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HANOVER COUNTY

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BUSINESS MANAGER

P. O. BOX 470
HANOVER, VIRGINIA 23069
PHONE 804-365-6171

May 22, 2025

VIA email: acondlin@rothjackson.com
Andrew M. Condlin
Roth Jackson Gibbons Condlin, PLC
1519 Summit Avenue
Richmond, VA 23230

RE: REZ2025-00010/SE2025-00009, Tradeport Hanover Land, LLC (Staff Comments)

Dear Mr. Condlin,

Planning staff has conducted a review of your application materials and provides the comments listed below. Attached, you will also find comments from other reviewing agencies. Your request has tentatively been placed on the Planning Commission's agenda for August 21, 2025. Please respond to the comments below by **July 18, 2025**, which is the submittal deadline for the August meeting. Please email me a PDF of the revisions, so that staff can ensure all comments have been addressed before making hard copies of full-size plans. Hard copies will be due 14 days prior to the Planning Commission meeting.

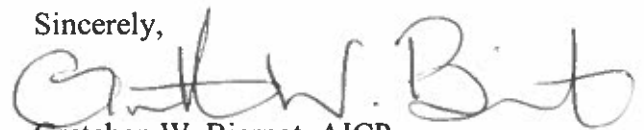
The following are Planning staff's comments regarding your request:

1. Conceptual plan:
 - a. Public Works has requested that the existing pond be added to the conceptual plan.
 - b. Sheet L-100, Note #4 states that tree preservation must adhere to Section 26-144 of the Zoning Ordinance, which is the Development Standards section of the OS ordinance. Note #7 states that the planting will be in compliance with a principal solar facility buffer requirements, so the reference to the OS District is not necessary. Remove the first sentence in Note #4. The second sentence should be revised to state the following: **Tree protection measures and replacement requirements to be provided at the time of site plan review.**
 - c. Note #7 should be revised to state the following: **The minimum 150' buffer will be in compliance with Section 26-292.5(4) of Hanover County Code (Landscaping for Solar Energy Facilities).**

- d. Note #6 on Sheet L-100 should be deleted. Grading should be addressed in Proffer #5. (Recommended proffer changes are attached.)
 - e. Sheets L-102 and 102A show areas with planted entry buffers adjacent to the natural buffer area. Provide the following note on these sheets:
 - i. **No grading may take place within 20' of the area identified as remaining preserved as described in Proffer #5.**
 - ii. **Comparable plant species may be substituted at the time of site plan with approval by the Planning Department.**
2. Staff is recommending additional proffers be submitted that address the following issues/concerns:
- a. There is concern that reuse of the data center buildings will be difficult (if that use is ever discontinued). It is recommended that a proffer be submitted that addresses the removal or reuse of the buildings after a certain period of time. For example, other localities have considered regulations addressing decommissioning, with only the slab remaining after the use ceases or the building returned to a shell to accommodate reuse by another industry.
 - b. It was suggested at a public hearing for the previous case that a special liner be installed within stormwater management ponds on-site. The hydrocarbons from the generators are a concern for nearby shallow wells. (See email attached.)
 - c. Generators should be placed towards the center of the property to reduce potential noise impacts to neighbors.
3. Please coordinate with staff to schedule a community meeting that must be held prior to advertising for the Planning Commission public hearing.
4. Please submit a response sheet to this comment letter.
5. Staff may have additional comments following responses to this letter and the community meeting.

If you have any questions, please contact me at (804) 365-6369.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gretchen W. Biernot".

Gretchen W. Biernot, AICP
Current Planning Manager

4. Buffers. The exterior boundary lines of the Data Center Area (not including the Jurisdictional Boundary) will contain a buffer a minimum of one hundred fifty feet (150') in width as generally shown on the Concept Plan as "MINIMUM 150' BUFFER" and developed generally as shown on those certain plans prepared by LandDesign and MGMA, entitled "IRON HORSE DATA CENTER" designated as Sheets L-100, L-101, L-102, L-102A, and L-103, and attached hereto as Exhibit B (the "Data Center Landscape Plans"). Any trees within such buffer will remain undisturbed; provided, however, this will not prevent the removal of trees necessary for the construction of drainage or public utility improvements, access drives, or the planting of the Route 54 Entry Buffer, as shown on the Concept Plan, other trees pursuant to an approved landscape plan. This buffer will also include a thoroughfare buffer along East Patrick Henry Road (State Route 54) which will be provided and designed in accordance with the standards set forth in Section 26-292.5(4) of the County Zoning Ordinance. No buffer will be required by this proffer with respect to the Jurisdictional Boundary or any internal parcel, lot, property or boundary line, regardless of fee ownership.
5. Buffer Protection Measures. ~~No If any grading, construction activity, or other land disturbance will be permitted on the interior of the Property comes within twenty feet (20') of the interior edge of any portion of a buffer, then it~~ In order to protect that portion of the buffer, a temporary ~~tree protection~~ construction fence, with a minimum height of four (4) feet, ~~must shall~~ be installed 20' from along tthe interior edge of that portion of the buffer (i.e. where the Natural Buffer is 150' as set forth above, the temporary ~~tree protection~~ construction fence will be installed 170' in from the boundary line of the Property to protect that portion of the buffer). The temporary fence may be removed upon completion of the ~~applicable construction or other land disturbance activity~~ project. The Planning Department must inspect the tree protection measures prior to the issuance of a land disturbance permit on-site.
6. Building Height. No building on the Property shall exceed 75' in height (including any rooftop screening or parapet walls). This proffered condition is subject to the approval of a Special Exception by the County Board of Supervisors
7. Transportation Improvements.
 - a. Phasing. Prior to any site plan approval, a phasing plan for all improvements required herein will be submitted to and approved by the County. The improvements will be made in accordance with the approved phasing plan to the extent not otherwise completed. Prior to each site plan

- b. Ground-mounted and wall-mounted mechanical equipment. Mechanical equipment mounted on or near ground-level, or otherwise mounted on a building wall, must be screened by any combination of sight-obscuring dense evergreen vegetation or decorative walls or fences that incorporates at least one of the primary materials or colors of the nearest wall of the primary structure on the lot. The height of the vegetation, wall, or fence shall equal or exceed that of the mechanical equipment being screened. In addition to screening, ground-mounted mechanical equipment must be separated from adjacent residential homes by a principal building.
- c. Planning Director's Review. The method of screening will be submitted at the time of site plan review and line of sight profiles will be provided prior to site plan approvals. As determined by the Planning Director, screening for mechanical equipment for Data Center Uses may incorporate perforated surfaces on screening walls as necessary to permit ventilation of such mechanical equipment while still providing adequate screening.

15. Signs. With the exception of on-site directional signs, all free-standing signs will be monument type with a masonry base. Such signs may be either internally illuminated or lit with down lighting; directional signs will be internally illuminated only. Building or façade mounted advertising signs will not be illuminated. The materials and design of any signs will be compatible with the proposed materials and architectural theme of the proposed structures.

16. Lighting.

- a. House-side shields, louvers, or similar devices must be used to shield the source of exterior lighting from residentially-zoned properties (which includes properties zoned A-1, Agricultural). House side shields must be installed on all lighting fixtures.
- b. Parking lot lighting will be limited to thirty feet (30') in height and any pole-mounted exterior lighting within three hundred feet (300') of the exterior boundary of the Property (not including the Jurisdictional Boundary) will not exceed eighteen feet (18') in height.

Department of Public Works Comments

CASE NAME: Tradeport Hanover Land LLC

TRACKIT PROJECT #: REZ2022-00010

PLEASE MARK THE APPROPRIATE BOX BELOW:

No Comment



Comments Below



DATE: 04/14/2025

REVIEWED BY: MJD

RPA crossing should be minimized. One crossing is preferred.

Floodplain, RPA and wetlands should be clearly labeled and shown with consistent line codes on the plan of development. If BMPs are anticipated to meet state and county standards, these locations should also be shown. Show existing onsite pond.

No grading for BMPs will be allowed in the RPA. Outfalls and RPA crossings must minimize RPA and wetland impacts.

For site plan

- 1) Wetlands delineation and if present, applicable permits from US Army Corps of Engineers required.
- 2) Identify RPA Areas. No stormwater BMPs are allowed in RPA areas.
- 3) Water Quality Impact Assessment certifications required. See WQIA forms available at <https://www.hanovercounty.gov/DocumentCenter/View/163>
- 4) Disturbance in floodplain will require a H&H study must meet encroachment provisions in Sect 26-235.15 of Hanover County Ordinance as follows.
“ Within any floodway area, no encroachments, including fill, new construction, substantial improvements, or other development shall be permitted unless it has been demonstrated through hydrologic and hydraulic analysis, performed in accordance with standard engineering practice, that the proposed encroachment will not result in any increase in flood levels within the county during the occurrence of the base flood. Hydrologic and hydraulic analyses shall be undertaken only by professional engineers or others of demonstrated qualifications, who shall certify that the technical methods used correctly reflect currently-accepted technical concepts. Studies, analyses, or computations shall be submitted in sufficient detail to allow a thorough review by the floodplain administrator.

Development activities which increase the water surface elevation of the base flood may be allowed, provided that the applicant first applies with the county's endorsement for a CLOMR, and receives FEMA approval."

- 5) Plans must demonstrate that the site is less than 1% of drainage area at the outfall of the storm sewer system, or detention may be required.
- 6) Any ponds remaining onsite must meet Hanover county requirements. Disposition of the pond and any associated wetland or other permitting to be addressed.

ZONING STAFF MEETING

Department of Public Utilities Comments

CASE NAME: Tradeport Hanover Land, LLC

PROJECT #: REZ2025-00010

PLEASE MARK THE APPROPRIATE BOX BELOW:

No Comment: ☐

Comments Below: ☒

DATE: 4/17/2025

REVIEWED BY: T. Watkins

The Hanover County Department of Public Utilities (DPU) has reviewed the above referenced rezoning request and has the following comments:

1. All water and sanitary sewer extensions and services will be constructed in accordance with DPU requirements.
2. A Utility Master Plan shall be approved for the entire development prior to DPU recommending approval of any included site plan or construction plan.
3. The public water and sanitary sewer improvements must be coordinated with the improvements for proposed development in the Town of Ashland.
4. Specific public water and sanitary sewer improvements will be based on the proposed development. With appropriate improvements, the public water and sanitary sewer systems can support the development of the property for most of the likely uses of the property. The following items will be required during the construction plan approval process for this development:
 - a. A sewer shed analysis will be required.
 - b. Replacement of the existing sanitary sewer crossing under I-95 and additional improvements downstream including wastewater pump station upgrades may be required once the overall sewer demands are determined.
 - c. A waterline crossing under I-95 may be required.
 - d. The equivalent of a 20" waterline shall be extended through the development. The waterline will extend from the southwest end of the residential part of the development to the northeast end or main entrance of the development.
 - e. Easements shall be dedicated for a future 20" waterline extension under I-95.
 - f. A waterline extension will be required along Entry B across Route 54.
5. If improvements are proposed to Mount Herman Road as part of the development, a public waterline will need to be constructed along the road as part of the improvements.

6. After the zoning process, but prior to initiating site design or construction drawings, the developer should meet with the Fire Marshal's office to discuss the proposed layout and determine the location of the fire hydrants and then meet with DPU to discuss the layout of the waterlines that will supply the hydrants.

Please feel free to contact me if you have any questions or concerns.



HANOVER FIRE-EMS

OFFICE OF THE FIRE MARSHAL



P.O. Box 470 Hanover, VA 23069, General Questions - (804) 365-6195, Email - fmo@hanovercounty.gov

FIRE PLANS REVIEW

Date:	4-16-2025
Subject:	Tradeport Hanover Land, Iron Horse Data Center
Jurisdiction:	Hanover
Trakit File #	REZ2025-00010
From:	Lieutenant Paul Polivka Phone: 804-365-4858 Email: ptpolivka@hanovercounty.gov
To:	Gretchen Biernot
Type of Review:	Rezoning 1 st Review
Comments:	1. The Hanover Office of the Fire Marshal has completed its review of the Rezoning of this property and has the following comments as the project advances. ○ The submitted plan shall indicate the location of all required or existing fire hydrants after determining the number and distribution of fire hydrants: VSFPC - C105.1 (2012) ○ Provide details on the method to access all exterior points of the building from within 150 feet of an approved emergency fire apparatus access roadway. Approved fire apparatus access roads shall be provided for every facility, building, or portion of a building hereafter constructed or moved into or within the jurisdiction. The fire apparatus access road shall comply with the requirements of this section and shall extend to within 150 feet of all portions of the facility and all portions of the exterior walls of the first story of the building as measured by an approved route around the exterior of the building or facility. VSFPC - 503.1.1 (2021) ○ Fire apparatus access roads shall have an unobstructed width of not less than 20 feet (6096 mm), exclusive of shoulders, except for approved security gates in accordance with Section 503.6, and an unobstructed vertical clearance of not less than 13 feet 6 inches (4115 mm). VSFPC 503.2.1. ○ Where a fire hydrant is located on a fire apparatus access road, the minimum road width shall be 26 feet. VSFPC - D103.1 (2012) ○ The fire code official is authorized to require more than one fire apparatus access road based on the potential for impairment of a single road by vehicle congestion, terrain conditions, climatic conditions, or other factors that could limit access: VSFPC- 503.1.2 (2021)



HANOVER FIRE-EMS

OFFICE OF THE FIRE MARSHAL



P.O. Box 470 Hanover, VA 23069, General Questions - (804) 365-6195, Email - fmo@hanovercounty.gov

FIRE PLANS REVIEW

- Fire apparatus access roads shall be designed and maintained to support the imposed loads of fire apparatus and shall be surfaced to provide all-weather driving capabilities. VSFPC - 503.2.1 (2021)
- Where two fire apparatus access roads are required, they shall be placed a distance apart equal to not less than one-half of the length of the maximum overall diagonal dimension of the lot or area to be served, measured in a straight line between accesses. VSFPC - D104.3 (2012)
- Buildings or facilities exceeding 30 feet or three stories in height shall have at least two means of fire apparatus access for each structure. VSFPC - D104.1 (2012)
- Buildings or portions of buildings or facilities exceeding thirty feet in height above the lowest level of fire department vehicle access shall be provided with an aerial fire apparatus access road. The aerial fire apparatus access road shall have a minimum of twenty-six feet of unobstructed clear width in the immediate vicinity of the building. Overhead obstructions in the form of utility or power lines shall not be located within the aerial fire apparatus access roadway. At least one aerial fire apparatus access roadway shall be located a minimum of fifteen feet and a maximum of thirty feet from the building and positioned parallel to one entire side of the building: VSFPC - D105.1 / D1105.2 (2012)
- Fire protection equipment shall be identified in an approved manner. Rooms containing controls for air conditioning or fire protection systems shall be identified for the use of the fire department. Approved signs required to identify fire protection system equipment and equipment location shall be constructed of durable materials, permanently installed, and readily visible. VSFPC – 509.1 (2021)
- An approved water supply for fire protection, either temporary or permanent, shall be made available as soon as combustible building materials arrive on the site, on commencement of vertical combustible construction, and the installation of a standpipe system in buildings under construction in accordance with Sections 3313.2 through 3313.5. VSFPC - 3313.1 (2021)
- As this project progresses, the applicant should be aware of the requirements of the Hanover Fire Marshal's Office. Requirements can be found on the Hanover Fire and EMS web page: <https://www.hanovercounty.gov/1082/Plans-Review>.
- The Hanover County- Plans Review Guidelines and the Commercial Development- Checklist are in the Reference Plans Review Tab.

Biernot, Gretchen W.

From: Cheely, Claudia
Sent: Wednesday, April 16, 2025 10:35 AM
To: Biernot, Gretchen W.
Subject: FW: Iron Horse Ponds

From: Dieter, Michael J. <MJ.Dieter@hanovercounty.gov>
Sent: Wednesday, April 16, 2025 10:17 AM
To: Biernot, Gretchen W. <gwbiernot@hanovercounty.gov>; Hunter, Jo Ann M. <JMHunter@hanovercounty.gov>
Subject: Iron Horse Ponds

Spoke with Mike Flagg on his reasoning for pond liner. He indicated that the well adjacent are all shallow wells that are susceptible water quality influence from surface water/from ponds like this. Deep wells are not an option in the area due to Sulphur and salinity in the groundwater at depth. The hydrocarbons from the generators were a concern. It is likely that they will be required to line ponds based on a high groundwater table in the area so they might agree to including liners for any ponds with nearby groundwater wells.

Michael J Dieter, P.E.
Engineering Manager
Department of Public Works

Desk-804-365-6237
Fax-804-365-6233