

Andrew M. Condlin

Richmond Office

(804) 977-3373 (direct)

acondlin@rothjackson.com

December 23, 2025

VIA: ELECTRONIC MAIL

Mr. Brendan McHugh, Planner  
Hanover County Planning Department  
7516 County Complex Road  
Hanover, Virginia 23059

RE: REZ2025-00014, Farley Farms, L.L.C.  
CUP2025-00011, Old Ridge Road, L.L.C.  
SE2025-00019, Old Ridge Road, L.L.C.

Dear Mr. McHugh:

The following are Applicant's responses to Planning staff's comments made pursuant to your letter dated August 15, 2025:

1. Add the following details to the conceptual plan:

**RESPONSE: Please see generally updated conceptual plan for Item 1(a-l). See below for specific comments regarding each subitem.**

- a. Building locations with use labels.

**RESPONSE: Building locations are shown on sheets 7 and 8.**

- b. Solar panel locations

**RESPONSE: Solar panels would be on building roofs. The details and images are shown on sheet 13.**

- c. Interior roads including widths

**RESPONSE: Road widths are shown on sheets 7 and 8.**

- d. Buffer planting details and buffer widths

**RESPONSE: Existing tree buffers are shown in dark green. The existing tree coverage is meant to serve as the buffer. The width of the buffer is 150' as shown on sheets 7-8.**

- e. Distances of nearest homes to property lines

**RESPONSE: Distances are shown. The nearest home to the property line is 296'. Shown on sheet 5.**

- f. Access to the proposed Stormwater Management Area

**RESPONSE: Stormwater access is intended to be provided through secondary access outside of the data center campus along the western property line.**

- g. Tree preservation areas

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**RESPONSE: Tree conservation areas are shown in dark green**

- h. The turn taper that is recommended in TIA
  - **RESPONSE: Right turn taper lane shown on concept plans on sheets 7 and 8.**
- i. Wetlands and RPA locations  
**RESPONSE: RPA locations are shown as minimum requirement for CUP submittal.**
- j. Open space acreage.  
**RESPONSE: Open space acreage is approximately 82 ACR, see notes on sheet 6.**
- k. Label the South Anna River.  
**RESPONSE: The South Anna River is labeled, see sheet 6.**
- l. Show proposed fencing locations.  
**RESPONSE: New fence locations on sheets 7 and 8. Details shown on sheet 10.**
- m. The access points need to be further apart (*Note comments from the Fire Marshalls Office*). In addition, note that the adjacent property across Old Ridge Road (GPIN 7882- 62-8376) is zoned M-3 with proffered conditions (Case C-51-05). In that case, entrance locations were proffered. Consider coordinating entrance locations and improvements to minimize conflicts along Old Ridge Road. Proffer #8 in that case requires that the entrances be located at the locations shown on an entrance plan, and that any use generating 1,772 or more daily trips will have to provide left- and right-turn lanes at each project entrance. The TIA submitted with REZ2025-00014 indicates that this proposed project will generate more trips than possible development across Old Ridge Road, but lesser improvements are proposed.  
**RESPONSE: The development will generate less than 1772 daily trips. Also, Right turn/taper lane is provided on Old Ridge Road per the TIA, see sheets 7 and 8. The entrance spacing meets VDOT requirements and an exception request has been submitted to the Fire Marshal's office.**
- n. The CUP Area should include all development related to the CUP including buffers and accesses, and Stormwater Management. Please adjust the area to include these features.  
**RESPONSE: CUP area encompasses the entire property. Bearings and distances for the boundary are included on the ALTA Survey sheets. Please see attached revised application including all 205 acres of the property.**
- o. If there will be phasing of the facility, please identify details on the plan.  
**RESPONSE: Currently, no phasing is proposed though the power generation component may be considered as a secondary phase.**

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2. Photos of buildings and development details were submitted. Please submit drawings of the buildings and development details with measurements and color labels, including solar panel details and add them as sheets to the conceptual plan.

**RESPONSE: Solar panels would be located on building roofs. The details and images are shown on the updated plan sheet 13.**

3. Regarding the proffers that were submitted, staff recommends addressing the following:

- a. Add the following proffer: *Fire/EMS: Within six months of operation of the facility, the owner or developer must coordinate with the County's Fire-EMS Department to provide materials, education, and/or training to their staff serving the development and how to safely respond to on-site emergencies.*

**RESPONSE: See new Proffer #26.**

- b. Add a proffer for the turn taper recommended in TIA.

**RESPONSE: See new Proffer #23(c).**

- c. Note that the adjacent segment of the South Anna River is identified on the Comprehensive Plan: Natural Heritage Conservation Sites Map as a Stream Conservation Unit, based upon the Virginia Department of Conservation and Recreation's Natural Heritage Data Explorer. Natural heritage sites are described on p144 of the Comprehensive Plan, and Strategy EN.3e encourages the protection of these resources during the development review process (p. 156). Consider site design features and/or proffers that prevent and mitigate impacts to on-site natural heritage resources.

**RESPONSE: See new Proffer #27. Also, the site intentionally preserves large wetland and buffers to the south to minimize impacts to the South Anna River.**

- d. Proffer #18 (Buffers) should include more details related to maintenance and planting standards for areas lacking vegetation. I have attached the ordinance for a similar case (see proffer #4) for reference. In addition, the proffer states that the buffer is 150' wide; however, the buffer shown on the plan varies in width.

**RESPONSE: See revised Proffer 18. See also updated plan for consistent 150' buffer width.**

- e. Proffer #7 (Construction Traffic): Add the following language: *Prior to site plan approval and following construction of the facility, the owner or developer must contact the Virginia Department of Transportation (VDOT) to inspect the pre-construction and post-construction conditions of Old Ridge*

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*Road (State Route 738) to ensure that the road has been restored to pre-construction conditions.*

**RESPONSE: See revised Proffer #7.**

4. Regarding the Traffic Impact Analysis that was submitted, please address the following as discussed in the scoping meeting:
  - a. The assumed development for the property is 1.0M sf distribution center.  
**RESPONSE: This has been revised to 2 MSF data center**
  - b. The scope of study should be expanded to include the US 1/Kings Dominion Blvd and US 1/Ellet's crossing intersections.  
**RESPONSE: This has been included.**
  - c. The trip distributions should be adjusted to reflect site-generated traffic more heavily weighted to the north to access Kings Dominion Blvd and I-95, as opposed to going south through Ashland.  
**RESPONSE: This has been revised accordingly.**
  - d. The assumed growth rates for background traffic should show as 2% for US 1 and 1% for the other roads, as discussed.  
**RESPONSE: This has been revised accordingly.**
5. Please submit a water capacity analysis for the proposal (*See comments from Public Utilities*).  
**RESPONSE: We have reached out to DPU with the updated flow numbers and they are running their models.**
6. I am still waiting on comments from the Historical Commission and the Public Works Airport Division. I will send you comments when I receive them.  
**RESPONSE: See new Proffer #27. We have reached out to the airport and will follow-up.**
7. Staff recommends a community meeting for this case. When planning the community meeting, please coordinate the meeting with your district representatives and staff to determine a mutually acceptable date for the meeting. Please schedule this meeting ahead of the resubmittal deadline. Staff may have additional comments depending on the outcome of the community meeting. I have attached community meeting guideline for reference  
**RESPONSE: Community meeting held October 6, 2025. We will discuss additional community outreach with Mr. Stoneman and Ms. Iverson.**
8. Please submit a response sheet to this comment letter.  
**RESPONSE: Acknowledged.**

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9. Contact me to set up a meeting to discuss these comments with staff.

**RESPONSE: Acknowledged.**

10. Please email me a PDF of the revised sketch plan and proffers before submitting hard copies. Hard copies will be due by November 6, 2025.

**RESPONSE: Acknowledged. Though we previously asked for a continuance through March 2026, the Applicant would now like to be placed on the Planning Commission's agenda for its February 2026 meeting.**

11. Staff may have additional comments following responses to this letter and the community meeting.

**RESPONSE: Acknowledged.**

### **DEVELOPMENT REVIEW COMMENTS**

#### **SE 2025-00019**

- The height restrictions for the M-2 are as follows: All structures not specifically exempted in Section 26-248 shall not exceed a height of three (3) stories or forty-five (45) feet, whichever is less. This would apply for the proposed buildings (Section 26- 179(2))

**RESPONSE: Acknowledged. We are revising our special exception application to ask for buildings not to exceed eighty-five feet (85')**

- Section 26-248(a)(l)(m) states that smoke stacks can be a height not to exceed one hundred twenty-five (125) feet. This would apply to the proposed smoke stacks.

**RESPONSE: Acknowledged. We are removing our request for a special exception for increased height allowance for any smokestacks.**

- The Conceptual Plan needs more details, please revise accordingly to the sketch plan requirements, please show the location of the proposed building and smokestacks.

**RESPONSE: See updated plans regarding building locations. We are removing our request for a special exception for increased height allowance for any smokestacks.**

- Might be worth asking for photo simulations for the 110' buildings and the 180' smoke stacks. Views from any historical features and from public right-of-way.

**RESPONSE: Acknowledged.**

### **DEPARTMENT OF PUBLIC UTILITIES (DPU)**

#### **CUP2025-00011**

1. Any improvements, extensions or new connections to the public water or

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sanitary sewer systems will need to be completed in accordance with DPU requirements.

**RESPONSE: Acknowledged**

2. Public water service will require an off-site 16" waterline extension. Off-site Water and Sanitary Sewer Easements may be required.

**RESPONSE: Acknowledged**

3. Public sanitary sewer service is not immediately available.
  - a) Providing public sanitary sewer service may require construction of public and/or private wastewater pump stations and sanitary sewer force mains.
  - b) Gravity sanitary sewer service is not currently available to this site.
  - c) Off-site Water and Sanitary Sewer Easements will be required.

**RESPONSE: Acknowledged**

4. Off-site Water and Sanitary Sewer Easements shall be recorded prior to DPU recommending approval of any construction plan or site plan for this development.

**RESPONSE: Acknowledged**

5. This development may be eligible for oversized credits for the water and sanitary sewer improvements.

**RESPONSE: Acknowledged**

6. A Utility Master Plan will be required for this development.

**RESPONSE: Acknowledged**

7. A detailed water and wastewater demand analysis will be required before DPU can determine the required improvements to support this development.
  - a) The Doswell Wastewater Treatment Plant and Ashland Wastewater Treatment Plant may not have the capacity to provide wastewater treatment for this development. Additional improvements at these facilities may be required to provide public sanitary sewer service.
  - b) Alternatively, wastewater from this development may be required to discharge to the Totopotomoy Wastewater Treatment Plant.

**RESPONSE: Acknowledged**

8. The developer is responsible for the cost of all the improvements required to support this development.

**RESPONSE: Acknowledged**

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9. 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.

**RESPONSE: Acknowledged**

**SE2025-00019**

**No comments**

**REZ2025-00014**

10. Any improvements, extensions or new connections to the public water or sanitary sewer systems will need to be completed in accordance with DPU requirements.

**RESPONSE: Acknowledged**

11. Public water service will require an off-site 16" waterline extension. Off-site Water and Sanitary Sewer Easements may be required.

**RESPONSE: Acknowledged**

12. Public sanitary sewer service is not immediately available.
  - a) Providing public sanitary sewer service may require construction of public and/or private wastewater pump stations and sanitary sewer force mains.
  - b) Gravity sanitary sewer service is not currently available to this site.
  - c) Off-site Water and Sanitary Sewer Easements will be required.

**RESPONSE: Acknowledged**

13. Off-site Water and Sanitary Sewer Easements shall be recorded prior to DPU recommending approval of any construction plan or site plan for this development.

**RESPONSE: Acknowledged**

14. This development may be eligible for oversized credits for the water and sanitary sewer improvements.

**RESPONSE: Acknowledged**

15. A Utility Master Plan will be required for this development.

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**RESPONSE: Acknowledged**

16. A detailed water and wastewater demand analysis will be required before DPU can determine the required improvements to support this development.
  - a) The Doswell Wastewater Treatment Plant and Ashland Wastewater Treatment Plant may not have the capacity to provide wastewater treatment for this development. Additional improvements at these facilities may be required to provide public sanitary sewer service.
  - b) Alternatively, wastewater from this development may be required to discharge to the Totopotomoy Wastewater Treatment Plant.

**RESPONSE: Acknowledged**

17. The developer is responsible for the cost of all the improvements required to support this development.

**RESPONSE: Acknowledged**

18. 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.

**RESPONSE: Acknowledged**

**FIRE MARSHAL**

**CUP2025-00011**

1. The Hanover Office of the Fire Marshal has completed its review of the Special Exception and has the following comments as the project advances.
  - a) 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>.

**RESPONSE: Acknowledged**

- b) Buildings or facilities with a gross area of more than 62,000 square feet (124,000 w/sprinklers) shall be provided with two separate and approved fire apparatus access roads. VSFPC - D104.2 (2012)

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**RESPONSE: Acknowledged**

- c) 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)

**RESPONSE: Two separate fire apparatus roads are proposed. A code modification request was sent to the Fire Marshal office on 12/11/2025.**

- d) The Hanover County-Plans Review Guidelines and the Commercial Development-Checklist are in the Reference Plans Review Tab.

**RESPONSE: Acknowledged.**

**SE2025-00019**

1. The Hanover Office of the Fire Marshal has completed its review of the Special Exception and has the following comments as the project advances.
  - a) 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>.

**RESPONSE: Acknowledged**

- b) Buildings or facilities with a gross area of more than 62,000 square feet (124,000 w/sprinklers) shall be provided with two separate and approved fire apparatus access roads. VSFPC - D104.2 (2012)

**RESPONSE: Acknowledged**

- c) 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)

**RESPONSE: Two separate fire apparatus roads are proposed. A code modification request was sent to the Fire Marshal office on 12/11/2025**

- d) The Hanover County-Plans Review Guidelines and the Commercial Development-Checklist are in the Reference Plans

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P: 703-485-3535 F: 703-485-3525

Review Tab.

**RESPONSE: Acknowledged**

**REZ2025-00014**

1. The Hanover Office of the Fire Marshal has completed its review of the Special Exception and has the following comments as the project advances.
  - a) 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>.

**RESPONSE: Acknowledged**

- b) Buildings or facilities with a gross area of more than 62,000 square feet (124,000 w/sprinklers) shall be provided with two separate and approved fire apparatus access roads. VSFPC - D104.2 (2012)

**RESPONSE: Acknowledged**

- c) 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)

**RESPONSE: Two separate fire apparatus roads are proposed. A code modification request was sent to the Fire Marshal office on 12/11/2025.**

- d) The Hanover County-Plans Review Guidelines and the Commercial Development-Checklist are in the Reference Plans Review Tab.

**RESPONSE: Acknowledged.**

**DEPARTMENT OF PUBLIC WORKS**

**REZ2024-00014**

No comments on Rezoning

Comments on future development.

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19. Wetlands delineation, evaluation of CBPA and extent of RPA required. Water quality impact assessment certification required along with associated supporting information.

**RESPONSE: Acknowledged**

20. Additional development subject to runoff reduction and channel protection.

**RESPONSE: Acknowledged**

21. With the large increase in impervious areas, it is likely that the onsite detention of stormwater will be required.

**RESPONSE: Acknowledged**

22. If development is 5 acres or more or 10lb or more of phosphorus load, 75% of nutrient reduction must be met on site.

**RESPONSE: Acknowledged**

23. Analysis of downstream manmade and natural systems to a point where the site is less than 1o/ of drainage area will likely be required.

**RESPONSE: Acknowledged**

24. Use new DEQ Virginia Stormwater Management Handbook for E&S and Stormwater design and specifications.

**RESPONSE: Acknowledged**

**DEPARTMENT OF TRANSPORTATION**

1. It is the Departments understanding that the study will be rescoped and subsequently revised prior to the next submission.

**RESPONSE: The study was rescoped with VDOT and the County on 10/9/25.**

2. The Department assumes that the intersection and stopping sight distance at the proposed entrance locations have been checked.

**RESPONSE: Acknowledged. These will be verified at the time of site plan approval.**

3. Please note that other data centers in the district have had major traffic impacts during construction, with the construction traffic having more of an impact than anticipated at the buildout of the site. If a data center is a proposed use the Department recommends adding a scenario to the study that would capture construction traffic.

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**RESPONSE: Acknowledged. A scenario has been added to look at the impact of construction traffic on the site entrances.**

4. A VDOT Land Use Permit will be required prior to any work within the right of way. The owner/developer must contact the Ashland Residency Transportation and Land Use Section at 804-585-3592 for information pertaining to this process.

**RESPONSE: Acknowledged.**

Sincerely,



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