E-Mail

R. Marchant Schneider
Planning Manager, Land Use Review
Department of Planning and Zoning
1 Harrison Street, SE, 3rd Floor
Leesburg, Virginia 20175

Re: Greenlin Park Summary of Changes Letter
(LEGI-2023-0059; ZMAP-2022-0024)

Dear Mr. Schneider:

On behalf of JK Land Holdings, the applicant for the Greenlin Park rezoning application ("Applicant"), I am providing you with this cover letter summarizing the revisions to application materials included with this resubmission. The Applicant team thanks you and Ms. King for meeting on December 12, 2024 to discuss Staff's comments and the Applicant's proposed changes to the application, and for your willingness to visit the project site with the team following that meeting. As discussed during the meeting, the Applicant has continued to evaluate the proposal to identify ways to address Staff concerns regarding building height and buffering, and is grateful to have Staff's impressions prior to resubmission.

Application Revisions

Addressing the intention of the Transition Light Industrial place type and the site's proximity to both the Greenway and Sycolin Road, the Applicant has incorporated steps to create a visually distinct project through use of landscaping, berming, enhanced setbacks, retaining walls, which allow the Applicant to vertically lower the buildings into the site. These steps result in significantly increased visual screening of the proposed development, as the massing of the buildings and overall building height as viewed from adjacent roadways is significantly decreased. In areas where buildings or the screening walls of equipment yards will be visible from adjacent roadways, the applicant has proffered specific language committing to attractive building design, building materials and fenestration.

Property Cross Sections. The Application has prepared three cross section sheets, incorporated into the Concept Development Plan (“CDP”) as sheets 08, 08A, and 08B, respectively. These cross sections are intended to depict the scale and effect of proposed setbacks, building step-backs, and buffering techniques on the perception of building height from surrounding rights-of-way. As shown on the newly included sheets, multiple view points have been provided for each development option showing how the proposed buildings will appear from different vantage points. The cross sections also depict the Applicant’s commitment to utilizing retaining walls, in addition to berming and landscaping, to reduce the visual impact of the proposed buildings when viewed from public rights-of-way. The proposed retaining walls allow the base of the proposed buildings to be constructed below the existing grade of Sycolin Road, and thus improve the efficacy of the proposed landscaped berm in screening the buildings from view along that roadway. Specifically, the proposed retaining walls reduce the building height above the grade of Sycolin Road to bring the overall perceived height in line with Staff’s recommendations. The included sight line details further show that the proposed berming and landscaping will effectively shield the remaining portions of the building from view along Sycolin Road. The cross sections further depict the sight lines from the Dulles Greenway, and how the existing topography surrounding the Property effectively mitigates the visual impact of the proposed buildings. These additional screening measures, combined with previously included commitments, contribute to the Property’s design being visually distinct from the development patterns within the Suburban Policy Area, as recommended by the 2019 Loudoun County General Plan.

Reduction of Building and Parking Area. The Applicant has also removed the parking and loading area in the southeastern area of the Property that was included in previous submission documents in order to improve the visual impact of the Property as viewed from northbound Sycolin Road, and further reduce visual impacts of the proposed development.

Decreased FAR. The application includes a commitment to a maximum FAR of .40, which is a significant reduction from the prior commitment of a maximum FAR of .60. The Applicant was also pleased to collaborate with adjacent owners to ensure that the property immediately to the west reduced the potential data center square footage by over 500,000 square feet. When combined with the 30 % reduction in on-site FAR, the application will have reduced the potential data center footprint in this area by over 1.2 million square feet.

Supplemental Landscaping. The Applicant has added a commitment to supplemental landscaping in the southeastern portion of the Property, which may consist of any combination of retained trees and/or meadow style plantings to improve the viewshed of the Property as viewed from the northbound approach on Sycolin Road, and to provide additional habitat supportive areas on the Property. The Applicant has also provided a commitment to retain and plant additional landscape screening along the Property’s boundary with the Dulles Greenway in the areas where the proposed building facades would otherwise be most visible. The effect of this additional screening may be seen on Sheets 03, 03A, 03B, 08, 08A, and 08B of the updated CDP included with this letter. As discussed above, the visual impact of the proposed buildings has been greatly reduced throughout the rest of the Property through existing topography and the use of landscaping and

retaining walls which allow the buildings to be constructed at a lower grade than adjacent Sycolin Road.

The reduction in proposed FAR coupled with the additional screening commitments results in a less intensive development that is effectively and creatively screened from adjacent roadways and neighboring properties, in keeping with the Plan's recommendations for the Transition Light Industrial place type.

We thank you again for meeting to discuss these changes, and look forward to continuing to work with Staff as the application advances for Board action. Please let me know if you have any questions.

Sincerely,

WALSH, COLUCCI, LUBELEY &
WALSH, P.C.



Erin L. Swisshelm

Enclosures, as follows:

Updated Proffer Statement (Redline and Clean Versions)
Updated Concept Development Plan

cc: Chuck Kuhn, JK Land Holdings
Steve Kuhn, JK Land Holdings
Charles Yudd, JK Land Holdings
John Cox, JK Land Holdings
Clayton Tock, Urban, Ltd.
J. Randall Minchew, Esq., Walsh, Colucci, Lubeley & Walsh, P.C.
Michael G. Romeo, AICP, Walsh, Colucci, Lubeley & Walsh, P.C.



**WALSH COLUCCI
LUBELEY & WALSH PC**

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mromeo@thelandlawyers.com

October 30, 2024

Via E-Mail

R. Marchant Schneider
Planning Manager, Land Use Review
Department of Planning and Zoning
1 Harrison Street, SE, 3rd Floor
Leesburg, Virginia 20175

Re: Greenlin Park Response Letter
(LEGI-2023-0059; ZMAP-2022-0024)

Dear Mr. Schneider:

On behalf of JK Land Holdings, the applicant for the Greenlin Park rezoning application (“Applicant”), I am providing you with this letter that includes responses to the County staff referral comments from Zoning Administration, DTCL, and Community Planning that were provided in your email dated October 25, 2024. The Applicant’s responses to the referral comments provided by the County Attorney and Proffer Management are enclosed. The responses included in this letter and in the enclosures reflect the discussion between the Applicant and County staff on October 29, 2024. For your convenience, each of the outstanding issues are stated below and the Applicant’s responses follow in bold italics.

ZONING ADMINISTRATION (Jacob Hambrick, CZA)

After reviewing the revised material, Zoning Administration has the following comments:

1. “Energy Storage Facility” is not a term or use defined within the R93 ZO. Remove the term from the CDP sheets. Additionally, the following note on Sheets 03, 03A, and 03B must be removed from the sheets. Note that the introduction of additional uses to a pending application after the effective date, is considered a “substantial modification” and runs the risk of losing the application’s “grandfathered” status. See #6 of the Grandfathering Rules adopted as part of ZOAM-2020-0001.

ATTORNEYS AT LAW

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*NOTE: APPROVAL OF A FUTURE MINOR SPECIAL EXCEPTION WOULD BE NECESSARY TO ESTABLISH THE ENERGY STORAGE FACILITY IF IT'S NOT CONSIDERED A UTILITY SUBSTATION ALIGNED WITH THE ON-SITE DATA CENTERS.

Applicant Response:

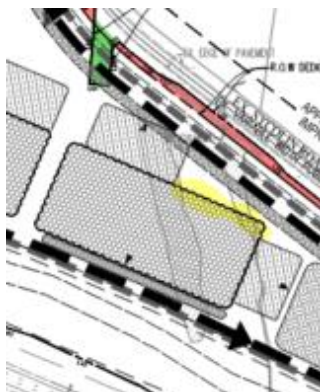
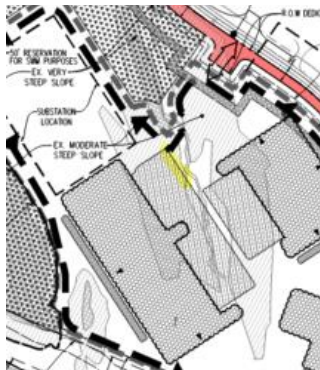
The Energy Storage Facility term and the above referenced note are now removed from the CDP. Following up on the Applicant's discussion with County staff, the CDP now makes reference to this area as, "BUILDING, PARKING, AND LOADING AREA".

2. There are two "Option 3"s as indicated within the Sheet Title. Sheets 03A and 03B.

Applicant Response:

To address this inconsistency, the title block for Sheet 03A now states "Option 2".

3. Principal Building Facades should be indicated for the area identified as "Possible Area for Future Building, Parking, Loading, or Energy Storage Facility". Additionally, some additional areas of the proposed buildings and/or equipment yards must be shown as "Principal Building Facades". See below.



Applicant Response:

The CDP is now updated with Principle Building Façade labels for the highlighted areas identified in the images above, the Building, Parking, and Loading Area, and additional areas identified by the Applicant.

4. Parking and Building Setback along Dulles Greenway. It appears that the labeled “100’ Parking Setback” and the “150’ Building Setback” are still reversed on the CDP.

Applicant Response:

Sheets 03, 03A, and 03B of the CDP are now updated to correct this discrepancy.

5. Remove the “75’-100’ Building Limitation Zone” from the portion of the Archeological Site (44LD1195) as shown on Sheets 03,03A, and 03B.

Applicant Response:

The CDP is now updated accordingly.

6. Ensure that the area (acreage) to be rezoned is consistent within the CDP and Proffer Statement.

Applicant Response:

The acreage to be rezoned is now consistent on the CDP and proffer statement.

DTCI (Bradley Polk)

DTCI has reviewed the latest (7th?) submission materials and offers the following comments:

Comment 7 (Emergency Access): Comment addressed.

Applicant Response:

Comment noted.

Comment 13 (Sycolin Road Shared Use Path): Comment addressed.

Applicant Response:

Comment noted.

Comment 16 (Traffic Signal at Sycolin Road Site Entrance): Comment not addressed. As stated in the fifth referral, Proffer III.A continues to not comply with the County’s approved traffic signal proffer template. The Applicant should revise the proffer to provide the \$500,000 cash contribution only if the signal or innovative intersection control improvement is not warranted or provided by others, as provided for in the template language. The cash contribution should not be

provided as a means to forgo installation of a traffic signal or innovative intersection control improvement.

Applicant Response:

As previously stated, the Applicant is agreeable to installing a traffic signal at two separate points in time if it is warranted by VDOT. This approach provides a reasonable means by which to install a traffic signal at the Sycolin Road entrance. The additional scenarios contemplated in the proffer are also reasonable means by which to address an alternative request by VDOT.

Comment 29 (Shreve Mill Road Treatment Proffer): Comment not addressed. As stated in the fifth referral, it is unlikely the Crosstrail Boulevard project is completed to a point that Shreve Mill Road will be closed east of the Dulles Greenway prior to the Applicant securing site plan approval for the Property, as such, it is unlikely this proffer will be triggered.

Applicant Response:

The Applicant discussed this proffer with County staff on October 16, 2024. The timing of this proffer was acknowledged during this discussion, but no revisions are proposed.

COMMUNITY PLANNING (Rebekah King)

- My comment on building height is still outstanding.

Community Planning continues to recommend a commitment to a maximum building height of three stories as envisioned in the Transition Light Industrial Place Type. Without building elevations to understand the visual impacts of the building height, Community Planning is not persuaded that 60 feet in building height conforms to the vision for the Place Type. This issue is not resolved.

Applicant Response:

The Applicant has agreed to multiple measures to help mitigate any impacts associated with the proposed building height, including the Sycolin Road enhanced buffer, Sycolin Road Building Limitation Zone, enhanced building design commitments including a step-back or recessed plane, and additional building façade standards for equipment yards facing Sycolin Road and the Greenway. In addition to these mitigation measures, the subject property is located a significant distance from any planned residential dwelling units. As was discussed with Community Planning staff during the October 29, 2024 discussion, the Applicant is now committing to limit the maximum building height on the subject property to 55 feet. This building height restriction, in addition to the commitments referenced above, represent the Applicant's willingness to mitigate potential visual impacts on the subject property.

Community Planning staff has previously supported building heights on nearby properties that exceed 36 feet in the Transition Light Industrial Place Type based on the

implementation of mitigation measures or a different interpretation of the height of a story (see the True North Data and Sycolin Road Distribution Facility applications). The Applicant is proposing mitigation measures that are unique to the subject property and that align with the number of stories permitted in the place type, complement the building height analysis supported by the Planning Commission, and reflect the reality of the building heights permitted at 60 feet and higher on adjacent and nearby properties within the Transition Light Industrial Place Type.

- Additionally, the equipment yard screening is insufficient. Some commitment to fenestration should be included or a commitment to variation in wall height/step backs. As it reads right now, the equipment yard screening is basically only describing materials.

Applicant Response:

The variation of materials, patterns, and colors that are committed to in the proffer statement will produce a visually interesting equipment yard façade. With this being said, the updated proffer statement now includes an additional commitment to a variation of a minimum of two feet in the parapet and/or wall height of the equipment yard screen that will extend horizontally across 25% of the Principal Building Façade.

- The main building entrance should be on a building side with principal façade.

Applicant Response:

The proffer statement is now updated to state that a main building entrance will be located on a Principal Building Façade.

- The building elevations are only illustrative with a general conformance commitment; some of the included examples look more industrial than others which is less desirable.

Applicant Response:

The evaluation of a building design can be subjective. What the Applicant can confirm is that the building design standards required by the enclosed proffer statement reflect the data center façade standards included in the recently adopted zoning ordinance. The renderings included on Sheet 07 of the CDP are representative of the building design proffer included in the enclosed proffer statement.

- The designs on sheet 3 and 3B has equipment yards facing Sycolin; sheet 3B would have a large amount of equipment yard/loading facing Sycolin given its size.

Applicant Response:

The Applicant added commitments to the CDP and proffer statement that these areas would be considered a Principal Building Façade and thus subject to a higher level of design.

We hope that the responses included in this letter sufficiently address the outstanding issues. Please let me know if you have any questions.

Sincerely,

WALSH, COLUCCI, LUBELEY &
WALSH, P.C.

A handwritten signature in black ink, appearing to read "Michael G. Romeo", with a long horizontal flourish extending to the right.

Michael G. Romeo, AICP
Senior Land Use Planner

Enclosures, as follows:

Updated Proffer Statement (Redline and Clean Versions)
Updated Concept Development Plan
Applicant Responses to County Attorney Comments
Applicant Responses to Proffer Management Comments

cc: Chuck Kuhn, JK Land Holdings
Steve Kuhn, JK Land Holdings
Charles Yudd, JK Land Holdings
John Cox, JK Land Holdings
Clayton Tock, Urban, Ltd.
J. Randall Minchew, Esq., Walsh, Colucci, Lubeley & Walsh, P.C.



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October 18, 2024

Via E-Mail

R. Marchant Schneider
Planning Manager, Land Use Review
Department of Planning and Zoning
1 Harrison Street, SE, 3rd Floor
Leesburg, Virginia 20175

Re: Greenlin Park Outstanding Issues Response Letter
(LEGI-2023-0059: ZMAP-2022-0024)

Dear Mr. Schneider:

On behalf of JK Land Holdings, the applicant for the Greenlin Park rezoning application ("Applicant"), I am providing you with this letter that includes responses to the Outstanding Issues Summary of September 27, 2024. The responses included in this letter reflect the discussion between the Applicant and County staff on October 16, 2024. For your convenience, each of the outstanding issues are stated below and the Applicant's responses follow in bold italics.

Land Use:

1. **Parcel Identification Number & Acreage** – The subject property was subdivided with PLAT-2023-0084. The parcel identification numbers have been revised and acreage changed. The subject property is now PIN 193269921000.

Staff Recommendation: Staff recommend the Proffers CDP, and all other application materials be revised accordingly to reflect the updated PIN and acreage.

Applicant Response:

The proffer statement and CDP are now updated to reflect the subject property's new PIN 193-26-9921-000. It should be noted that the subdivision was recorded on September 26, 2024. This recordation occurred after public hearings with the Planning Commission and the Board of Supervisors.

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The Applicant's engineer recreated the rezoning area boundary per the metes & bounds table provided on the recorded plat in order to verify the newly subdivided boundary. This review confirmed that the subject property's net site area is 81.17 acres after right-of-way dedication/vacation, which matches the rezoning area boundary. On Sheet 03C of the plan set, the gross land is listed as 83.71 acres, which matches the acreage shown on the recorded plat.

2. Uses – The applicant revised the Proffers to remove reference to allowing “Data Center Mechanical Equipment” use, which was not a use listed in either Zoning Ordinance and added the “Energy Storage Facility” use. The Proffer Statement has also been revised to state that Data Center uses **shall be permitted** rather than limiting the uses on the site to data center and the utility substation use. This change appears to allow any IP use within the CDP area. According to Paragraph 6 of the Grandfathering Resolution, the addition of uses would be considered a “substantial modification” which would result in the plan losing its “Grandfathering” status. In addition, the Energy Storage Facility use is not a use listed in the Revised 1993 Zoning Ordinance but is listed as a use in the Zoning Ordinance requiring Minor Special Exception in this Zoning District.

Staff Recommendation: If this application does not intend to remove grandfathering status or revise the application to be reviewed under the current Zoning Ordinance and add a Minor Special Exception application, the reference should be removed, and this use should be contemplated as separate legislative action.

Applicant Response:

The reference to the energy storage facility is now removed from the proffer statement. The concept layouts now include an updated note based on the Applicant's recent discussion with County staff, which states, “POSSIBLE AREA FOR FUTURE BUILDING, PARKING, LOADING, OR ENERGY STORAGE FACILITY (APPROVAL OF A FUTURE MINOR SPECIAL EXCEPTION WOULD BE NECESSARY TO ESTABLISH THE ENERGY STORAGE FACILITY IF IT'S NOT CONSIDERED A UTILITY SUBSTATION ALIGNED WITH THE ON-SITE DATA CENTERS)”.

3. Development Scope – The applicant revised the Proffers to include “if in the future the Property is consolidated with the adjacent property, identified as PIN (“Orme Property”), no Data Center use shall be permitted on the Orme Property.”

Staff Recommendation: Staff recommend this Proffer language be removed as a Proffer cannot compel or restrict property that is not part of this application.

Applicant Response:

This language is now removed from the proffer statement.

Compatibility:

4. Building Height - The 2019 GP envisions those buildings in the TLI Place Type be limited to three stories in height, which staff has consistently interpreted to be equivalent to approximately 36 feet. The proposed IP Zoning District allows buildings up to 60 feet in height, which is 24 feet taller than what is anticipated in the TLI Place Type.

Staff Recommendation: Staff continues to recommend the applicant provide buildings at a building height more compatible with the 2019 GP or provide varying building height with lower building heights adjacent to roadways to reduce visual impact and consistent with the surrounding area and design policies of the TLI Place Type.

Applicant Response:

The Applicant appreciates County staff's position on this issue. The Applicant hopes that the additional commitments included in the updated proffer statement and CDP, including the Building Limitation Zone, enhanced Sycolin Road buffer, commitment to building layouts, and improved building and equipment yard design standards, will provide enough mitigation to enable support for the proposed building height.

It should be noted, as previously stated, that the Transition Light Industrial place type permits building height between one and three stories. There is no reference to how many feet equal a story in this place type. The only two place types in the 2019 General Plan that reference 12 feet as a story are the Urban Transit Center and Urban Employment place types. The proposed buildings will be permitted up to 60 feet in height, which aligns with permitted building heights on surrounding properties. Additionally, the PD-IP/IP district permits up to 60 feet for building height and it is the primary zoning district used to implement the Transition Light Industrial place type.

5. Building and Site Design – The applicant revised the CDP to include three optional design layouts for data center and energy storage facility uses. Notwithstanding the outstanding issue pertaining to uses described above, staff find the following issues related to building and site design:
 1. Substantial Conformance – The applicant provided three optional site design illustratives, demonstrating different numbers of buildings, building layouts, building orientations, different locations, orientations, and scales of energy storage facility uses mechanical equipment, parking, loading areas, and internal vehicle and pedestrian networks among other differences, but committed to construct in “general conformance” with all three options. This terminology does not align with the Zoning Ordinance terminology for “substantial conformance.”

Staff Recommendation: Staff recommend the applicant commit to develop in substantial conformance pursuant to the Zoning Ordinance with one of the design sheets and remove references in the CDP to being “illustrative.”

Applicant Response:

The Applicant is now agreeable to substantial conformance with the building layout options included on Sheets 03, 03A, and 03B of the updated plan set. The “illustrative” and “general conformance” references to these sheets are now removed from the CDP and proffer statement. The Applicant is now providing three specific layouts to which it will substantially conform. This approach of providing multiple layout options as part of a CDP has been used often in previously approved applications in which a specific layout is not entirely known at the concept planning stage. This approach provides specific information and commitments that comply with County policy while remaining nimble enough to accommodate the requirements of future users.

2. Architectural Elevations and/or Drawings – The applicant revised the Proffers to provide architectural elevations/drawings prior to approval of zoning permit, instead of during site plan review. Additionally, the sample elevations provided does not all appear to be representative of the proposed building height and do not show each side of the building to include the equipment yards.

Staff Recommendation: Staff recommends the applicant provide a commitment to design elevations and architectural drawings as part of the legislative process for review for conformance with the 2019 GP or commit to provide elevations/drawings demonstrating conformance with the Proffers at the time of site plan, consistent with County practices. Additionally, staff recommend the applicant provide sample elevations depicting proposed building height and all sides of the buildings to include the screening of mechanical yards.

Applicant Response:

As stated in the updated proffers, the Applicant is committed to provide elevations/drawings demonstrating conformance with the proffers at the time of site plan. The building design proffer is now updated to include standards that address the screening of mechanical yards as a principal building façade.

3. Secondary Access – Described in more detail below, Staff has identified two points of access should be provided based on square footage proposed.

Applicant Response:

Based on guidance provided by Zoning Administration staff following the Applicant’s discussion with County staff, an area south of the main entrance is now highlighted as a potential right-in/right-out emergency access. A note is now included on Sheets 03, 03A, 03B, which states, “POTENTIAL LOCATION FOR “RIGHT-IN/RIGHT-OUT” ENTRANCE ALONG SYCOLIN RD. SHALL BE PROVIDED AT TIME OF SITE PLAN FOR EMERGENCY ACCESS”. Additionally, a note addressing the final location of this second entrance is now included on Sheet 03C, which states, “FINAL LOCATION OF THE SECONDARY “RIGHT-IN/RIGHT-OUT ENTRANCE ALONG SYCOLIN ROAD SHOWN

ON SHEETS 03-03B SHALL BE PROVIDED AT TIME OF SITE PLAN FOR EMERGENCY ACCESS.”

4. Sycolin Road Building Limitation Zone – The applicant added a Proffer to provide a “Sycolin Road Building Limitation Zone” limiting development within 75-100 feet of Sycolin Road to 10%.

Staff Recommendation: Staff recommend the applicant clarify the language proposed to ensure intended implementation and interpretation. (i.e. does this proposed commitment mean within the total area of the limitation zone, only 10% of that area will be occupied by structures?

Applicant Response:

This language is now updated in the proffer statement to confirm that no more than 10% of this area can be occupied by buildings and equipment yards.

6. Principal Facades – As part of the three optional design layouts provided in the revised CDP, the applicant demonstrates those parts of the buildings are to be “Principal Building Facades” as noted in Section 5-664(A), however, all portions of the proposed buildings that face adjacent public roads must be identified as principal building facades, also stated in Proffer II.A.

Staff Recommendation: Staff recommend the applicant revise the CDP consistent with the Zoning Ordinance requirement and Proffer Statement demonstrating all principal facades on each of the buildings in the three proposed design layout options.

Applicant Response:

The updated proffer statement now includes building design standards that apply to a principal building façade for an equipment yard.

7. Screening – The applicant provided a Proffer for mechanical and generator screening that is substantially similar to the requirements of Section 5-664(B) of the Revised 1993 Zoning Ordinance.

Staff Recommendation: Staff recommend this language be removed to avoid a conflict in future implementation.

Applicant Response:

It is the Applicant’s preference to keep this more specific language in the proffer statement in order to clarify the screening requirement that is applicable to the subject property.

8. Noise – The applicant has provided a Proffer to provide a noise study for “impulsive” sound.

Staff Recommendation: Staff recommend the Proffer language be amended to be consistent with the Zoning Ordinance to revise “impulsive sound” to either “Maximum A-Weighted Sound Level” or “sound.”

Applicant Response:

The proffer statement is now revised to reference “sound”.

Natural Resources:

9. Habitat - The 2019 GP recommends protection of natural and heritage resources, including rare, threatened, and endangered plant and animal species, and protection of wildlife habitats. The subject property contains habitat suitable for the wood turtle, which is an endangered species.

Staff Recommendation: Staff acknowledgement of the proffer language as written is a site / application specific position.

Applicant Response:

Comment noted.

10. Discharges into Sycolin Creek – The applicant revised the Proffers to require stormwater to pass through new alternative systems, rather than previously committed systems, before discharging directly into Sycolin Creek.

Staff Recommendation: Staff suggest this be revised to require stormwater to discharge into previously committed and primary systems, rather than proposed alternatives.

Applicant Response:

Based upon further review by the Applicant’s engineer, the Applicant has retained the discharge language that was previously discussed with County staff yet was inadvertently deleted in the previous submission of the proffer statement. The Applicant previously met with County staff to discuss this issue in detail and arrived at the language that is now included in the proffer statement.

Transportation:

11. Access – Two points of access are required to serve the subject property pursuant to Loudoun County Fire Code.

Staff Recommendation: Staff recommend the applicant revise the CDP to demonstrate two points of access to serve the site pursuant to fire code regulation. Adding a note to the CDP was previously discussed.

Applicant Response:

As previously stated, based on guidance provided by Zoning Administration staff following the Applicant's discussion with County staff, an area south of the main entrance is now highlighted as a potential right-in/right-out emergency access. A note is now included on Sheets 03, 03A, 03B, which states, "POTENTIAL LOCATION FOR "RIGHT-IN/RIGHT-OUT" ENTRANCE ALONG SYCOLIN RD. SHALL BE PROVIDED AT TIME OF SITE PLAN FOR EMERGENCY ACCESS". Additionally, a note addressing the final location of this second entrance is now included on Sheet 03C, which states, "FINAL LOCATION OF THE SECONDARY "RIGHT-IN/RIGHT-OUT ENTRANCE ALONG SYCOLIN ROAD SHOWN ON SHEETS 03-03B SHALL BE PROVIDED AT TIME OF SITE PLAN FOR EMERGENCY ACCESS."

12. Shared Use Path Cash in Lieu - The applicant has Proffered to provide a one-time cash in-lieu contribution of \$342,000 for the cost of construction of the shared use path along the property's frontage along Sycolin Road.

Staff Recommendation: Staff anticipate the actual cost of to be about \$85/square yard, equivalent to \$387,175 and suggest the applicant provide the amount of the full amount of the construction cost. \$85/square yard is a more realistic unit cost for the asphalt shared use path than the per unit cost on the bond estimate form. The Applicant has not included any grading or base with the bond estimate form.

Applicant Response:

The proffer statement is now updated to include a commitment to provide a contribution in the amount of \$387,175.

13. Traffic Signal at Sycolin Road Site Entrance – The applicant has provided a commitment to provide a signal warrant study and if recommended by VDOT, to provide innovative intersection control measures, or a \$500,000 cash-in-lieu contribution.

Staff Recommendation: Staff recommends the applicant clarify that if the warranted intersection improvements (signal or innovative intersection control) are installed by others, or if the signal is not warranted and VDOT does not recommend innovative intersection control, then a cash in lieu contribution be provided per the County recommended template.

Applicant Response:

If the warranted intersection improvements are installed by others, the Owner shall contribute \$500,000 to the County within 30 days of written request by the County. If the signal is not warranted and VDOT does not recommend an innovative intersection control as a result of the Second Warrant Study, the Owner shall contribute \$500,000 to the County prior to the issuance of the zoning permit that will allow the cumulative square footage of data center uses on the subject property to exceed 1,600,000 square feet. If a cash contribution is

made to the County pursuant to this proffer, the Owner shall no longer be required to install intersection improvements, and said contribution shall be used for regional road, transportation, or transit projects in the vicinity of the subject property.

14. Shreve Mill Treatment –The applicant has committed to provide an entrance apron and taper on Shreve Mill Road upon the closure and abandonment by VDOT of Shreve Mill Road east of the Dulles Greenway provided the closure and abandonment of Shreve Mill Road occurs prior to approval of the first site plan for the property.

Staff Recommendation: Shreve Mill Road closure and abandonment is anticipated to occur after Spring 2027 and therefore do not anticipate this Proffer to be triggered as written. Staff recommend the applicant revise the trigger for this proffer.

Applicant Response:

Pursuant to the Applicant's recent discussion with County staff, the proffer language will remain in its current form.

15. Sustainability –

1. Liquid Cooling - The applicant revised the Proffers to allow the option to utilize liquid cooling systems to reduce cooling water use. Staff support this provision.

Applicant Response:

Comment noted.

2. Power - The applicant provided a commitment to restrict power usage to no more than 300 MW during peak grid usage for five years and to monitor energy usage but not demonstrated what will happen if exceeding this power limitation.

Staff Recommendation: Staff recommend the applicant revise the Proffer to demonstrate the impact of this commitment.

Applicant Response:

The Applicant is now committed to provide its power usage to the Zoning Administrator on an annual basis during this five-year period. The Applicant is attempting to break new ground with this proffer commitment and would appreciate further collaboration with County staff following its next review in order to confirm the appropriate approach moving forward.

3. Natural Gas-Powered Generator Analysis - The applicant provided a commitment to perform and provide to the County an analysis to determine the feasibility of installing natural gas-powered generators on-site, however, the applicant did not provide a commitment to implement any results from the study.

Staff Recommendation: Staff recommend the applicant provide the implementation of the recommendations from the proposed study.

Applicant Response:

The purpose of this analysis is to provide additional data for the County in the review of natural gas-powered generators and to help inform the Applicant's decision regarding the installation of these generators. It was not intended to serve as a means by which to require the use of natural gas-powered generators. With this being said, the proffer statement is now updated with the following language, "The Owner shall consider the results of this analysis when installing generators on the Property, but shall not be required to install natural gas-powered generators on the Property."

16. Other CDP Edits:

1. Pedestrian Improvements. The Applicant does not show or indicate improvements along Shreve Mill Road for any pedestrian trail or sidewalk in order to meet the requirements of Section 5-664(D)(1) and the 2019 CTP.

Applicant Response:

This issue was previously resolved with DTCL. The following statement was included in the February 14, 2024 DTCL referral, "Comment 14 (Shreve Mill Road Sidewalk): No further comment. Although the 2019 CTP provides for the construction of a five-foot-wide sidewalk along all public and private streets, DTCL recognizes with the future construction of Crosstrail Boulevard, including bicycle and pedestrian facilities, that would result in this portion of Shreve Mill Road only serving PIN 236- 38-7331 and the pattern of development in the area of this Property, this sidewalk is not necessary."

2. Parking and Building Setback along Dulles Greenway. It appears that the labeled "100' Parking Setback" and the "150' Building Setback" are reversed on the CDP.

Applicant Response:

Setback labels are now revised accordingly on Sheets 03, 03A, and 03B.

3. Sheet 02. The Existing Zoning Map inset needs to be revised to reflect the new PIN given the approval of PLAT-2023-0084.

Applicant Response:

The existing zoning map inset originally provided on Sheet 02 is now removed from the plan set as the subject property is now its own separate parcel. The zoning map inset was originally provided to clarify that the master parcel included areas that were not under consideration to be rezoned, which is no longer applicable per the approved PLAT-2023-0084.

4. Sheet 03A. Update Table 01 to reflect the approval of PLAT-2023-0084 which created a new PIN for the subject property.

Applicant Response:

Table 01 on Sheet 03C is now updated to only state the applicable PIN for the subject property. The data and acreage for the subject property (area of rezoning) have not been modified since the last submission.

We hope that the responses included in this letter sufficiently address the outstanding issues. Please let me know if you have any questions.

Sincerely,

WALSH, COLUCCI, LUBELEY &
WALSH, P.C.



Michael G. Romeo, AICP
Senior Land Use Planner

Enclosures, as follows:

Updated Proffer Statement (Redline and Clean Versions)
Updated Concept Development Plan
Applicant Responses to County Attorney Comments
Applicant Responses to Proffer Management Comments

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September 26, 2024

Via E-Mail

R. Marchant Schneider
Planning Manager, Land Use Review
Department of Planning and Zoning
1 Harrison Street, SE, 3rd Floor
Leesburg, Virginia 20175

Re: Greenlin Park Resubmission
(LEGI-2023-0059: ZMAP-2022-0024)

Dear Mr. Schneider:

On behalf of JK Land Holdings, the applicant for the Greenlin Park rezoning application (“Applicant”), I am providing you with this cover letter summarizing the revisions to application materials included with this resubmission. As referenced below, the Applicant has incorporated numerous application revisions into the enclosed materials and is offering suggestions for how best to approach energy issues that fall outside the purview of this rezoning application.

APPLICATION REVISIONS

Orme Property Collaboration. The Applicant has coordinated with the applicant for the Orme Property rezoning application to incorporate revisions that positively affect both applications. The Orme application is now revised to remove its request for the data center use and to add an energy storage facility to its list of potential uses. With the removal of the data center use, and its associated building height and lot coverage special exception applications, 508,000 square feet of data center use is eliminated from consideration. In its place, a switch and a possible energy storage facility could replace this use. If these uses are established on the Orme property, it would look similar to what is shown in the enclosed exhibit.

Power Restrictions. Power usage will be restricted to no more than 300 megawatts for five years beginning on the date of the approval of this rezoning application. Additionally, the Applicant will monitor its energy withdrawn from the electric grid at least every quarter hour which will be reported to the County on an annual basis for three years beginning one year after reaching full

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power. The purpose of this commitment is to reasonably minimize the use of electricity from the grid at times of peak grid demands.

Water Restrictions. The Applicant is committing to low water usage liquid cooling systems, which is defined as the use of an air-cooled or adiabatic chiller plant and/or liquid to chip (or liquid to liquid) closed loop cooling system.

Energy Storage Facility: An energy storage facility is now identified as a potential use in the application. A location for the energy storage facility is identified in the concept layouts.

EV Charging Stations: The EV charging stations are now upgraded from Level 2 to Level 3 and two EV charging stations are now required for each building on the property.

Natural Gas-Powered Generator Analysis. The Applicant is committing to perform an analysis to determine the feasibility of installing natural gas-powered generators on the property. This analysis will take into account the proximity of an existing natural gas line, the practicality of extending a natural gas line to the property, the reliability standards needed to satisfy the demands of an end user, applicable environmental regulations and requirements, and the site constraints in accommodating natural gas-powered generators.

Noise. The maximum allowable impulsive sound emitted from a data center or its mechanical equipment on the Property is limited to 55 dB(A), as measured at the lot line of the nearest dwelling unit within the Transition Small Lot Neighborhood place type. This commitment includes pre and post construction noise studies to confirm that this 55 dB(A) level will not be exceeded. Even though this property is surrounded by non-residential uses and a six-lane highway, the Applicant is agreeable to including this noise restriction to mitigate against possible noise impacts that may extend beyond the property boundary.

Concept Layouts and Sample Elevations. Concept layouts and sample elevations are now incorporated into the updated plan set. These layouts and elevations provide a more detailed assessment of what is likely to be developed on the property. The Applicant is agreeable to generally conforming to these layouts and elevations.

Sycolin Road Building Limitation Zone. To address comments about the proximity of buildings along Sycolin Road, the Applicant is agreeing to a Building Limitation Zone that restricts the percentage of buildings and equipment yards within the area between 75' and 100' from Sycolin Road to no more than 10 percent.

Sycolin Creek Discharge. The Applicant added text back into the proffer statement that restricts stormwater discharge directly into Sycolin Creek without passing through an upstream facility such as stilling basins, step pools, naturalized channels, or other facilities approved by the Department of Building and Development.

County Attorney Proffer Revisions. The enclosed proffer statement includes revisions addressing the comments offered by the Office of the County Attorney, dated August 1, 2024. Responses to the County Attorney's comments are also enclosed.

ENERGY ROUNDTABLE MEETINGS

Separate from application revisions referenced in this letter, the Applicant is committed to exploring alternative solutions to on-site generation and technologies with low and net-zero carbon emission profiles as well as energy storage that can be applied to properties throughout the County. The Applicant acknowledges that multiple promising technologies are being developed but require further evaluation and other steps taken before commercial-scale viability is achieved. The Applicant suggests that input be sought from alternative generation technology providers, regulators, and public stakeholders through a series of roundtable meetings. The Applicant would be amenable to coordinating these roundtable meetings in consultation with the Board of Supervisors and County staff.

We look forward to continuing to work with County staff as we finalize our updated materials for Board consideration. Please let me know if you have any questions.

Sincerely,

WALSH, COLUCCI, LUBELEY &
WALSH, P.C.



Michael G. Romeo, AICP
Senior Land Use Planner

Enclosures, as follows:

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Updated Concept Development Plan
Applicant Responses to County Attorney Comments
Orme/Greenlin Park Illustrative Exhibit

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